

*PEMBROKESHIRE COAST NATIONAL PARK
MANAGEMENT PLAN 2020-2024*

FINAL REPORT OF ENGAGEMENT AND
CONSULTATION

Pembrokeshire Coast National Park Authority

11th December 2019

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1. INTRODUCTION

1. Many organisations and individuals contribute to National Park purposes. A National Park Management Plan is a way of coordinating those efforts; it is a plan for achieving National Park purposes, not just a plan for the Park Authority¹.
2. The Pembrokeshire Coast National Park Authority has reviewed the current National Park Management Plan (2015-2019) for Pembrokeshire Coast National Park in line with an [engagement strategy](#) approved by the National Park Authority on 20th June 2018.
3. This final report of consultation and engagement outlines the ways stakeholders have been involved in preparation of the Pembrokeshire Coast Management Plan 2020-2024.

2. REVIEW PROGRAMME AND ENGAGEMENT STRATEGY

4. An outline timetable for Management Plan preparation was approved in the National Park Authority's Corporate and Resources Plan 2018/19. A more detailed timetable, approved by the Authority on 20th June 2018, is given below.

Milestone	Who / when
Draft preparation timetable, and methods of engagement	Leadership Team, external bodies. May 2018
Approve timetable and engagement proposals	National Park Authority. June 2018
Engage with key stakeholders: <ul style="list-style-type: none"> • Collate evidence (outcomes, issues, policy impact) • Draft / revise Plan and associated assessments (see "Requirements for impact assessments" below) • Prepare an action planning framework 	July to December 2018
Member Workshops to discuss draft reports and assessments	Spring 2019 [Workshops took place on 20 th February 2019 and 3 rd April 2019.]
Authority approval of consultation draft documents (Management Plan, Sustainability Appraisal / Strategic Environmental Assessment, Habitats	National Park Authority June 2019

¹ Each National Park Authority must prepare a five-yearly Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Section 66 of the Environment Act, 1995).

Milestone	Who / when
Regulations Assessment, Equality Impact Assessment)	
Translation and formatting	June/July 2019
Public consultation (12 weeks)	Park Direction Team August 2019 - October 2019
Report of consultations to Authority. Authority approval of amended documents	National Park Authority December 2019
Translation and formatting	Park Direction/Graphics Team December 2019/ January 2020
Feedback to consultees	December 2019
Publication of approved Management Plan and assessments; formal notification / adoption statements.	January 2020

5. Informal comment on the strategy itself was invited from public, private and third sector organisations during drafting (**Annex 1**).
6. A log of engagement activity is attached at **Annex 2**.

3. EVENTS

7. Five events, aimed at hearing the views of people less likely to engage through written consultation approaches were conducted by the Discovery Ranger – Education. The list of the events is presented in the table below. A sixth event was postponed then cancelled due to lack of take-up.

Event	Date
Scolton Manor Playday	1 st August 2018
Ateb Big Day Out	17 th August 2018
Travelling Ahead Gypsy Forum	17 th October 2018
Solva Care	27 th November 2018
Youth Rangers	2 nd December 2018

8. The outputs from these events are attached at **Annex 3**.

4. OPPORTUNITIES AND CHALLENGES

9. “*Opportunities and Challenges: Discussion Paper for the National Park Management Plan 2020-2024*”² was published and promoted for comment during the period 20th November 2018 to 4th January 2019 as part of the early engagement programme for National Park Management Plan review, i.e. prior to any policy drafting.

² [Opportunities and Challenges: Discussion paper for the Management Plan 2020-2024](#)

10. The discussion paper, accompanying maps (including an online version) and a series of background papers³ were drafted by officers and were a product of informal ongoing engagement with partner organisations and the public.
11. This approach is in keeping with an iterative approach to planning, where learning during from one plan cycle informs the next. The intention is to maintain conversations and engagement throughout the Management Plan delivery period. An engagement action plan group has been established within the Authority with this as a key task, reported on through the Authority's performance management framework. Tailored discussions with a number of contacts will continue, for example, in regard to implementing equalities impact recommendations.
12. The opportunity to respond on the discussion paper was widely publicised. A range of stakeholders and partners from a list agreed at NPA 20th June 2018 were specifically notified.
13. A record of the groups contacted during the Discussion Paper consultation can be found at **Annex 2**.
14. The questionnaire provided as part of the Discussion Paper consultation can be found at **Annex 4** to this report.
15. The *Opportunities and Challenges* discussion paper and related documents (including the background papers) were available on the Authority's website. Reminders of the consultation were regularly promoted via the Authority's social media. The reminders also included promotion of an online (Survey Monkey) version of the questionnaire hosted on the Authority's website.
16. Fifty-one representations were received from nine individual / organisational responses (**Annex 5**).
17. Key opportunities and challenges identified at the conclusion of this stage were:
 - enabling ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment
 - conserving and improving soil health and enhancing natural carbon stores
 - addressing the impacts of invasive species and plant pathogens
 - reducing greenhouse gas emissions and adapting to climate change
 - reducing pollution from nitrates and ammonia
 - protecting dark night skies
 - managing risks to heritage assets, including historic landscapes

³ (1) Background Papers: Landscape, seascape, tranquillity and dark skies; (2) Well-being, equality and livelihoods; (3) Outdoor recreation and learning; (4) Nature conservation; (5) Culture and heritage; (6) Climate and energy; (7) Natural resources; (8) Legislation and policy.

- promoting Welsh language and dialects
- providing outdoor learning opportunities, in particular for children
- providing sustainable outdoor recreational opportunities for a full cross-section of society and increasing the frequency of participation
- managing potential / actual recreational pressures such as those arising from unauthorised camping and congestion

5. CONSULTATION ON THE DRAFT MANAGEMENT PLAN, ETC

18. The key opportunities and challenges identified in the *Opportunities and Challenges* consultation (listed above) formed the basis of the consultation draft National Park Management Plan 2020-2024.
19. Stakeholders with particular interests and expertise were involved in preparing consultation drafts of the Management Plan, the Sustainability Assessment / Strategic Environmental Assessment, and the Equality Impact Assessment. See **Annex 2** to this report for a record of organisational contacts etc. made.
20. The National Park Authority meeting of 30th January 2019 considered the draft Sustainability Appraisal Scoping report. Comments can be found at **Annex 6**. The final Scoping Report was consulted on with statutory partners for a period of 8 weeks. No comments were received.
21. Two Authority Member Workshops were held, on 20th February 2019 and 3rd April 2019 (see **Annex 7** for a summary of these).
22. Consultation drafts of the National Park Management Plan 2020-2024, Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Equality Impact Assessment were approved subject to comment at the National Park Authority meeting of 5th June 2019 (**Annex 8**).
23. A Habitats Regulations Assessment of the Consultation draft Management Plan was subsequently commissioned from DTA Ecology Ltd and its recommendations were taken into account in the final consultation draft Management Plan.
24. An assessment of impacts on the Welsh language was published as part of the suite of consultation documents.
25. Supporting information included the State of the Park Report (consisting of a consolidation of the *Opportunities and Challenges* background papers, with revisions) Interactive maps illustrated opportunities and challenges by Management Plan theme.
26. All documents were produced in line with the Authority's Welsh language scheme. English and Welsh Easy Read versions of the consultation draft Management Plan and questionnaire were commissioned from Learning Disability Wales.

27. The consultation documents went live on the National Park Authority's website on 1st August 2019. Interactive maps were published online, illustrating opportunities and challenges by Management Plan theme.
28. Leaflets promoting the consultation were available at the County Show (13-15 August 2019), in the Authority's Llanion offices (Reception) and via Summer Rangers (**Annex 9**).
29. The main consultation questionnaire is summarised at **Annex 10** (an Easy Read version of the questionnaire was also available).
30. An item about the consultation was provided for inclusion in *Coast to Coast 2019*.
31. Groups / organisations listed at **Annex 11** were directly contacted (most on 2nd August 2019) with a standard bilingual email to notify them of the consultation. The list includes organisations specifically identified as having an interest in and potential contributions to make to questions raised by the Equality Impact Assessment and Sustainability Appraisal. A duplicate reminder email to these (excluding the few that had already responded) was sent on 15th September 2019.
32. The second meeting of the Management Plan Reference Group (a partnership group involving senior representatives of the National Park Authority and relevant authorities) took place on 24th October 2019. Amongst other matters, key issues emerging from the Equality Impact Assessment were explored.
33. Reminders about the consultation were regularly promoted via the Authority's social media.
34. Fifty-seven representations were identified within the 9 individual / organisational responses, together with officer recommendations for taking them into account or otherwise (**Annexes 12 - 15**).
35. The representations can be characterised as follows:
 - clarifications to policy
 - minor additions to policy impacts
 - technical updates.
36. Recommendations for taking the comments into account were agreed, following discussion and comment, by Members of the National Park Authority (11th December 2019 meeting).

37. Those who responded to the consultation will be contacted with feedback on how their representations have been taken into account.
38. The final Management Plan and associated assessments will be published on the Authority's website, accompanied by interactive maps. We will continue to involve people in implementation and monitoring of the National Park Management Plan 2020-2024. Tailored discussions with a number of contacts will also continue, for example, in regard to implementing equalities impact recommendations.

APPENDIX 1 – ORGANISATIONS WHOSE VIEWS WERE SOUGHT ON THE ENGAGEMENT STRATEGY

Bold indicates that a response was received.

- Cadw
- **Dŵr Cymru Welsh Water**
- **Dyfed Archaeological Trust**
- National Trust
- Natural Resources Wales
- **Pembrokeshire Association of Voluntary Services**
- **Pembrokeshire Coastal Forum CIC**
- **Pembrokeshire County Council**
- **Pembrokeshire Nature Partnership**
- Pembrokeshire Sustainable Agriculture Network
- PLANED
- **Un Llais Cymru / One Voice Wales**
- Visit Wales
- Welsh Government

List of stakeholders / partners

People – National Park Authority	Comments	Log
Members of the Authority	Workshops and Authority meetings. Formal approval at key stages.	<ul style="list-style-type: none"> • The engagement approach and timeline were approved, with comments, by Members at The National Park Authority meeting of 20th June 2018. • Members were emailed 20/11/18 with details of the engagement opportunity / links. • Workshops with Members were held on 20th Feb 2019 and 3rd April 2019. A draft Management Plan was circulated to Members following the workshop for any informal comment by 5pm 25th April. • A draft Management Plan, Sustainability Appraisal and Equality Impact Assessment were brought to Members at their National Park Authority meeting 5th June 2019. (Comments made at that time and outcomes can be found in an annex to this report.)
National Park Authority staff	Email. Meetings. Drafting input / collaboration. Leadership Team approvals of key documents. Inform: Staff Meeting/Team Leaders meeting updates.	<ul style="list-style-type: none"> • Team Leaders were briefed on 22nd June 2018 and involvement invited. • Discovery Team Leaders were briefed on 12th Oct 2018. • Ranger Teams were briefed on 26th Oct 2018 and invited to use two questions about awareness and use of the National Park as conversation starters. • A presentation was made to the Authority’s staff meeting on 21st May 2019. • An NPA Ranger Team planning workshop focused on mapping recreational issues and proposing solutions 18th September 2019.
Volunteers	Separate meetings tend to be required for consultation	<ul style="list-style-type: none"> • Youth Ranger event was held 2nd December 2018. • Presentation was made to Activity

	<p>sessions, but could be embedded in regular sessions with some notice. Group session may require facilitation. Some may prefer questionnaires. Includes Youth Rangers. Potential for a National Park Authority Volunteer Forum.</p>	<p>Volunteers 22/3/19 at Pembrokeshire Archives. Following interest in further involvement, draft text was sent to Activity Volunteers for informal comment following the Authority Member workshop of 3/4/19.</p>
<p>UK protected landscapes Management Plan group</p>	<p>For information and any comment.</p>	<ul style="list-style-type: none"> The group of relevant officers in UK protected landscapes was emailed 27/11/18.

People - Service users	Comments	Log
<p>Access and Recreation</p>	<p>See Local Access Forum below. Also informal liaison mechanisms with recreational users (e.g. through Rangers).</p>	<ul style="list-style-type: none"> The Local Access Forum was emailed regarding the Discussion Paper on 20/11/18. The Local Access Forum was briefed at its meeting on 14/12/18 and representatives of the British Horse Society and Ramblers Association were subsequently (14/12/18) emailed with supplementary details of the consultation.
<p><i>Coast to Coast</i></p>	<p>Opportunity to inform and to invite people onto to mailing list.</p>	<ul style="list-style-type: none"> Text for an item to be included in 2019's <i>Coast to Coast</i> was agreed 19/11/18.
<p>NPA website</p>	<p>Opportunity to inform and to invite people onto to mailing list. Interactive maps.</p>	<ul style="list-style-type: none"> Discussion Paper webpage live from 20/11/18. Scoping Report live from 8/2/19.
<p>Planning</p>	<p>Issues arising from Local Development Plan preparation (National Park Authority and Pembrokeshire County Council) can be dovetailed with Management Plan</p>	<ul style="list-style-type: none"> NPA planning team input on the draft Discussion Paper. Planning colleagues in Pembrokeshire County Council were emailed 21st November 2018.

<p>Social inclusion / well-being / interpretation / social action and community projects</p>	<p>preparation.</p> <p>Opportunities where the National Park Authority hosts or attends events e.g. Family John Muir Award participants, Walkability.</p> <p>Existing structures of participation include School Governing Bodies, School Councils, Youth Assembly, 50+ Forum, Carers' Forum, Pembrokeshire Access Group, networks and forums facilitated by the Pembrokeshire Association of Voluntary Services and PLANED.</p> <p>Different approaches needed for different audiences but potential to combine groups / events. E.g. a 6th Form event could be combined with other young people as a special event.</p> <p>Potential to partner with Youth Service at e.g. skate parks.</p> <p>Feedback from above can feed into the Equality Impact Assessment of the Plan. Direct contact can be made with organisations working with people with protected characteristics (for example Pembrokeshire</p>	<ul style="list-style-type: none"> • Scolton Manor Play Day event held 1/8/18. • Ateb Big Day Out event held 17/8/18. • Travelling Ahead Gypsy Youth Forum event held 17/10/18. • Solva Care Event held 27/11/19. • Youth Ranger event held 2/12/19. • Community Connectors (Pembrokeshire Association of Voluntary Services) was emailed 4/12/18.
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	<p>People First, FRAME, Clynfyw, Value Independence, Hafal Crossroads, Mencap, VC Gallery, Croeso groups, Disability Sports Wales, Welsh Women's Aid, Hafan Cymru, Bro Cerwyn) and those facing barriers to accessing the National Park as part of equality impact assessment. Potential to arrange workshop for these organisations as part of this process looking at focused areas.</p>	
<p>Visitors to NPA sites and centres</p>	<p>Opportunity to inform and invite onto mailing list. Themes from TripAdvisor comments.</p>	<ul style="list-style-type: none"> Discovery Team Leaders were briefed on 12th Oct 2018.

Relevant authorities	Comments	Log
<p>Relevant authorities indicated at Section 62 of the Environment Act 1995.</p> <p><u>Management Plan Reference Group:</u> Amgueddfa Cymru National Museum Wales; Dyfed-Powys Police; Hywel Dda University Health Board; Mid and West Wales Fire and Rescue Service; Natural Resources Wales; Pembrokeshire County Council; Port of Milford Haven.</p>	<p>A partnership group involving senior representatives of the National Park Authority and relevant authorities.</p>	<ul style="list-style-type: none"> The Management Plan Reference Group met on 28th March 2019. Draft Management Plan text for informal comment was sent to members of the Management Plan Reference Group after the Authority Member workshop of 3/4/19. Members of the group were emailed at the start of the consultation and received the general reminder sent on 16/9/19. A second meeting of the group took place on 24th October 2019 where key issues emerging from the Equality Impact Assessment were explored.

Relevant authorities	Comments	Log
Environment Act 1995 Section 66 statutory notifications		<ul style="list-style-type: none"> Partners were emailed on 22/11/18 (contacts in Natural Resources Wales, Welsh Government, Cadw, Pembrokeshire County Council).

People - networks and partners	Comments	Log
Age Cymru	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Bluestone Foundation		<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Cadw	Also a statutory consultee.	<ul style="list-style-type: none"> Emailed regarding Discussion Paper on 22/11/18. Notified of Scoping Report 11/2/19.
Arwain Sir Benfro	Pembrokeshire LEADER Local Action Group, facilitated by PLANED.	<ul style="list-style-type: none"> PLANED was emailed regarding Discussion Paper 26/11/18 inviting circulation to the Local Action Group.
Town Teams for main towns (Pembrokeshire County Council)	E.g. Tenby, Haverfordwest, Fishguard, Pembroke, Pembroke Dock and Milford. Via Dan Shaw.	<ul style="list-style-type: none"> Phoned and emailed Pembrokeshire County Council contact regarding Discussion Paper 26/11/18.
Conservation charities	E.g. Amphibian and Reptile Conservation Trust, British Trust for Ornithology, Buglife, Bumblebee Conservation Trust, Plantlife, Royal Society for the Protection of Birds, Wildlife Trust South and West Wales. Potential for collaboration on	<ul style="list-style-type: none"> Email regarding Discussion Paper sent to all organisations listed on 22/11/18 and in addition the Freshwater Habitats Trust.

People - networks and partners	Comments	Log
	Sustainability Appraisal.	
Country Land and Business Association		<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network (on which the Country Landowner and Business Association is represented) on 6th Sept 2018. • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the Discussion Paper consultation opportunity at their meeting on 6/12/18.
Creating an Active Wales Network		<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Clynfyw Care Farm	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Darwin Centre for Biology and Medicine		<ul style="list-style-type: none"> • Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Destination Pembrokeshire Partnership	Pembrokeshire Tourism, Pembrokeshire Coast National Park Authority, PLANED and Pembrokeshire County Council.	<ul style="list-style-type: none"> • PLANED was emailed 26/11/18 regarding Discussion Paper, • A Pembrokeshire County Council contact was phoned and emailed regarding Discussion Paper 26/11/18. • Pembrokeshire Tourism was emailed regarding Discussion Paper 4/12/18.
Disability Wales	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Dŵr Cymru / Welsh Water		<ul style="list-style-type: none"> • Emailed Dŵr Cymru / Welsh Water regarding Discussion Paper 22/11/18. • Email correspondence (21/6/19 and 27/9/19) on potential linkages between the Management Plan and

People - networks and partners	Comments	Log
		forthcoming Welsh Water Drainage and Wastewater Management Plan.
Dyfed Archaeological Trust		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Dyfed Powys Police		<ul style="list-style-type: none"> • Management Plan review process introduced Rural Crime Partnership Group inaugural meeting 3/7/18.
Equality and Human Rights Commission	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Farmers’ Union of Wales	See also Pembrokeshire Sustainable Agriculture Network. Potential for collaboration on Equality Impact Assessment (see also Young Farmers).	<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network (on which the Farmers’ Union of Wales is represented) on 6th Sept 2018. • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the consultation opportunity at their meeting on 6/12/18.
Family Holiday Association	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Federation of Small Businesses	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Friends of the Pembrokeshire Coast National Park	Can a particular role be assigned? (20 th June 2018 NPA comment)	<ul style="list-style-type: none"> • Emailed 4/12/18. • A meeting with the Friends of the Pembrokeshire Coast National Park took place on 24th January 2019. A follow-up meeting took place on 26th February 2019 where it was agreed to seek the Friends’ views informally on draft Management Plan content. This was then sent following Member workshop of 3/4/19.
Future Generations Commissioner for Wales		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Gypsy and Traveller Communities in Pembrokeshire	Potential for collaboration on Equality Impact	<ul style="list-style-type: none"> • Workshop with Travelling Ahead Gypsy Forum at Carew Castle 17th

People - networks and partners	Comments	Log
	Assessment. Potential for heritage-based engagement e.g. looking at Pembrokeshire Gypsy and Traveller Heritage and the National Park/ views on landscape.	Oct 2018.
Harbours		<ul style="list-style-type: none"> • Saundersfoot Harbour contacted regarding Discussion Paper via relevant authorities group mailing list Carmarthen Bay and Estuaries European Marine Sites 22/11/18.
Housing associations	Drafting stage - attending Ateb's Big Day out to gather views of tenants/service users. Pembrokeshire County Council Housing department. In terms of engaging with tenants and service users most will have tenant participation or community development teams. They are also likely to be working on health and wellbeing projects.	<ul style="list-style-type: none"> • Ateb Big Day Out 17/8/18.
Hywel Dda University Health Board		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Keep Wales Tidy	Potential for collaboration on Sustainability Appraisal.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18. • Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation –

People - networks and partners	Comments	Log
		see 'Direct Contacts – Main Consultation' above.
Health Advocates Network	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Local Access Forum	Themes also emerging from Country Paths survey, path counter figures and feedback from the Rights of Way Improvement Plan consultation (May 10 th – 3rd August). Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> Local Access Forum was emailed regarding Discussion Paper 20/11/18. Attended the Local Access Forum on 14/12/18 and subsequently (14/12/18) emailed British Horse Society and Ramblers Association members with details of the consultation.
Maritime and Coastguard Agency		<ul style="list-style-type: none"> Emailed regarding Discussion Paper 4/12/18.
Menter Iaith Sir Benfro	<p>Potential for collaboration on Equality Impact Assessment.</p> <p>Role in engagement on the development of policies (20th June 2018 NPA comment).</p>	<ul style="list-style-type: none"> Opportunity to discuss / respond to Discussion Paper was raised at Menter Iaith's Board meeting 22/11/18. Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Merched y Wawr	Added as per NPA suggestion.	<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Ministry of Defence	Potential opportunity to present at meetings of the Ministry of Defence access and recreation and nature	<ul style="list-style-type: none"> Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.

People - networks and partners	Comments	Log
	conservation groups.	
National Farmers' Union of England and Wales	See also Pembrokeshire Sustainable Agriculture Network. Potential for collaboration on Equality Impact Assessment (see also Young Farmers).	<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network (on which the National Farmers' Union of England and Wales is represented) on 6/9/18. • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the consultation opportunity at their meeting on 6/12/18.
National networks and associations	With a view to identifying barriers, e.g. reasons for not visiting / accessing the National Park. Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
National Park Authorities (Brecon Beacons and Snowdonia)		<ul style="list-style-type: none"> • Issues were discussed at an early liaison meeting at Brecon Beacons National Park Authority 10/5/18. • Contacts at Snowdonia and Brecon Beacons were emailed regarding Discussion Paper 22/11/18 • See also table 1 re UK protected landscapes Management Plan group.
National Trust		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18
National Park voices		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper via the External Funding Manager 22/11/18
Natural Resources Wales	Potential for collaboration on Sustainability Appraisal. Also a statutory consultee.	<ul style="list-style-type: none"> • Emailed landscapes team regarding Discussion Paper 22/11/18, River Basin Management Plan contact, Natural Resources Wales members of Relevant Authority Groups; other senior managers emailed regarding Discussion Paper 22/11/18. • Notified of Scoping Report 11/2/19.

People - networks and partners	Comments	Log
		<ul style="list-style-type: none"> • A meeting with South-West Area Statement and Marine Area Statement team members took place on 30th May 2019.
Outdoor Charter Group		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Pembrokeshire Association of Community Transport Organisations		<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Association of Voluntary Services	See also Third sector organisations	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18
Pembrokeshire Coastal Forum		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18
Pembrokeshire College	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18. • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Co-production Network		<ul style="list-style-type: none"> • Efforts are being made by partners (including the National Park Authority) to reconvene the network after an inactive period. A meeting of partners was held 21/1/19.
Pembrokeshire County Council	Direct links to Wellbeing Plan, Conservation, Public Transport, Social Care, Education, Children’s Services, Youth Service, town teams. Also a statutory consultee.	<ul style="list-style-type: none"> • Pembrokeshire County Council contact phoned and emailed regarding Discussion Paper 26/11/18. • Planning colleagues in Pembrokeshire County Council were emailed regarding Discussion Paper 21/11/18. • Notified of Scoping Report 11/2/19.
Pembrokeshire Get Out Get Active, Disability Sport Wales		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Pembrokeshire Mind	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Nature	Potential for	<ul style="list-style-type: none"> • Partnership was emailed 27/11/18.

People - networks and partners	Comments	Log
Partnership	briefing/s with subsequent issues discussion.	<ul style="list-style-type: none"> • Discussion Paper was an item on Steering Group Agenda for December.
Pembrokeshire People First	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18. • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Preventions Programme Board	Potential for collaboration on Equality Impact Assessment. Particular links to Social / Green Prescribing.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Sustainable Agricultural Network	Briefing/s with subsequent issues discussion may be most effective. Pick up other specific land management interests through the network. Potential for collaboration on Equality Impact Assessment (see also Young Farmers)	<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network on 6th Sept 2018. • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the consultation opportunity at their meeting on 6/12/18.
Pembrokeshire Tourism		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Pembrokeshire U3A	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Voices for Equality	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Wildfire Group	Potential for briefing/s with subsequent issues discussion	<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network (on which the Pembrokeshire Wildfire Group is

People - networks and partners	Comments	Log
	may be most effective. Potential for collaboration on Equality Impact Assessment.	<p>represented) on 6/9/18.</p> <ul style="list-style-type: none"> • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the consultation opportunity at their meeting on 6/12/18. • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
PLANED	See also Third sector organisations and Pembrokeshire Sustainable Agriculture Network.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Port of Milford Haven	Potential for collaboration on Sustainability Appraisal.	<ul style="list-style-type: none"> • Contacted regarding Discussion Paper via the Pembrokeshire Marine Relevant Authorities group (29/11/18).
Public Health Wales		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Public Services Board	Potential for collaboration on Sustainability Appraisal. Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • A strategic Management Plan group will include Public Services Board members – see above. (Indicative list: Pembrokeshire County Council, Hywel Dda University Health Board, Dyfed Powys Police and Crime Commissioner, Mid and West Wales Fire and Rescue Service, Defence Infrastructure Organisation, Port of Milford Haven, Cadw, Dŵr Cymru Welsh Water, Natural Resources Wales, National Museum Wales Amgueddfa Cymru.) • Specifically identified contact for Equality Impact Assessment and Sustainability Appraisal consultation – see ‘Direct Contacts – Main Consultation’ above and notes on Management Plan Reference Group meetings.
Recreation Action Plan Group		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.

People - networks and partners	Comments	Log
Religious groups	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Relevant Authorities Groups: Pembrokeshire Marine Special Area of Conservation (SAC); Cardigan Bay SAC; Carmarthen Bay and Estuaries European Marine Sites		<ul style="list-style-type: none"> Briefed Pembrokeshire Marine Relevant Authorities Group on 17/7/18 and on 23/10/18. Briefed Carmarthen Bay and Estuaries Relevant Authorities Group on 1/11/18. Group was also emailed directly on 22/11/18. Pembrokeshire Marine and Cardigan Bay were emailed via the site officers (22/11/18) who both then circulated to their groups.
Steps 2 Health		<ul style="list-style-type: none"> Emailed regarding Discussion Paper 4/12/18.
The Environmental Network Pembrokeshire	Potential for collaboration on Sustainability Appraisal.	<ul style="list-style-type: none"> Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Town / City / Community Councils	<p>Can include all Pembrokeshire Town and Community Councils. Potential for a focused consultation / questionnaire as part of Plan preparation on identified issues. See also One Voice Wales.</p> <p>Include large neighbouring town councils (20th June 2018 NPA comment)</p>	<ul style="list-style-type: none"> All town, city, community councils in Pembrokeshire were emailed (or posted where no email) regarding Discussion Paper 23/11/18.
Third sector organisations that work with people who may already access the National Park, or could	E.g. Pembrokeshire People First, FRAME, Clynyfw, Value	<ul style="list-style-type: none"> See individual rows for Pembrokeshire People First, Disability Sports Wales, Pembrokeshire Association of Voluntary Services, and PLANED.

People - networks and partners	Comments	Log
potentially benefit from greater access to the Park	Independence, Hafal Crossroads, Mencap, VC Gallery, Croeso groups, Disability Sports Wales, Welsh Women's Aid, Hafan Cymru. Potential to work through Pembrokeshire Association of Voluntary Services and PLANED networks. Direct contact can be made with organisations as part of Equality Impact Assessment, potential to arrange workshop for these organisations as part of this process.	See events list for VC Gallery. <ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Transition Bro Gwaun	Potential for collaboration on Sustainability Appraisal.	<ul style="list-style-type: none"> Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Maintained schools within Pembrokeshire	One of the Public Service Board project themes is Celebrating the Great Outdoors. Potential to use the co-ordinating body for this project to engage with schools; potential to	<ul style="list-style-type: none"> To be implemented via the Public Services Board and Management Plan Reference Group.

People - networks and partners	Comments	Log
	contact governing bodies direct for better spatial targeting.	
One Voice Wales		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Visit Wales	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18. • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Wales Council for Voluntary Action		<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Welsh Government	Various departments (wellbeing, renewables etc). See also Visit Wales. Also a statutory consultee.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18. • Notified of Scoping Report 11/2/19.
Welsh Language Commissioner		<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
West Wales Action for Mental Health		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
West Wales Biodiversity Information Centre	Potential to involve County recorders via the Centre.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Women’s Institute - Pembrokeshire Federation	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Young Farmers Pembrokeshire	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Opt-ins from events	Comments	Log
Separate list of personal contact details (22 contacts)	“Event opt-ins – personal details”	<ul style="list-style-type: none"> • All emailed (or posted where no email) regarding Discussion Paper 23/11/18.

Organisations contacted in drafting the stakeholder list	Comments	Log
<p>Cadw, Dyfed Archaeological Trust, Dŵr Cymru / Welsh Water, Natural Resources Wales, National Trust, Pembrokeshire Association of Voluntary Services, Pembrokeshire County Council, Pembrokeshire Coastal Forum, PLANED, Pembrokeshire Nature Partnership, Pembrokeshire Sustainable Agriculture Network, Un Llais Cymru / One Voice Wales, Visit Wales, Welsh Government.</p>		<ul style="list-style-type: none"> All emailed regarding Discussion Paper 22/11/18.

APPENDIX 3 – OUTPUTS OF GROUP EVENTS

Scolton Manor Play Day 1st August 2018

Summary

What's important

Coastal / beach access, countryside access.

Concerns and suggestions

Included: cleanliness; parking cost (reduce / make free) and availability; low cost / free family friendly / organised activities; toilets; dog-free beaches; promote the National Park in schools and on local radio.

Notes on conversations

What's important	What could the Authority do differently
Coast Path	
Having places to take the dog. Good camping sites.	
Being able to get outside with family and children – coast and countryside.	
Beaches and coastal path	
Access to beaches, coastal path, historical sites. Bus services	Promote Park on local radio.
Being out and cleanliness	More family activities.
The beaches	
That it's clean and accessible	
Keeping it tidy. Making it family-orientated.	Provide free parking.
Health of walking. Birds and flowers. Looking after the paths. Keeping it wild.	
Exploring, going off the beaten track.	More family activities.
Learning respect for nature, ways of conserving	Doing a great job.
Wildlife. Opportunity for children to enjoy.	Doing a great job.
Finding out about natural world. Involving the children.	Promote more in schools. More children's activities. Re-open Tenby Information Centre.
Access	Improve coast path repairs
Keeping it tidy. Taking rubbish home.	More bins.
Opportunities for children to get out and be in the fresh air.	
Dog-free beaches to play on.	Ban dogs on beaches. Enforce rules where they exist. Some children are scared.
Access for children. Keeping it open.	Improve amenities e.g. public toilets and

	water points.
Cleanliness and accessibility. Free toilets.	More dog-poo bins.
It's relaxing. Wildlife and seals.	
Open space for adventure for children.	
Access to coast and countryside.	Maybe an email update list for family activities. Information more readily and clearly available (not purely Facebook).
I like what NPA does. Especially warden service.	Charge less for locals for car parking especially if not there for a whole day.
Clean countryside and beaches. Parking pass for locals.	Parking charges – not just National Park, National Trust and Pembrokeshire County Council - yearly pass.
Clean beaches. Economy – needs to be developed.	More free / cheap events for local people (kids).

Ateb Big Day Out 17th August 2018

Summary

What's important

Coastal / beach access, peace and quiet, heritage.

Concerns and suggestions

Included: transport barriers – provide bespoke days out; information about local routes; Pathways welcome but limited for some by school hours; more activities for school children especially 8-14 year olds; access over pebbles at Newgale is difficult.

Notes on conversations

What's important	What could we do differently
Clean generally but needs to be looked after. Get out with the kids several times a week. Beaches, woods, Withybush.	More clubs etc. in schools. Make a Pathways project suited to parents constrained by school hours. Parking passes for residents.
Coast Path e.g. Martin's Haven – Solva stretch.	All good.
Natural places to visit. Pathways gives me fresh air, self-esteem, pride in doing the movie.	Provide access for wider range of people – those with no transport, young people. Improve access by bus. Provide more info on linking population e.g. Pembroke Dock to the National Park by footpaths / gateways. Best route to take on foot / bike.
Have a car, go to Neyland, Llys y Fran, beaches (Broadhaven North). Enjoy walking.	Do more to let people know where they can find NPA Facebook resources (beyond the normal page).
Know very little about the National Park. Go to beaches (often Broadhaven). Kids love it – that's the main reason. Walk days in local woodlands.	Transport is a big issue, so we have to get to beach on bus / taxi. Help somehow with more accessible places by bus. E.g. annual big day out - free bus to somewhere further afield.
Beaches - Newgale	Access over stones at Newgale is difficult.
Love beaches and countryside but options are limited for entertaining the children at their current ages.	More provision for 8-14yr olds.
We need to look after it. We get out with the kids. One child is autistic and enjoys the peace and quiet.	Communicate more about what the NPA does (limited knowledge about NPA).
Children – environmental education. Environment – development and change. Heritage – like industrial and military heritage. Caldey. Would like to visit other islands.	Parking capacity – car parks get full in season.
Beaches. Drive but would rather walk.	Litter. Picnic area and toilet provision.
Always used to go out, not like kids	Advertise more of what we do on

today. When I'm outside I feel much better (natural places).	Facebook. More help with transport.
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Summary

What's important

Family, recognition of health benefits of recreation, dog-walking, horse riding.

Concerns and suggestions

Included: the Authority could go to schools more often; provide more project work / outdoor learning opportunities; provide activities related to horse-riding / horse driving, cooking outdoors.

Background:

Travelling Ahead is a Welsh project working with young people and families from Gypsy, Roma and Traveller communities to give them a voice about the things that matter to them. This day was partly planned as an annual get-together with some fun activities, alongside some workshops (from the National Park Authority, Police Commissioner and National Theatre).

Our workshop was an opportunity to consult with the young people on the Gypsy community's level of understanding and engagement with the National Park and the work of the Authority. Workshop attendance was left to the choice of the participants – 11 chose to attend this one.

Engagement plan

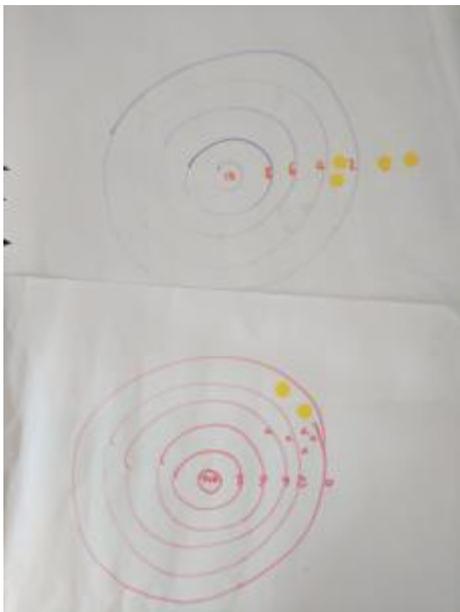
The Management Plan consultation was distilled down to two key questions:

1. How important is the National Park to you?
2. What could the Authority do differently?

A workshop exploring these questions allows us to explore many other questions – including: What is the National Park? Where is it? What can you do there? What do you like doing? What benefits do you get from this kind of activity?

The workshop was planned as a series of short activities that explored various of these issues.

1. How important is the National Park to you (using target 0-10 and stickers)



Scores showed that there is a low level of importance attached to the National Park. Discussion showed that there was a low level of awareness of the National Park / existence of a National Park Authority or what they are.

2. Where is the National Park? (asked to show on a map outline)



Initially no-one was able to mark the location of the National Park. Two people indicated that Carew (this workshop's location) was National Park.

Several suggested that the whole county was a National Park. When prompted to think about our name it was suggested that coast was important.

Once a map of the county / National Park boundary was shown there was a rush to draw on their own map.

3. **A. What activities can you do in the National Park?** (Looking through *Coast to Coast*)
B. What would you like to do in the National Park?



Lots of answers were suggested – based upon what they could see people doing.

When asked which of these activities they would enjoy, most adventure activities and exploring nature seemed popular, along with anything to do with horse-riding. Walking was not popular.

In discussion it emerged that there was an understanding that these activities were good for health, wellbeing and quality family time.

There was very little recognition of the special qualities (especially history / culture other than that of Gypsies), or the importance of biodiversity and conservation.

4. How often do you go to the National Park?

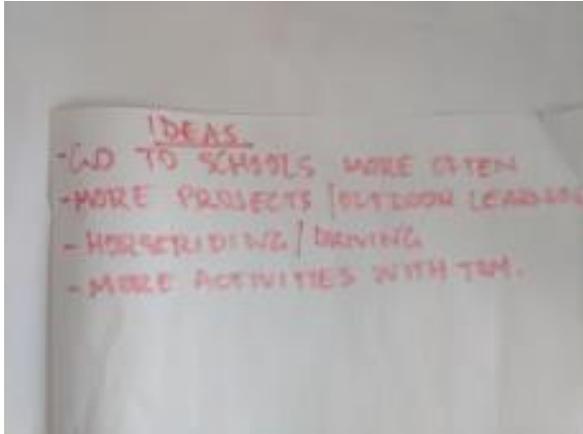


A large number of those taking part go to school in Tenby and live in Kilgetty – so they indicated that they go daily.

When discussed in more depth, there was a low frequency identified, apart from one who said she walked the dogs on the beach often with her dad, and another who rode horse on the beach monthly.

Several mentioned that they had been to Castell Henllys when in primary school.

5. What could we do differently?



It was clear that there is very little awareness of the National Park or the Authority's work. None said they had read *Coast to Coast*, looked at the Authority's website or social media. The only context anyone seemed to have come into contact with us was through school trips to Castell Henllys, or through previous outreach work done with the Travelling Ahead project.

It was suggested that the Authority could:

- go to schools more often
- have more project work / outdoor learning that they could do, or more activities like the event today.
- things to do with Horse-riding / horse driving. Also cooking outdoors.

Notes

- Staff and children liked the event - crabbing, venue and they would like to come again - possibly to a different venue (although Carew was handy as near Monkton / Kilgetty / Carmarthen where most attendees came from.
- Note Gypsy culture around cooking issues – e.g. not eating food not prepared by another Gypsy.

Summary

Concerns and suggestions

Included: cost of car parking; sharing car park proceeds; more wheelchair accessible routes.

Background

Solva Care is a not for profit social initiative, which has been set up by Solva Community Council to offer friendly, local support and help to those who need it in Solva and the surrounding area. It is a community based project focusing on social care. It was set up in 2015, in response to wishes of the local residents, to support individuals and families with a variety of services. The initiative has been extended following the success of the Pilot Project.

The aims of Solva Care are to maintain and improve health and wellbeing by:

- enabling residents to stay in their own homes and remain part of the community
- offering a way to counteract loneliness, isolation and social disadvantage
- providing extra support for those who are caring for relatives

The Event

Aim was to provide community with information about relevant organisations and services.

Approximately 25 community members took part in the session. They were all older people (50+) – some were active members of the community (including Community Council Members), and some were in receipt of support from Solva Care.

The approach

I decided to use an interactive approach and distributed 8 flipcharts to different tables. There was an outline map of Pembrokeshire and space to write. I then asked groups to respond to questions using the charts and then brief discussions were held. This was accompanied by a brief presentation illustrating the discussion points

- Where is PCNP?
- How many NPs are there in the UK?
- Why do areas become designated as NPs?
- What services does the NPA provide?
- What projects do we provide that could be accessed by the community?
- What could we do differently?

The response

In discussion all were aware of Coast to Coast, only three (of c30) had ever used website.

Where is the National Park?	Responses showed generally very good awareness of the coastal areas of the National Park, less so the Daugleddau and hardly any identification of the Preseli Hills area. Some thought all of Pembrokeshire.
How many National Parks	6-9

are in the UK?		
What are the qualities that made this a National Park?	Natural beauty / landform Geology Scientific interest Environment / nature / marine and terrestrial wildlife History Unspoilt	
What services does the Authority provide?	Planning Regulation / policies / protection Maintenance of environment / conservation Access / paths / signage / safety Car Park provision Marketing / promotion / tourism / economy Druidston? Provide activities / walks / talks / events Education Volunteering	
	No specific awareness or mention of Ranger service / individual projects.	
What could we do differently?	<ul style="list-style-type: none"> • Stop proliferation of masts / turbines • Free Parking for taxpayers / car parks! / share management of Solva Car Park / let communities run their own car park, no pay and display as employs local people / share profit • Reinststate toilets / proper disabled (changing etc) toilets • Perception of inconsistency in planning decisions • Guided dogwalks (as done on St Davids Airfield) • Develop more wheelchair accessible routes / services • Improve poor signage (Solva area?) • More buses (like Bws y Bobol, trips to supermarket) • Tree management (thin young trees to maintain Solva views) • Help to provide local workshops for entrepreneurs / local business • Decision making / ownership / information source / planning 	

Local Community Councillors reported that they were engaging with online consultation.

Summary

What's important / use of the National Park

The National Park as a resource for wellbeing, enjoyment and learning.

Concerns and suggestions

Included: transport is a barrier for young people; there should be more opportunities for practical outdoor work with agencies acting in an integrated way; young people have to move away from the area; consultation is tokenistic; Authority should promote accessible routes from population centres; promote the National Park to young people; colour-coded routes; use local people to test Authority projects and involve them in projects; biodiversity restoration; farming methods – support sustainable local food; more Authority outreach to children and families; more Authority focus on contemporary culture, also on oral history; less Authority emphasis on beach cleaning, more on lobbying and exerting influence pressure at policy levels.

From 5 Youth Rangers aged 19 -26

National Park – a landscape for life and livelihoods

Transport is a big barrier – can the Authority influence / collaborate to improve this

- Work
- Social
- Health

Experience of practical work outdoors

- We think there should be more opportunities for wider range of people
- For all

College landscape and environment course (attended by 4 of the 5)

- Doesn't equip you for work – need practical tickets e.g. chainsaw
- Problems with course being full of people who don't want to do it / mess about. Bit of a dumping ground.
- Should be tailored to actual local jobs, including placements
- Big organisations not involved (apart from providing some practical tasks). Should be involved strategically.
- One Youth Ranger found placement himself as tutors couldn't / wouldn't
- Avoid tokenistic self-evaluation etc. on learning basic skills etc. - too much reflecting, not enough doing (school and college)
- College = business, learners' needs not topmost priority.
- Quality of training and opportunities is low
- Everything needs to be more connected and related to getting a job (school, college, volunteering)
- People employed in industries often can't afford to take on apprenticeships – need support

- Many jobs taken by people from outside the county - weighting/preference given to local people?
- Pembrokeshire – better place to bring up a family (as long as you have a car etc.) – we want to stay here but probably have to move
- No more tokenistic consultation

Landscapes for Everyone

- We use for our wellbeing, enjoyment and discovery
- Transport barrier – need more promotion for those without– Places you can walk to
Really good maps would be good – accessible routes for all from population centres
- Advertised badly (to young people / locals)
- Coast to Coast – look at occasionally. Not really for us.
- “Visit Pembrokeshire” book available in Devon but not here - why?
- Awareness is low of how/why to access landscape amongst young people
- Footpaths – signage missing (farmers remove? Work better with them?)
- More info in libraries
- Colour-coded signage e.g. colour-coded routes for people to follow circular routes)
- Map of these routes in every village
- Community walks. Create routes if not there already
- Use local people to test out everything (walks, projects, marketing, sites etc.)
- No more tokenistic consultation

A Resilient Park

- Restoring biodiversity
- All think important
- New farming methods needed
- Authority should be doing more – outreach to communities e.g. pollinator friendly verges, green spaces.
- More outreach to people from very young, school, families
- Joined up-ness with Pembrokeshire County Council e.g. Scolton – not much conservation work – should be a hub for engagement/training in environmental / access etc. (central venue e.g. Scolton)
- No more tokenistic consultation

A Place for Culture – Celebrating heritage

- Very important for some, not so much for young people
- NPA focus too much on ancient culture, not contemporary culture
- Enjoy culture, but seems a bit like Culture = Castles
- More local culture in history curriculum
- Need more intergenerational/oral history – get local kids understanding local history and culture
- Need more of this stuff in teenage years – relevant to them

Global Responsibility

- Managing natural resources sustainability

- Farming practice should better encourage and support local sustainable food
- Keep prices down to allow young people to engage in e.g. local food, low plastic etc.
- Less emphasis on beach cleaning (although fun and makes a difference) – should be more use of Authority’s lobbying potential to change laws, policy and practice
- More regional/national/international political pressure rather than people moaning individually
- Local action should follow national political lead (whilst retaining local voice!)
- Consumerism and capitalism are the issues
- No more tokenistic consultation

<p>National Park Management Plan 2020-2024 <i>Opportunities and Challenges</i></p>	<p>Ref:</p> <p>OFFICE USE ONLY</p>
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About you (please refer to the data protection information above)

Name	
Organisation (if applicable)	
Address	
Email	

Comments

Please provide paragraph reference(s) and/or specify locations in the National Park where relevant.

1. Does the discussion paper include all the relevant Opportunities and Challenges? Should any be removed?
2. What additional Actions are needed? Should any be removed?
3. Who should be involved in delivering the Actions? (please provide the relevant action reference)

I **do not** wish my name to be published with my response
Please post or email your comments to:

Head of Park Direction
Pembrokeshire Coast National Park Authority
Llanion Park
Pembroke Dock
Pembrokeshire
SA72 6DY

Email: devplans@pembrokeshirecoast.org.uk

Closing date for comments: 5pm Friday 4th January, 2019

Thank you for completing this questionnaire.

Q1. Does the discussion paper include all the relevant Opportunities and Challenges? Should any be removed?

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP001	<p>No</p> <p>In general - Ensure that the Management Plan and LDP cross reference effectively with each other to ensure policies/plans/actions in each document are supported by the other (where appropriate) and that actions are SMART.</p>	<p>Cross-references to Local Development Plan 2 should be used as appropriate in the consultation draft Management Plan.</p> <p>The consultation draft Management Plan should express the desired results of policies and / or initiatives clearly for their consideration in the NPA's and partners' corporate planning.</p>
DP002	<p>If some recreational pressure is to be diverted to alternative locations within the park where it's felt capacity exists, how has this capacity been identified/measured and will effective monitoring be put in place to ensure carrying capacity is not exceeded in these locations?</p>	<p>This is an issue which the consultation draft Management Plan will need to engage with.</p> <p>Stakeholders (including landowners, communities and users) work together to monitor sites and seek to address carrying capacity and congestion issues. Displacement of impacts to other sites is a potential issue.</p>
DP003	<p>If the National Park intends for Oriel y Parc to become an eastern gateway to St Davids, beyond which traffic flow is to be restricted by active or passive means, this should be identified within the Management Plan.</p>	<p>The National Park Authority, along with partners including Pembrokeshire County Council (as the lead authority for traffic management), the RNLI, RSPB and St Davids City Council, is currently looking at traffic management issues within St Davids and the wider</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
		peninsula. The recent improvements to Glasfryn Road may assist in relieving congestion within the city by diverting through traffic.
DP004	User pressure is identified in Map 4 without any detailed explanation. The source is: Pembrokeshire Coast National Park Authority, by internal consultation with officers . This is not explained in detail in the background paper ⁴ and a similar view isn't extended to St Davids? The available from column needs to be completed with the data source.	The mapped areas are based on NPA staff and partner organisations' knowledge of potential / actual rural recreation / vehicle management issues and relate primarily to rural areas.
DP005	The discussion paper should cross-refer to the detail provided in the Authority's ' A Plan to provide and manage opportunities for Sustainable Recreation in the National Park ⁵ . 2.2.1 Capacity and Congestion. Many smaller coastal locations can get extremely congested at peak times, with visitor traffic including caravans and boat trailers arriving along small roads and launching from a limited number of sites. This is exacerbated where locations are used for several activities, where access is limited to single-track roads and where parking is limited. The recreational hot spot sites around St Davids Peninsula (such as Abereidid	Reference to the issues and challenges identified in <i>Enjoying the Pembrokeshire Coast National Park. A Plan to provide and manage opportunities for sustainable recreation in the National Park</i> (2011) should be included in the <i>State of the National Park</i> background paper accompanying the Management Plan.

⁴<https://www.pembrokeshirecoast.wales/Files/files/Management%20Plan/3%20Outdoor%20recreation%20and%20learning.pdf> Accessed 17/12/2018.

⁵<https://www.pembrokeshirecoast.wales/Files/files/PCNPA%20Recreation%20Plan%202011%20Low%20Res.pdf> Accessed 17/12/2018.

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	Porthgain, St Justinians and Solva) and around the Dale Peninsula (such as Martin's Haven, St Bride's Haven and Dale) can become congested at peak times.	
DP006	Yes, it is a good document. However emphasis on adverse human impacts – Climate Change, pollution, waste, nitrogen, could be given greater prominence. Particularly in relation to importance in the plan of PCNPA direct engagement with visitors, visitor-hosting venues/properties, etc also with NP residents, on ways in which they both contribute to causing – and consequently also potentially to providing solutions. PCNPA plan could usefully incorporate even stronger sense and actions aimed at influencing visitors/residents (everyone) on mitigating environmental impacts. (see comment below). <i>[See also DP040 below.]</i>	The consultation draft Management Plan should include an overview of the key opportunities / challenges early on in the document. Opportunities to influence behavioural change / awareness and, where appropriate, desired policy impacts, should be reflected for the themes of biodiversity and natural resources management in the Management Plan.
DP007	Many thanks for the opportunity to comment on this paper, which will feed in to the Management Plan Review. I have not put my comments into your questionnaire since it asks directly about the challenges and opportunities whereas my comments relate to wider matters. Plus I have forwarded some relevant information [Officer comment: Ammonia and Natura 200 sites, Action to address climate risks to the Historic Environment, NRW's Carbon Positive project] which may also have a bearing on the challenges and opportunities going forward.	Noted. Supplementary information received with thanks.

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP008	NRW welcomes this discussion paper which may lead to enhanced engagement with a wider range of stakeholders and therefore a more robust Plan. Use of social media seems to have helped stimulate communities in Snowdonia to respond to their recent similar consultation. The emphasis on wellbeing and natural resources management is especially welcome.	Noted. The potential of social media should be used where appropriate to involve people in the Management Plan process including delivery and ongoing discussion / awareness-raising.
DP009	The Area Statement process has gathered environmental data and also seeks to identify challenges and opportunities, but for a much broader area. There will be informal consultation in the coming months. The data & evidence could be very helpful to the National Park, and at least frame a wider context for the Management Plan.	The consultation draft Management Plan should where appropriate and possible refer explicitly to Area Statements priorities (note – Area Statements are not expected until after the Management Plan is published).
DP010	The background papers underpinning this discussion paper provide some useful ‘state of’ data but it would also be helpful to have more consistent trends analysis as should be contained within a State of the Park report. Reference is made in the paper on page 6 section 1.13 to ‘outcome and impact measures to identify direction and rate of travel’. Are these measures available to help review policy effectiveness? We would welcome discussion about the best way to evaluate progress and highlight challenges and opportunities.	To avoid duplication, the consultation draft Management Plan should look to national and regional interpretations of data such as those referred to in the representation to determine where focus should be. Local issues may require local data / interpretation. The consultation draft Management Plan should seek to define the policy impacts required. Authority-specific outputs and impacts will continue to be monitored through the Authority’s corporate planning framework, of which the Management Plan forms a part. Note: a telephone conference with the respondent took place on 19 th March 2019.

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP011	<p>The paper sets out the relationship between the LDP and the Management Plan but does not include reference to the Wellbeing Plan here, nor its relationship to the Management Plan. This could be helpfully clarified with a view to demonstrating how the Park contributes to wellbeing locally, regionally and nationally. It may be a useful exercise to present evidence in the Management Plan on how the Special Qualities of the Park contribute to wellbeing.</p>	<p>The Pembrokeshire Well-being Plan and the well-being goals are referred to in action example WB1 in the discussion paper and in a number of the background papers, (e.g. “Well-being, equality and livelihoods”, “Outdoor recreation and learning” and “Legislation and policy”).</p> <p>The consultation draft Management Plan should ensure that its relationship to the Pembrokeshire Well-being Plan is clear and should set out the ways in which the National Park contributes to well-being.</p>
DP012	<p>The area based approach proposed by the NP Authority is noted. The paper could also usefully reflect the other Natural Resources Policy priorities namely delivering nature based solutions and increasing renewable energy and resource efficiency. Realistically National Park management is about delivering multiple benefits derived from conserving and enhancing natural beauty and despite the competing priorities this comes across clearly in the discussion paper. We look forward to working with you to review the Management Plan and would welcome a meeting to discuss how we can best assist you.</p>	<p>The Management Plan should reference Natural Resources Policy priorities.</p> <p>The offer of working together is welcomed and a telephone conference with the respondent took place on 19th March 2019.</p>
DP013	<p>I think that all the relevant Opportunities and Challenges have been included and none should be removed.</p>	<p>Noted.</p>
DP014	<p>Page 10 Table item on Permissive path. To note that some shared use paths are for horse-riders also. However, cycleways generally are not available for equestrians. Page 11 Table item on Public Rights of Way. Same point as</p>	<p>Amend definition of permissive path in the consultation draft Management Plan to: “In addition to Public Rights of Way and shared use paths for cyclists and pedestrians, there are also many permissive paths in Pembrokeshire. These can take two forms. The first</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	above.	<p>arises where a landowner agrees to allow the public to pass along a defined route, which is not a Public Right of Way. The second is where a landowner allows higher rights to be exercised along a Public Right of Way than those legally attributed to the route, such as permitting horse riding and or cycling along a public footpath.”</p> <p>Amend definition of Public Rights of Way in the consultation draft Management Plan to: “A collective term for footpaths (a public right of way over which there is a right to pass on foot only); bridleways (a public right of way over which there is a right to pass on foot, bicycle and riding or leading a horse); Byways Open to All Traffic (a public right of way open to all types of user, including horse drawn carriages and motor vehicles); restricted byways (a public right of way which has bridleway rights of passage together with non-motorised vehicular rights of passage) and Shared Use Paths (dedicated routes shared by cyclists and pedestrians and sometimes horse riders, often alongside roads but also extending into the countryside).”</p>
DP015	Page 15 / 16. Example actions. Perhaps refer to the emerging Welsh National Marine Plan in this table?	The consultation draft Management Plan should refer to the Welsh National Marine Plan where appropriate.
DP016	Page 22. General comment about the maps from this page onwards. The maps are very informative, but quite busy. There is sometimes too much information presented to allow easy interpretation.	<p>Any paper maps associated with the consultation draft Management Plan should be simplified.</p> <p>It is intended that interactive maps are published on the National Park Authority’s website in support of the consultation draft Management Plan.</p> <p>Note: an interactive map was available online as part of</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
		the 'Opportunities and Challenges' consultation.
DP017	P8 – definition of biodiversity includes diversity within and between species, of ecosystems and the processes which underpin them.	Amend the definition of biodiversity in the consultation draft Management Plan.
DP018	P9 – the definition of resilience also includes ability to ADAPT to perturbation.	Amend the definition of resilience in the consultation draft Management Plan.
DP019	P10 – INNS impacts biodiversity and / OR human society.	Amend the definition of invasive non-native species in the consultation draft Management Plan.
DP020	P11 – Public goods. There is something here I can't put my finger on about public goods being something where the only logical 'buyer' or 'custodian' is government as it is not something for which there is a market....such as air quality.	Welsh Government has proposed a Public Goods Scheme in its Brexit and Our Land" consultation in 2018. The consequence of a Public Goods Scheme (or equivalent) should be reflected in the consultation draft Management Plan as necessary.
DP021	P17 – E1. It would be worth mentioning the role of NRW in assessing the condition of protected sites and the paucity of such data. Consequently, if it's a PCNPA target to meet favourable condition, it places increased burden on PCNPA in terms of first establishing and then monitoring condition.	Noted.
DP022	P18 – EC7 is a bit 'NRW speak'. What would this actually look like?	The phrase "place-based" appears in Welsh Government's Natural Resources Policy (2017) ⁶ where the approach is described as a "focus on collaborative working to deliver better results at a local level" (p17). Area Statements and designated landscapes are viewed as playing "a key role in identifying local opportunities and constraints linked to the national priorities" (p17). The consultation draft Management Plan should include

⁶ <https://gov.wales/docs/desh/publications/170821-natural-resources-policy-en.PDF>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
		clarification of the term “place-based” in the glossary.
DP023	P19 – H5. Local distinctiveness in the natural environment is also an element of heritage and should be referenced.	Noted.
DP024	P20 – there is strong correlation between N3 on soils and N1 on water quality in terms of both nutrients and suspended solids / siltation.	Noted. Wherever appropriate the consultation draft Management Plan should seek to present integrated policy responses to identified opportunities / challenges.
DP025	P21 – NRM5 is a highly specific action relating to a single project, whereas the others are far more broad brush. Risk if BRICs project fails. Likewise NRM6 for the SWEPT project.	Noted. The consultation draft Management Plan should where possible present policies, desired policy results and actions / initiatives to implement policy at a consistent level of scale. However it is anticipated that this will not always be possible, e.g. where policies are narrow in focus and / or are implemented through a limited number of focused actions.
DP026	Generally, there is a missed opportunity in education and awareness raising around the importance of biodiversity, ecosystem services and ecosystem resilience to get public buy in to their conservation. Actions would sit in the SMNR section (P20) or the biodiversity section (P17), or both. Working with tourism businesses and/or farmers to help them understand the value of a sustainable environment to the sustainability of their business model would be an example. The ‘Naturally Connected’ project did this and there may be potential if a Visitor Giving scheme comes to fruition.	Noted. Opportunities to influence behavioural change / awareness and, where appropriate, desired policy impacts, should be reflected for the themes of biodiversity and natural resources management in the Management Plan.
DP027	Response A: Re: 6 Managing natural resources sustainably N6: Encouraging use of public transport and active travel. Action Reference: NRM9 Collaborate in public transport, active travel and low-carbon vehicle initiatives. Re: Map1 Poppit Sands to Dinas Cross	

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	<p>This Map needs amendment re the extent of the Active Travel Act. We are very concerned that Map 1 shows the Cardigan Active Travel Designated Locality extends only from Cardigan to St Dogmaels village boundary. Cardigan Town Council & St Dogmaels Community Council are working together to ensure the Active Travel Area extends to Poppit Beach. Active Travel Act Guidelines include Active Travel to places of leisure such as beaches and the boundary of the Pembrokeshire Coast National Park. Please amend Map 1 to show Active Travel area extends to Poppit Beach.</p>	<p>The maps supporting the consultation draft Management Plan should be amended to reflect any necessary active travel area boundary and route changes.</p>
DP028	<p>Response B: Re: 6. Managing natural resources sustainably: Opportunities and challenge N7: Promoting waste efficiency through the waste hierarchy There is no mention of reducing waste only promoting waste efficiency.</p> <p>Example Action must be:</p>	<p>The description of the waste hierarchy on page 12 (terms explained) is: “An order of preference for action to reduce and manage waste; for example prevention and minimisation of waste are preferable to energy recovery or disposal.” No amendment is proposed.</p> <p>The National Park Authority’s environmental policy is currently being updated (January 2019).</p> <p>The Authority is working with Pembrokeshire County Council, Keep Wales Tidy and Danfo on development of</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	<p>Make Oriel y Parc more walker & environmentally friendly and provide an accessible tap for walkers to refill their water bottles.</p>	<p>water refill stations, with a number of sites under consideration for a pilot scheme and work due to be carried out next financial year. The work is being supported by funding from Visit Wales and Welsh Government.</p>
DP029	<p>Response C: Re: 4.Restoring biodiversity E 5 Preventing and mitigating the impact of invasive non-native species, pests and pathogens EC 4 Manage invasive non-native and /or harmful species in line with the Pembrokeshire Nature Partnership’s Invasive Non-Native Species action plan (see map key for active catchment controls for key terrestrial invasives).</p> <p>We are disappointed that the on-going work by Cymdeithas Llandudoch/St Dogmaels Community Association since 2011 over 18 acres of Poppit Marsh, managing Himalayan Balsam & Japanese Knotweed which has been supported by PCNPA and was the foundation for PCNPA’s ‘Stitch in time’ programme must be acknowledged by adding it to Map1. This on-going work was visited by the Minister for the Environment & recognised & acknowledged in the Welsh Assembly as an exemplar model for managing non-native invasive species This autumn [edit: the PCNPA Biodiversity Officer] offered assistance with the future ongoing work of managing invasive species at Poppit, therefore this work has to appear on Map 1.</p>	<p>Agree. Communities should be able to designate target catchments for action where they are happy to lead.</p> <p>The relevant catchment should appear as an invasive species action area in relevant maps associated with the consultation draft Management Plan.</p>
DP030	<p>Response D:</p>	

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	<p>EC6 Manage wildfire risks Map 1 does not show Firebreak cutting in the Poppit Sands Dunes – it must be added to Map.</p>	<p>Agree. A marker will be added at Poppit Sands.</p>
DP031	<p>3. Well - being, enjoyment and discovery WB3 Manage the Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, to provide a diversity of experiences and promote it to new audiences WB4 Implement the Annual Delivery Plans for the Rights of Way Improvement Plan 2018 2028 (e.g. providing a more continuous network and making targeted accessibility improvements) and increase community, user group and volunteer involvement in the improvement and management of public paths.</p> <p>Response E: WB4: So pleased to see 'increase volunteer involvement in the improvement & management of public paths' As Secretary of St Dogmaels Footpath Association I am pleased to see acknowledgement that volunteers can contribute (and need encouragement etc). Draft RoWIP2, in contrast, says there is no financial resource to have community involvement. PCC Footpaths Dept fail to see that there may be cost savings if you support & encourage community involvement eg in the last year St Dogmaels Footpath Association has cleared 16+ trees that had fallen & were obstructing paths and also done path clearing &</p>	<p>The Rights of Way Improvement Plan 2 (jointly published by Pembrokeshire County Council and the National Park Authority) acknowledges the scope to achieve greater community and volunteer involvement in the improvement and management of Public Rights of Way. It is clear that the authorities require more staff resources in order to realise the potential of the voluntary sector, and objective E of the Rights of Way Improvement Plan 2 provides solutions to this end including aspirations for the National Park Authority Ranger service to work across the county in the</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	sweeping.	management of public rights of way with communities, user groups and client groups.
DP032	<p>Response F: WB4: Re: ‘Providing a more continuous network’ Re Map1 Poppit Sands: We are very concerned that 87/40 & 66/11 footpaths are not marked on Map 1 despite this Management Plan covering 2020-24 When PCNPA’s on-going repair is finished they will complete an amazing circular walk & shortcut between Moylegrove & St Dogmaels (Moylegrove to Pantaeson). On 31 03 2016, 13 members of St Dogmaels Footpath Association assisted with about 90 hours labour, opening up 100 metres of this diverted section of path. We have asked what else we can do to assist with completion as it is such an important link. 87/40 & 66/11 must be added to Map 1.</p>	<p>The maps provided as part of the discussion paper only depicted the network of public paths currently maintained and in use. The link provided by public footpaths 87/40 and 66/11 was not included as work is required to make it accessible. The National Park Authority is aware of the demand for this route and has identified it as a priority for improvement. Accordingly work is scheduled to commence in 2019.</p>
DP033	<p>Response G: Re 2.A landscape for life and livelihoods Opportunities & Challenges L2 Increasing people’s appreciation and understanding of the National Park and its special qualities and influencing attitudes and behaviour L6 Contributing to the economic and social resilience of communities LL2 Collaborate to ensure a sufficient supply of business premises for small and medium sized businesses. LL10 Promote the connections between landscape, culture, the historic environment and natural heritage</p>	

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	<p>e.g. through National Park Authority Centres</p> <p>All the examples relate to concrete physical development What is missing in the Example Actions is human interactions and training needed for the National Park to comply with its 'Duty to foster the economic and social well-being of communities living within the Park.</p> <p>An example: If PCNPA staff in Oriel Y Parc could provide information about accommodation anywhere in the PCNPA area. This would tick the economic well-being box.</p>	<p>L6 and LL10, and the associated example actions were intended to accommodate a wide range of forms of development and support. It is considered that they do so, however the consultation draft Management Plan should clarify the range of options where appropriate.</p> <p>Staff at Oriel y Parc are often the first contact for visitors arriving in the county and are delighted to try and help with all requests for information.</p> <p>Accommodation requests tend to be focused on the St Davids area. Other requests for accommodation can be serviced where accommodation providers have requested to be listed and /or where they appear on affiliated booking systems.</p> <p>It is not proposed to take forward a specific recommendation for the consultation draft Management Plan.</p> <p>Note: A copy of correspondence previously sent to Authority staff on this matter, and dealt with separately, was included in the representation.</p>
DP034	Nothing to add.	-

Q2. What additional Actions are needed? Should any be removed?

Ref	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP035	<p>The following are examples of actions that are not 'SMART'. <i>WB15 Collaborate to address user pressures (see map) including those arising from unauthorised camping, vehicles, launching, beach horse-riding, use of bicycles on footpaths, angling, powered watercraft, large events, coasteering, snow activities and drone use.</i> <i>E8 Reducing litter including littering by marine plastics and lost fishing materials.</i></p> <p>A SMART action should be included to address the identified pressure in para 2.2.1 of the Plan to provide and manage opportunities for Sustainable Recreation in the National Park.</p> <p>To facilitate the action, amendments should be made to the recently submitted LDP. This matter was raised in representation 1665 of the LDP, the response to which was that it is a matter for the Management Plan to address, which it hasn't.</p> <p>The user pressure is known, however the paper does not identify how it will be addressed.</p>	<p>The 'Example Actions' quoted were offered as examples for discussion and not as specified projects. The consultation draft Management Plan should identify the desired impacts of policies and initiatives clearly, so that they can be considered in partners' corporate planning.</p> <p>Para 2.2.1 of <i>Enjoying the Pembrokeshire Coast National Park</i> is concerned with capacity and congestion, and states that:</p> <p>"Many smaller coastal locations can get extremely congested at peak times, with visitor traffic including caravans and boat trailers arriving along small roads and launching from a limited number of sites. This is exacerbated where locations are used for several activities, where access is limited to single-track roads and where parking is limited. The recreational hot spot sites around St Davids Peninsula (such as Abereidly Porthgain, St Justinians and Solva) and around the Dale Peninsula (such as Martin's Haven, St Bride's Haven and Dale) can become congested at peak times. The Tenby and Saundersfoot areas have the largest volume of users in the county, which also creates traffic</p>

		<p>congestion between the urban centres and the coast. These well established larger centres have different congestion problems with higher numbers, better road access, parking and traffic management.”</p> <p><i>Enjoying the Pembrokeshire Coast National Park and the Destination Plan for Pembrokeshire</i> (in review) acknowledge the importance of the environment and community capacity and are supported by specific advice e.g. the National Park Authority’s <i>Recreation and Leisure Activities Supplementary Planning Guidance</i> (2012) and Pembrokeshire County Council / National Park Authority guidance for outdoor events (in development).</p> <p>User pressures including congestion are issues which the consultation draft Management Plan will need to engage with. To clarify, the <i>Opportunities and Challenges</i> discussion paper was an early stage in Management Plan preparation, rather than a draft Management Plan.</p> <p>It is worth noting that destination promotion has become heavily influenced by user content on social media in recent years.</p>
DP036	<p>SUGGESTED ADDITIONAL ACTIONS</p> <p>EC11 Collaborate with and utilise the experience of local charities and stakeholders to promote beach clean initiatives, public engagement around the issue of plastic rubbish in the marine environment.</p> <p>EC12 Build on relationships to facilitate stakeholder</p>	<p>These areas of work should be reflected in the consultation draft Management Plan; it is proposed that that this would be done by reference to the relevant marine Management Schemes and Marine Protected Area Network action plans.</p> <p>The Pembrokeshire Marine Special Area of</p>

	<p>working within the Pembrokeshire Marine SAC, engaging with fisheries and recreational boat operators to reduce disturbance and discarded fisheries rubbish.</p>	<p>Conservation (SAC) Relevant Authorities Group agrees annual actions in support of the SAC Management Scheme. These have included a number of litter related projects delivered by the SAC Officer and / or by Relevant Authority Group partners (e.g. awareness work, reducing lost tackle, line recycling, beach cleans, Fishing for Litter).</p> <p>The National Park Authority is a member of the Group. In 2018, the Marine Protected Area Management Steering Group published a costed action plan (Marine Protected Area Network Management Action Plan for Wales 2018–2019) which includes an action to “Deliver the priority actions within the Marine Litter Action Plan where they provide benefit to the network of MPAs in Wales.” The National Park Authority will contribute to this action through the Relevant Authorities group and by working with other partners as appropriate.</p> <p>Recreational disturbance may be managed with stakeholders through agreed codes of conduct (such as the Pembrokeshire Marine Code and Outdoor Charter initiatives, climbing restrictions at Castlemartin and the coastering code of good practice) and awareness-raising (for example the coastering and canoeing videos produced by Pembrokeshire Coastal Forum).</p>
DP037	<p>LL13 Focus on pre-identified ‘user pressure points’ (see Maps) to target effort and resource in areas with the greatest potential for increased sustainability, to maximise visitor experience and contribution to the economic and social resilience of local communities.</p>	<p>The Management Plan should consider potential recreational conflicts and how they may be resolved. Policies and actions presented in the consultation draft Management Plan should derive from National Park purposes and observe the Sandford principle (which states that in the event of an irreconcilable conflict between the purposes, conservation has greater</p>

		weight). In the pursuit of the purposes, the National Park Authority should seek to foster socio-economic well-being of National Park communities. The consultation draft Management Plan should include user management action/s reflecting this approach.
DP038	NRM10 Encourage a joined up and cohesive public transport option across the train, bus, cycle and walking networks. Provide a reliable and realistic alternative with adequate Park and Ride provision for park users.	Welsh Government transport policy aims to encourage active travel and public transport and to reduce the need to travel by private car. Pembrokeshire County Council and National Park Authority collaborate with partners to contribute to these policy goals locally. Action should be included in the consultation draft Management Plan.
DP039	NRM11 Collaborate to ensure active travel routes provide access/connect to known transport hotspots from local centres e.g. St Justinians to St Davids.	The National Park Authority is currently working with stakeholders to improve sustainable access to St Justinians by reducing the number of vehicles using the road and providing more public transport access.
DP040	“ACTIVELY help to raise public awareness...” should be an action in <i>each</i> of topics 4 and 6. And an action to evaluate progress (qualitative/quantitative) should be included. <i>[See also DP005 above.]</i>	Opportunities to influence behavioural change / awareness and, where appropriate, desired policy impacts, should be reflected for the themes of biodiversity and natural resources management in the Management Plan.
DP041	Suggest section 1.7 could usefully distinguish more clearly between the generic statement about supporting EA and WFGA, and its more specific reference to NRW and Area Statements. For example, separate paragraphs to give more emphasis to fact management plan will adapt and evolve to take account of and/or align with them?	Noted.
DP042	In the Restoring Biodiversity section, there should be a	Support for the Authority’s Woodland Team’s work is

	<p>mention of the work that the woodland team undertake in restoring and managing semi-natural woodland. Invaluable work has been achieved restoring favourable management to SSSIs in the North Pembrokeshire Woodlands Special Area of Conservation; and increasing connectivity between the component sites by restoring former conifer areas to semi-natural habitats. Management work should continue here to prevent naturally regenerating conifers from reducing biodiversity in these sites. Continued management will allow nationally important populations of lichens to thrive and will ensure that viable populations of dormice and other rare species can survive. This work meets the opportunities E1 and E2.</p>	<p>noted with thanks. It is not yet clear what level of detail the Management Plan will contain but policy / programmes / impacts should reflect the importance of restoring and managing semi-natural woodland and planted / conifer sites.</p>
DP043	<p>The action EC2 should also include mention of B-lines devised by Buglife, which have already been mapped (and are mostly in the PCNPA) and can be achieved by many of the actions under 'Conserving the Park'. They meet opportunity E2.</p>	<p>Agreed. While the importance of the B-lines network and other connectivity efforts are mentioned in the <i>Nature Conservation</i> background paper to the discussion paper, the consultation draft Management Plan should also make reference.</p>
DP044	<p>Under EC8, there could be a cross-reference to the proposed SPG on lighting, as this will also contribute to conserving biodiversity by preserving and re-creating darker areas and corridors for wildlife.</p>	<p>EC8 refers to delivery of the Authority's <i>Local Development Plan 2</i>. The importance of the proposed Supplementary Planning Guidance on lighting in terms of biodiversity is acknowledged; the consultation draft Management Plan should refer to this where relevant.</p>
DP045	<p>Nothing to add.</p>	<p>-</p>
DP046	<p>WB8 Increase the local frequency of local participation in suitable activities (e.g. walking, cycling, rowing, paddleboarding, canoeing, kayaking, swimming) in locations where capacity exists.</p>	

	<p>WB12 Collaborate in delivery of the West Wales Nature-based Health Service Project including social prescribing (e.g. targeted walking programmes and training) and support for people living with dementia and carers.</p> <p>Our comment is as follows: The discussion paper lists collaboration as one of the mandated ways of working. Collaboration needs to apply at all levels. In an age of constrained resources everything possible must be done to encourage cooperation between the statutory and voluntary sectors. Many of the aspirations stated in the draft Management Plan will only be achieved with the support and efforts of local voluntary organisations. The proposed example actions WB8 and WB12 give no hint about how better collaboration can be achieved. Let's Walk Pembrokeshire is an excellent concept as an umbrella body for walking in Pembrokeshire. However we remain to be convinced that it has significantly increased collaborative working with and between local walking organisations. Local organisations operate autonomously without any particular relevance to the purposes of the National Park. By engaging more closely with local walking organisations, the National Park has the potential to achieve the desired increase in frequency of walking listed in WB8.</p>	<p>Let's Walk Pembrokeshire is a working group of statutory and non-statutory bodies looking to increase walking as an entry-level exercise and for improving and maintaining health and well-being.</p> <p>The National Park Authority is working with Hywel Dda University Health Board, Public Health Wales and GPs' surgeries to engage social prescribing models and community involvement. Examples of this work include the Walkability programme and the Directory of local Walking Groups.</p> <p>The National Park Authority welcomes conversations with any organisations positioned to take forward the agenda. The consultation draft Management Plan should seek to increase collaboration further.</p>
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Q3. Who should be involved in delivering the Actions? (please provide the relevant action reference)

Ref	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP047	A full range of stakeholders, including the RSPB.	Noted.
DP048	Everyone! Authority, stakeholders, residents, visitors.....	Noted.
DP049	All the proposals above should be led by the National Park but can be undertaken in partnership with other organisations such as the County Council and Natural Resources Wales.	Noted.
DP050	Your indicative list of stakeholders for the 2020-24 Management Plan (Report 25/18) includes WWBIC and refers to involving county recorders which is welcomed. We do think we <i>[edit: West Wales Biodiversity Information Centre]</i> can add an additional role here for wider engagement in wildlife recording particularly with the ever increasing use of recording apps, online recording and public access to data (see aderyn.lercwales.org.uk)	Noted. The consultation draft Management Plan should refer to the potential for wider public engagement with surveys and survey results.
DP051	Action EC4: WWBIC has a role in managing and sharing occurrence data on invasives which may be collected from a wide range of individuals.	Noted.
DP052	Action EC6: WWBIC will share biodiversity data with MWWFRS.	Noted. This data sharing enables the Mid and West Wales Fire and Rescue Service to take habitats / species into account when responding to incidents.

APPENDIX 6 – PRECIS OF AUTHORITY MEMBER COMMENTS ON THE SUSTAINABILITY APPRAISAL SCOPING REPORT

National Park Authority meeting 30th January 2019 (see also report 05/19)⁷.

Authority Member Comment	Result
Section 3 baseline - need to identify the Authority as having a role in providing evidence for the baseline.	Incorporated into paragraph 4.2.
Page 201 travel by car phrase to include 'enhance and encourage' alternatives.	Agreed, amended sustainability appraisal objective to: "Minimise the demand for travel, especially by private car, reduce the impacts of road transport, and enhance opportunities and encourage use of alternatives."
Page 14 refer to electric cars/hybrids.	Disagree – the objective concerns reducing the need to travel particularly by private car and reducing the impacts that private car use has. Including a reference to private electric or hybrid vehicles runs contrary to the sustainability appraisal objective.
Accessibility page 198 - re self-catering range of incomes does it suggest a lack of quality which Visit Wales is after	Addressed in the NPA committee meeting. It was explained that it is regarding quality within a range of provision to suit different pockets.
Social mix (inclusivity) - do we know what that is for Pembrokeshire?	To be addressed through the Equality Impact Assessment process.
Public transport consultation issued by Welsh Government.	Noted.
Reference to 'unfavourable condition'. Looks a bit depressing - we need to highlight the NPA's land management role and successes.	Agreed. Paragraph added to the baseline.
Big discussion on second homes. No changes to document.	Noted.
8 week consultation - need flexibility for NRW possibly.	8 weeks was allowed for the consultation.
Page 16, Box 7 – agricultural ammonia emissions. Note that ammonia emissions from poultry manure can be an issue, in particular where individual units are kept below thresholds that	Amended – Ammonia emissions from poultry now mentioned in the baseline.

⁷ Link to National Park Authority papers and minutes:
<https://www.pembrokeshirecoast.wales/default.asp?PID=411&selCom=4>

would trigger EIA or environmental permit in aggregate.	
Page 18, Box 18 (typo) “Holiday homes are also...”	Amended.
Page 20, Box 24 (typo) 2nd sentence has something missing	Amended.
Page 24, Box 9 – suggested rewording of sustainability objective (“...encourage and facilitate...”)	Amended.
Page A2 – Is a note needed on Brexit?	Not at this stage as Brexit has not yet occurred and the development of the Management Plan and the Sustainability Appraisal can only take into account policy that is currently in place.

Management Plan Workshop 20th February 2019

Members received a draft copy of the Report of Consultations on *Opportunities and Challenges: Discussion Paper for the Management Plan 2020-2024* in advance of the workshop. During the workshop, Members discussed the following identified opportunities and challenges: unauthorised camping and visitor management; invasive species; engaging with people.

Management Plan Workshop 3rd April 2019

Members discussed issues and management options relating to cultural heritage and to the marine environment. Next steps in Management Plan preparation were outlined. Members received an early draft Management Plan with a period for informal comment of 3 weeks (24th April 2019).

Management Plan Workshop 15th May 2019

This workshop was cancelled as it was not required.

APPENDIX 8 – PRECIS OF AUTHORITY MEMBER COMMENTS ON THE DRAFT MANAGEMENT PLAN

National Park Authority meeting 5th June 2019 (see also report 23/19)⁸.

Authority Member Comment	Result
Comments regarding Welsh language impact assessment of the draft.	A meeting regarding Welsh Language Impact Assessment took place on 2 nd August 2019. Welsh language impacts contained in the Sustainability Appraisal were duplicated into a new document “ <i>Impacts of policy on the Welsh language. Extracts from the Sustainability Appraisal of the consultation draft Pembrokeshire Coast National Park Management Plan 2020-2024</i> ’ as part of the suite of consultation documents.
Suggestion that policy H2 be separated into language and other cultural elements.	Separation of H2 into H2 and a new policy H3 was trialled, however it was considered that they and the associated impacts were stronger together. For example, duplication of H2 b in H3 would have been necessary in order not to exclude wider story telling not related to Welsh Language (e.g. the 80 th anniversary project collecting stories from people who have lived on Castlemartin Range, or people reflecting on own heritage and relationship with landscape). No change to draft Management Plan.
Comment regarding impacts of toilet closures.	Noted. This subject has arisen through the Equality Impact Assessment process. No change to draft Management Plan.
Pleased to see place-names included.	Noted. No change to draft Management Plan.
Comment on the importance of continued budgets for water quality monitoring as water quality fundamental to economy.	Noted. No change to draft Management Plan.
Comment that reference to the marine environment should appear in the list of opportunities and challenges.	The first point at para 1.13 has been amended to: “enabling ecosystem recovery at scale and improving the state

⁸ Link to National Park Authority papers and minutes:
<https://www.pembrokeshirecoast.wales/default.asp?PID=411&selCom=4>

	of wildlife on land and in the marine environment”
Amend glossary definition of affordable housing (alternative for “unsuitable”)	The definition of affordable housing has been amended to: “Housing for sale or rent at prices below the market rate, provided for local people in inappropriate housing who cannot afford to resolve their housing needs in the open market.”
Noted the importance of tourism revenue to the region and a potentially greater role for the NPA in future.	Noted. The importance of the visitor economy is featured in the consultation draft Management Plan. No change to draft Management Plan.
The Foreword should better reflect the changed legislative and policy context. This includes building on previous work, the new legislative framework (Well-being of Future Generations (Wales) Act 2015, Environment (Wales) Act 2016, Historic Environment (Wales) Act 2016, Planning (Wales) Act 2015, Welsh Government’s <i>Natural Resources Policy</i> (2017), <i>Valued and Resilient: The Welsh Government’s Priorities for the Areas of Outstanding Natural Beauty and National Parks</i> (2018). These also include different approaches, such as the new ways of working, Area Statements etc.	The foreword has been redrafted with the suggested additions referenced. Additional references to new legislation have been added at para 1.6.
Policy L3b (page 14): what are defence sites? If these mean MoD owned sites this needs to be specified or have this explanation/definition in the glossary of terms.	L3b amended to read “Manage proposals for intensification of use or extension of Ministry of Defence sites in accordance with Pembrokeshire Coast National Park Authority’s <i>Local Development Plan 2</i> policy.”
Policy W1e (page 15): getting an Excellent for Wiseman's Bridge is an achievement, but in terms of the Management Plan shouldn't we be aiming to ensure that <u>all</u> excellent rated beaches retain this standard? (not just highlighting Wiseman's Bridge).	W1e amended to read “Improve water quality at designated bathing waters achieving less than “Excellent” status.”
Policy W1k (page 16): do we need to be more specific? - we need to manage slipways, berths, mooring and shore facilities anyway, are we aiming to do them to a particular standard (I would hope so!) and all of them under our control? Or ensure others do? Provide appropriate facilities?	The original policy wording conflated a number of assets which individually may require different management approaches. In order to convey the principle of continued facilitated access to water and to provide a context for a full range of

	<p>projects over the Plan period, W1k has been amended to read: “Collaborate to enable public access to water where appropriate for quiet enjoyment.”</p>
<p>Policy N1a (page 22): how are we going to contribute specifically? [it is this one in retrospect perhaps I should have raised for general discussion, although I assume it is an area that has been discussed at length previously] We are expected to be an exemplar - should we be setting/stating some targets for the Authority here? Not just 'pursuit of WG ambition'?</p>	<p>N1a refers to Welsh Government’s low-carbon Wales proposals and is somewhat of a signpost to more specific areas of policy / impact.</p> <p>N1a has been amended to read: “Collaborate in delivery of actions in <i>Prosperity for All: a Low Carbon Wales</i> including a carbon neutral public sector by 2030, implementing renewable energy and energy efficiency measures (see N1b), reducing transport emissions (see N1d) and safeguarding and increasing carbon storage (see N3b) including agricultural soils.”</p> <p>Authority-specific actions and performance metrics will be included in the Authority’s Corporate and Resources plans over the Management Plan period.</p>
<p>Policy N2b (page 22): repeats Policy W1e (page 15).</p>	<p>The duplicate wording has been deleted from N2.</p>
<p>Policy N3 (page 23): should we also include as an extra point here the catch-all phrase used in other Policy areas about following/using the PCNPA LDP2?</p>	<p>A new impact has been added: “Manage development in accordance with Pembrokeshire Coast National Park Authority’s <i>Local Development Plan 2</i> policies and guidance in relation to soil, water, air and earth heritage.”</p>
<p>Policy N4b (page 23): do we need to add something as well as monitoring? What is the purpose of monitoring these trends? Will we take action if the monitoring shows increasing trends?</p>	<p>N4b amended to: “Monitor and manage as necessary pollutants such as oxides of nitrogen, carbon monoxide and particulates.”</p>

Cynllun ar gyfer y Parc a'i bobl



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Mae **Awdurdod Parc Cenedlaethol Arfordir Penfro**

wrthi'n paratoi fersiwn newydd o Gynllun Rheoli'r Parc Cenedlaethol am y cyfnod 2020-2024.

Bydd y Cynllun yn nodi'r hyn y gall bob yr un ohonom ei wneud i ofalu am y Parc Cenedlaethol, mwynhau a dysgu am y Parc, gan gynnal bywoliaeth y bobl yn y broses.

Ymgynghorir â'r cyhoedd ynglŷn â'r Cynllun drafft yn ystod y cyfnod o'r 1 Awst - 31 Hydref 2019.



Cofiwch ymweld â gwefan yr Awdurdod ar www.arfordirpenfro.cymru/dweudeichdweud neu ffoniwch 01646 624800 i ddarganfod mwy.

A Plan for the Park and its people



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

A new National Park Management Plan for 2020-2024 is being prepared by the **Pembrokeshire Coast National Park Authority**.

The Plan will set out what we can all do to look after, enjoy and learn about the National Park, supporting people's livelihoods in the process.

Public consultation on the draft Plan runs from 1 August - 31 October 2019.

Please visit the Authority's website www.pembrokeshirecoast.wales/haveyoursay or phone 01646 624800 to find out more.

APPENDIX 10 – CONSULTATION QUESTIONNAIRE

(An Easy Read version of the questionnaire was also available in Welsh and in English.)

<h1 style="margin: 0;">National Park Management Plan 2020-2024 Consultation</h1>	Ref: OFFICE USE ONLY
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About you (please refer to the data protection information above)

Name	
Organisation (if applicable)	
Address	
Email	

Comments

Please provide paragraph reference(s) and/or specify locations in the National Park where relevant.

<p>1. Are the themes for partnership action in the draft Management Plan appropriate for achieving National Park purposes? Yes / No / Don't know If not please explain why.</p>
<p>2. Do the policies in the draft Management Plan address all the relevant opportunities and challenges? Yes / No / Don't know If not why not?</p>
<p>3(a) Are the impacts listed under each policy in the draft Management Plan appropriate for the Plan period (2020-2024)? Yes / No / Don't know If not, why not?</p>
<p>3(b) Could you or your organisation help deliver and /or provide monitoring data for the impacts? Please specify.</p>
<p>4(a) Do you agree with the Sustainability Appraisal of the draft Management Plan? Yes / No / Don't know If not please explain why.</p>
<p>4(b) Do agree with the Sustainability Appraisal's assessment of the impacts of the draft Management Plan on the Welsh language? Yes / No / Don't know If not please explain why.</p>
<p>5(a) Do you agree with the Equality Impact Assessment of the draft Management</p>

Plan? Yes / No / Don't know
If not please explain why.

5(b) Can you provide detail in relation to specific questions asked in the Equality Impact Assessment? *(Please see the "Actions and Implementation" tables at the end of the Equality Impact Assessment for a summary of these.)*

6. Do you agree with the Habitat Regulations Assessment of the draft Management Plan? Yes / No / Don't know
If not please explain why.

7. Are there any comments you would like to make on the consultation documents?

I **do not** wish my name to be published with my response

Please post or email your comments to:

Head of Park Direction
Pembrokeshire Coast National Park Authority
Llanion Park
Pembroke Dock
Pembrokeshire
SA72 6DY

Email: devplans@pembrokeshirecoast.org.uk

Closing date for comments: 5pm Thursday 31st October 2019

Thank you for completing this questionnaire.

APPENDIX 11 – CONSULTATION CONTACTS

- Age Cymru
- Amgueddfa Cymru – National Museum Wales
- The Amphibian and Reptile Conservation Trust
- Ateb
- Bluestone Foundation
- British Trust for Ornithology
- Buglife
- Bumblebee Conservation Trust
- Cadw
- City, Town and Community Councils in Pembrokeshire
- Clynfyw Care Farm
- Campaign for National Parks
- Creating an Active Wales Network
- The Darwin Centre
- Dyfed Archaeological Trust
- Dŵr Cymru / Welsh Water
- Destination Pembrokeshire Partnership
- Disability Wales
- Dyfed-Powys Police
- Ethnic Minorities and Youth Support Team Wales
- Equality and Human Rights Commission
- European Marine Sites
- Family Holiday Association
- Farmers Union of Wales
- Federation of Small Businesses Wales
- Friends of the Pembrokeshire Coast National Park
- Freshwater Habitats Trust
- Gypsy Council
- Keep Wales Tidy
- Mid and West Wales Fire and Rescue Service
- Maritime and Coastguard Agency
- Menter Iaith Sir Benfro
- Merched y Wawr
- Mind Pembrokeshire
- Ministry of Defence
- National Association for Areas of Outstanding Natural Beauty
- National park authorities
- Newport Area Environment Group
- National Farmers Union Cymru
- National Health Service Wales
- National Park volunteers
- Natural Resources Wales
- National Trust
- Office of the Future Generations Commissioner
- One Voice Wales Un Llais Cymru
- Pembrokeshire Association of Community Transport Organisations
- Pembrokeshire Association of Voluntary Services
- Pembrokeshire Coast Charitable Trust

- Pembrokeshire Coast National Park Authority Members
- Pembrokeshire Coast National Park Authority Staff
- Pembrokeshire Coast National Park volunteers
- Pembrokeshire Coastal Forum
- Pembrokeshire County Council
- Pembrokeshire Tourism
- Pembrokeshire College
- Pembrokeshire Co-Production network
- Pembrokeshire Nature Partnership
- Pembrokeshire People First
- Pembrokeshire Voices for Equality
- Pembrokeshire Young Farmers Club
- PLANED
- Plantlife Cymru
- Port of Milford Haven
- Pembrokeshire Sustainable Agriculture Network
- Public Health Wales
- Recreation action plan group (Pembrokeshire)
- Respondents to the *Opportunities and Challenges* consultation paper
- Royal Society for the Protection of Birds
- Saundersfoot Harbour
- School governing bodies
- Steps2health Walking Club
- The Environmental Network for Pembrokeshire
- Transition Bro Gwaun
- Visit Wales
- Wales Council for Voluntary Action
- Welsh Language Commissioner Comisiynydd y Gymraeg
- West Wales Action for Mental Health
- West Wales Care Partnership
- Welsh Government
- Wildlife Trusts Wales
- Women's Institute Pembrokeshire
- West Wales Biodiversity Information Centre

APPENDIX 12 – REPRESENTATIONS ON THE CONSULTATION DRAFT MANAGEMENT PLAN

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
MP001	Uzmaston, Boulston and Slebech Community Council	<p>1. Do you think we have said enough about: How we can make the park better?</p> <p>No A big part of the local public’s interaction with the NP is through planning applications. It might be worth being clearer about planning policy as many people find the officers’ interpretation subjective rather than following an easily accessed set of guidelines. Many local people are also anxious about second home purchases disrupting the housing economy and communities. The NP has a policy - again it might be worth reinforcing your stance.</p>	<p>The role of the Management Plan is to provide a strategic context for the Local Development Plan and the current approach is considered to be sufficient and appropriate. The detail of the Local Development Plan is assessed rigorously through engagement and finally through Examination. These issues in particular have been raised and discussed extensively through Examination. Planning application assessments rely primarily on the detail of the Local Development Plan which has to be consistent with the</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>Management Plan. Consistency with the Management Plan is one of the tests of soundness. A Planning Officer's professional advice will be in accordance with policy and supporting guidance but will also need to consider other material planning considerations.</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP002	Uzmaston, Boulston and Slebech Community Council	<p>Please be clearer about how the NP can influence water quality – is it directly or through the Environment Agency?</p> <p>The rivers are dying around Wales mainly due to nitrate pollution from recent changes in farming practice to create high intensity milk production. Some farmers are using big contractor led operations to spread vast quantities of slurry which ultimately pollutes the water courses resulting in a toxic</p>	<p>The EU Nitrates Directive (91/676/EC) is currently implemented via The Water Resources (Control of Pollution) (Silage, Slurry and Agriculture Fuel Oil) (Wales) Regulations 2010 and The Nitrate Pollution Prevention (Wales) Regulations 2013 (as amended).</p> <p>Natural Resources Wales enforces the regulations, including the Action Programme.</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>environment for river fauna.</p> <p>Please be clear about the NP's policy on tackling this problem.</p>	<p>New regulations for the whole of Wales are scheduled for January 2020 and include provisions for:</p> <ul style="list-style-type: none"> • Nutrient management planning • Sustainable fertiliser applications linked to the requirement of the crop • Protection of water from pollution related to when, where and how fertilisers are spread and • Manure storage standards. <p>Amend relevant policies / impacts to read: <i>N2(a) Support monitoring and status improvement of those water bodies in the National Park classed as poor or moderate through Natural Resources Wales' River Basin Management Plan programme of measures*, the regulations scheduled for 1st January 2020, and through complementary initiatives e.g. nutrient trading.</i></p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p><i>[move to footnote] *The programme of measures includes volume reduction and best practice management of slurry, silage, fuel oil, and agricultural chemicals; clean and dirty water separation; nutrient management planning; buffer strips and riparian fencing; cover crops and soil management in targeted catchments.</i></p> <p><i>N4(a) Support Natural Resources Wales and the agricultural sector to reduce or intercept reactive nitrogen emissions with an initial focus on potentially-affected nature conservation sites.</i></p>	None (clarification).
MP003	Uzmaston, Boulston and Slebech Community Council	Please provide information on how the NP is going to promote a better litter avoidance culture.	Waste disposal is a function of the local authority rather than the National Park Authority. In terms of where the authority has a planning role planning policy in the Local Development Plan provides for local waste management facilities and composting in accordance with regional	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>and local strategies.</p> <p>The Authority also, for example:</p> <ul style="list-style-type: none"> • Uses interpretation (e.g. by commissioning artwork) to increase awareness of impact of marine litter on wildlife and coastline. • Contributes to the relevant authority groups for Pembrokeshire Marine Special Area of Conservation, Cardigan Bay Special Area of Conservation and Carmarthen Bay and Estuaries European Marine Sites, which have included litter awareness and reduction initiatives. • Organises litter picks with schools and other groups. • Has liaised with Dyfed-Powys Police to appeal to members of the public to stop camping in dunes, following a spate of incidents involving camp fires and littering. 	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<ul style="list-style-type: none"> • Is installing a number of water refill stations to reduce single use plastic bottles. • Responds to consultations (e.g. in 2019 the Authority responded on consultations on deposit return scheme, packaging producer responsibility and plastic packaging tax proposals). <p>Amend L1 by adding a new point L1 (g.): <i>Manage littering and raise awareness of its impacts.</i></p>	None.
MP004	Uzmaston, Boulston and Slebech Community Council	Please identify areas in the NP which are being “re-wilded” to encourage wildlife diversity.	<p>Re-wilding implies large scale ecological restoration with apex predators / keystone species. There are no areas which fulfill this description in the National Park.</p> <p>The State of the Park report includes an ecological characterization of areas of the National Park and the interactive maps feature amalgamated Natural Resources</p>	None.

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>Wales focal connectivity networks (i.e. for bog, fen, grass, heath and woodland). Areas which serve more than a single network appear darker. These will complement the Nature Recovery Action Plan for Pembrokeshire in providing a context for local action for biodiversity.</p> <p>No change to Management Plan is recommended.</p>	
MP005	Uzmaston, Boulston and Slebech Community Council	<p>3) Do you think we can achieve our goals in the next four years?</p> <p>Yes</p>	Noted.	None.
MP006	Uzmaston, Boulston and Slebech Community Council	<p>4) Can you or your organisation give us information to help us find out if we are achieving our goals?</p> <p>Yes Observing wildlife activity through participation in activities such as</p>	Noted with thanks. To follow up during implementation.	None.

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>butterfly and bumble bee counts as well as monitoring interesting and rare species</p> <p>Checking water quality through initiatives such as that promoted by SWEPT</p> <p>Monitoring and ultimately helping to clean the watercourses of man-made litter</p>		
MP007	Office of the Future Generations Commissioner	<p>Thank you for sending us your consultation on the draft Pembrokeshire Coast National Park Management Plan 2020-2024.</p> <p>I receive a large number of requests and consultations and, given the capacity of my office, I am only able to provide full responses to consultations directly related to my areas of focus (transport, housing, skills for the future, planning, better ways of keeping people well, adverse childhood experiences,</p>	<p>The Frameworks documents are noted with thanks (Framework for Service Design, Framework for Projects, Framework for Scrutiny).</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>decarbonisation, procurement and budget).</p> <p>Having said that, to support your work, I attach some of my Future Generations Frameworks. I expect public bodies, such as yourself, to fully implement the Act and its elements and carry out their duties. To this effect, my frameworks set prompts to guide public bodies in formulating policies and taking decisions, but also to scrutinise such decisions or policies.</p> <p>As you will see the prompts set out in the frameworks will be relevant to your consultation exercise (its substance and the way you use the five ways of working) and should, therefore, guide your work.</p> <p>It is important that your own well-being</p>	<p>The Themes for Partnership Action outlined in the draft Management Plan reflect National Park purposes and align with the Well-being of Future Generations (Wales) Act 2015 (amongst other legislation and policy – see para 1.6 of the draft Management Plan).</p> <p>Para 1.17 of Annex A of the draft Management Plan sets out the ways in which the management planning process, and the management plan itself as a plan that gives rise to projects, will fulfill the five ways of working.</p> <p>Plan review has taken place in line with an</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>objectives, the well-being plan and objectives of the local Public Services Board, the national well-being goals and the sustainable development principle (including the 5 ways of working) are considered throughout the process. I hope that you will find these frameworks useful.</p> <p>I would also suggest you have a look at the Journeys I have published on my website as part of my partnership programme Art of the Possible. These shine a light on good practice and contain steps towards sustainability that I would like public bodies to take. So far, I have published three Journeys (A Journey to Resilient Wales; A Journey to Globally Responsible; and A Journey to A Wales of Vibrant Culture and Thriving Welsh Language), which might contain steps that relate to this</p>	<p>engagement strategy approved by the National Park Authority on 20th June 2018. Comment on the strategy itself was invited from public, private and third sector organisations during drafting.</p> <p>Noted. Other Journeys have now been published (A Prosperous Wales, A More Equal Wales, A Healthier Wales, A Wales of Cohesive Communities, A Journey to</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>consultation.</p> <p>As I would like to create documents that are of great use for people and public bodies, I will continue developing my frameworks and Journeys in the future. Therefore, I would be grateful if you could provide us with any feedback on your experience of using them as part of your work.</p>	<p>Involvement. These define the issues and set out the steps to sustainability within each theme. Examples of simple and more ambitious changes are included and many of these are relevant to and included within the Management Plan.</p> <p>It is envisaged that the Journeys will provide a valuable resource during implementation.</p>	None.
MP008	Dyfed Archaeological Trust	<p>Are the themes for partnership action in the draft Management Plan appropriate for achieving National Park purposes?</p> <p>Yes</p>	Noted.	None.
MP009	Dyfed Archaeological Trust	<p>2. Do the policies in the draft Management Plan address all the relevant opportunities and challenges?</p> <p>Yes</p>	Noted.	None.

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
MP010	Dyfed Archaeological Trust	<p>3(a) Are the impacts listed under each policy in the draft Management Plan appropriate for the Plan period (2020-2024)?</p> <p>Yes</p>	Noted.	None.
MP011	Dyfed Archaeological Trust	<p>3(b) Could you or your organisation help deliver and /or provide monitoring data for the impacts? Please specify.</p> <p>We could help deliver and provide data and advice for several of the impacts listed under Policy H1.</p> <p>Opportunities may also exist within other policies such as policy W1 (h), W2 (a & b), E1 (k) and H2 (a & d).</p>	Noted with thanks. Heritage could be an area of focus for management plan implementation via the action plan.	None.
MP012	Dyfed Archaeological Trust	<p>4(a) Do you agree with the Sustainability Appraisal of the draft Management Plan?</p>		

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>No</p> <p>If not please explain why. Generally the answer is yes. In the sustainability objective 1.2. i refers to viable agriculture and forestry, but the Policy E1 concentrates on conserving and restoring semi natural woodland with no mention of coniferous forestry plantations. Coniferous forestry is a significant landscape feature of parts of the Preseli Mountains and we would like to see a policy on replacing this with native woodland or restoring it to open moorland.</p>	<p>Agree. Amend E1 (b) to: <i>E1 (b) Conserve and restore semi-natural woodland, wood pasture, trees in the landscape and field boundaries, taking into account species' connectivity needs, landscape and the impacts of plant pathogens e.g. Chalara ash dieback, and pursue opportunities to reduce the impacts of non-native coniferous woodland on biodiversity and landscape.</i></p> <p>Also add revised this wording to L1 (c.) and N3 (c.)</p>	<p>None (clarification).</p>
MP013	Dyfed Archaeological Trust	<p>7. Are there any comments you would like to make on the consultation documents? Under the heading 'What will Success</p>	<p>Consultation question 3 (a) sought to elicit</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>look like?' We are not sure of the meaning of 'it sets out a range of desired policy impacts which will be used to evaluate the direction and rate of travel over the Plan period.' We accept that some outcomes are difficult if not impossible to measure, but some are not. There needs to be a statement in the document where there are clear measurable outcomes/outputs. For instance Policy L1c reducing visibility of existing infrastructure in the examples provided is clearly measurable. There are others where measurement would be appropriate.</p>	<p>views on how impacts could be better defined. This is a task that will need to continue during Plan implementation and we would welcome more discussion with Dyfed Archaeological Trust on this (links to representation MP011 above).</p> <p>The Plan is evidence-based (key evidence sources used in the State of the Park Report are summarised at Annex C) and the quoted para 1.15 of the draft Management Plan is not intended to suggest that there will be no outcome monitoring, rather that there should be no upper bound for improvement for the state of the natural and historic resources of the National Park as might be implied by an outcome target.</p> <p>The impacts (outputs) listed are the proposed means to achieve the policies over the Plan period. These are for</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>individual organisations and for partnerships and would be measured through corporate planning processes and through management planning reporting.</p> <p>The National Park Authority will prepare an action plan which highlights annual campaigns or themes, for example by focusing on heritage, conservation, or responses to climate change, and which specifies impacts in more detail.</p> <p>Amend the end of para 1.15 of the draft Management Plan (main text) by adding “Progress will be assessed through annual reports and State of the Park reporting.”</p>	None (clarification).
MP014	Pembrokeshire County Council	<p>1. Are the themes for partnership action in the draft Management Plan appropriate for achieving National Park purposes?</p> <p>We agree that the themes identified are</p>		

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		appropriate.	Noted.	None.
MP015	Pembrokeshire County Council	<p>2. Do the policies in the draft Management Plan address all relevant opportunities and challenges?</p> <p>We agree that the policies are appropriate and note PCNPA's commitment to work with Pembrokeshire County Council (and other stakeholders) on a range of initiatives to support these. We have suggested some minor refinements at the end of this submission. You may also be interest to note that in our draft response to Welsh Government's consultation on its National Development Framework we have questioned the proximity and therefore intervisibility between the Priority Areas for Renewable Energy in Pembrokeshire and the National Park</p>	Support welcomed. Pembrokeshire County Council's response to the Welsh Government's consultation on the National Development Framework is noted with thanks.	None.

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		boundary.		
MP016	Pembrokeshire County Council	<p>3. (a) Are the impacts listed under each policy in the draft Management Plan appropriate for the Plan period (2020-2024)?</p> <p>We agree that the actions are appropriate for this time period. Some of the actions may well go beyond the end of the Plan period as they are necessarily longer term actions.</p>	Noted.	None.
MP017	Pembrokeshire County Council	<p>3. (b) Are the impacts listed under each policy in the draft Management Plan appropriate for the Plan period (2020-2024)?</p> <p>We will be involved in many of the impacts listed in the Plan. Examples include the coast path and rights of way, promoting Pembrokeshire as a tourism destination and managing recreation, ecology and protecting</p>		

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>habitats, the historic built environment and lighting / dark skies, promoting Welsh and monitoring / reducing pollution.</p> <p>Over the plan period, some of the ways in which we deliver our contribution to the Management Plan may develop (for instance, tourism partnerships) and we welcome the opportunity in the draft Management Plan for continued dialogue.</p>	Noted with thanks.	None.
MP018	Pembrokeshire County Council	<p>Are there any comments you would like to make on the consultation documents?</p> <p>Yes – see comments on matters of detail listed below.</p> <p>Page 13, Policy L2 – Protect and enhance dark night skies – item a) add ... in partnership with Pembrokeshire</p>	Agree. Amend L2 a) to:	

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		County Council. The shape of the NP is such that a whole County approach will be needed if this is to be effective.	<i>L2 a) Produce and promote supplementary planning guidance for Pembrokeshire on lighting for developments requiring lighting schemes (Pembrokeshire County Council and Pembrokeshire Coast National Park Authority).</i>	None.
MP019	Pembrokeshire County Council	Page 15, Policy W1 – Provide and promote sustainable outdoor recreation opportunities for all – item a) add ... in partnership with Pembrokeshire County Council. Part of the Coast Path is located outside the National Park and hence a collaborative approach is needed to ensure the integrity of the linear route.	Agree. Amend W1 (a) to: <i>W1 (a) Manage the Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, to provide a diversity of experiences, and promote it to new audiences (Pembrokeshire Coast National Park Authority and Pembrokeshire County Council).</i>	None (clarification).
MP020	Pembrokeshire County Council	Page 18, Policy E1 – Protect and improve biodiversity quality, extent and connectivity at scale – item d) add references to the emerging NDF and Welsh National Marine Plans.	The Annexes to the draft Management Plan provide more background to the National Park and the Management Plan. They contain information including relevant legislation, policy and guidance and how it is being taken into account; more on the special qualities; lessons learned from the	

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			<p>previous Plan and how the key opportunities and challenges have been identified. Annex B lists some of the context (e.g. national priorities, other plans or programmes) taken into account in drafting the Management Plan. These and many other documents are relevant. The importance of the emerging National Development Framework and Welsh National Marine Plan are acknowledged, however it is considered that to add these references would potentially detract from policy clarity. The named documents will be taken account of in decision making.</p> <p>No change to the Management Plan is recommended.</p>	None.
MP021	Pembrokeshire County Council	Also, on page 19 for the same policy – item q) – insert the word adverse after word 7, to match up with the reference to a significant adverse effect later in	Agree. Amend E1 (q) to: <i>E1 (q) Resist proposals which have a likely significant adverse effect (either alone or in combination with other plans and projects)</i>	

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		the same sentence.	<i>upon a European site unless it can be ascertained following an appropriate assessment that they will have no significant adverse effect on the integrity of the site(s) concerned.</i>	None (clarification).
MP022	Pembrokeshire County Council	Page 20, Policy H1 – Conserve and enhance landscapes of particular historic interest, scheduled monuments, listed buildings and their settings. In the policy title and under point b) insert the word ‘ancient’ between ‘scheduled’ and ‘monument’.	Disagree. The current convention is to refer to “scheduled monuments”. No change to the Management Plan is recommended.	None.
MP023	Pembrokeshire County Council	[H1] Consider adding ‘Conservation Areas’ into the policy title.	Agree. Amend H1 policy to: <i>H1 Conserve and enhance landscapes of particular historic interest, Conservation Areas, scheduled monuments, listed buildings and their settings.</i>	None.
MP024	Pembrokeshire County Council	[H1] Under point b) add the word ‘archaeological’ between ‘local’ and ‘significance’.	Agree, although it is suggested that ‘heritage’ is a preferable term here. Amend H1 (b) to: <i>H1 (b) Monitor the condition of scheduled monuments and sites of local heritage</i>	

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			<i>significance.</i>	None.
MP025	Pembrokeshire County Council	[H1] Under point i) add 'and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken'.	<p>Agree. Amend H1 (i) to: <i>H1 (i) Monitor heritage crime and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken.</i></p> <p>Additional officer comment: for consistency, amend E1 (r) to: <i>E1 (r) Monitor wildlife crime and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken.</i></p>	None.
MP026	Pembrokeshire County Council	Page 22, Policy N1 – Contribute to a low carbon economy for Wales and adapt to climate change – item b) add ...'and awareness of circular economy principles'.	<p>Agree. Amend N1 (b) to: <i>N1 (b) Manage development in accordance with Pembrokeshire Coast National Park Authority's Local Development Plan 2 policies and guidance in relation to soil, water, air and earth heritage, support for appropriate renewable energy development and energy efficiency measures, flooding and coastal inundation, development in coastal change</i></p>	None.

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			<i>management areas, relocation of development affected by coastal change, sustainable design and drainage and waste, supported by supplementary planning guidance where needed, promoting waste efficiency through the waste hierarchy and by raising awareness of circular economy principles.</i>	None (clarification).
MP027	Pembrokeshire County Council	Page 23, Policy N3 – Conserve and enhance soils and natural carbon storage – item b) add ... ‘and protect the best and most versatile agricultural land (that in ALC grades 1, 2 and 3A)’.	<p>Agree. This clarifies national planning policy as set out in Planning Policy Wales 10 (December 2018).</p> <p>Amend N3 (b) to: <i>N3 (b) Support soil conservation, management of peat soils, wetland protection, conservation and expansion of semi-natural habitats, trees in the landscape, reduction of artificial inputs and protect the best and most versatile agricultural land from development*.</i> * [New footnote] <i>Land of grades 1, 2 and 3a of the Agricultural Land Classification</i></p>	

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			<i>system (Planning Policy Wales provides detailed policy prescriptions to be applied).</i>	None.
MP028	Natural Resources Wales	Natural Resources Wales (NRW) welcomes this comprehensive new Management Plan, including its supporting documents, and the important links it makes to, for example, the Natural Resources Plan, the Pembrokeshire Wellbeing Plan and to the principles of Sustainable Management of Natural Resources.	Noted with thanks.	None.
MP029	Natural Resources Wales	<u>Natural Beauty</u> The Natural Beauty of the Park is the basis for its designation and attraction providing so many benefits to society. We would therefore welcome greater emphasis on and ambition for the maintenance and enhancement of natural beauty using all available evidence eg LANDMAP visual and sensory layer has been updated after a 10 year interval and could provide	Noted. It will be useful to explore the updated LANDMAP data with NRW during the Plan period. We envisage that this analysis will also feature in the South West and Marine Area Statements. The State of the Park report includes a number of relevant sections on natural beauty, in particular pages 8-17 of the State of the Park Report (which map and	

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		some insights in enhancing natural beauty. This might helpfully be included in your State of the Park report alongside relevant direction from the Landscape Character Assessment carried out for the Authority.	summarise Landscape Character Assessment characteristics and sensitivities), and pages 59-70 which characterise areas of the National Park in terms of biodiversity. This work is intended to add actionable local management value to the LANDMAP framework. No change to the draft Management Plan is recommended.	None.
MP030	Natural Resources Wales	<u>Area Statements</u> NRW is consolidating stakeholder input into Area Statements which will be published online in March 2020. The Area Statement will provide useful data and evidence on the challenges, risks and opportunities of natural resource management in an Area. Although the timing is unfortunate for this Plan, it is hoped that the Statement may be useful for action planning, future prioritisation and on-going reviews or	Noted and welcomed. National Park Authority staff have also benefited from Management Plan / South West and Marine Area Statement meetings prior to the Management Plan consultation (30 th May 2019) and during the consultation (South West Area Statement event in Pembroke Dock, 3rd October 2019) and follow up correspondence / calls with a member of Natural Resources	

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		context.	Wales' Planning, Landscape, Energy and Decarbonisation Team.	None.
MP031	Natural Resources Wales	<p><u>SMNR</u> There could be added value to the Plan to show how the principles of SMNR have been considered eg</p> <p>Adaptive Management. The Plan introduces 'desired policy impacts' 1.15 page 7 to evaluate the direction of travel. Are these impacts clearly stated? Would their evaluation be sufficient to inform adaptive management?</p> <p>Scale. Working beyond boundaries with neighbouring Authorities, Groups and initiatives for wider resilience. Perhaps consideration could be given to seeking a buffer area for the coastal strip as intensive agriculture could</p>	<p>Describing / specifying and monitoring the impacts will be essential to assessing effectiveness of the Management Plan in generating additional partnership impact. The impacts are also offered as a basis for partners to set corporate plan targets and metrics.</p> <p>The NPA, Pembrokeshire County Council and a range of other partners work through the Pembrokeshire Nature Partnership to address biodiversity challenges. The need to work beyond geographical boundaries when appropriate is embraced by the NPA,</p>	

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		<p>intensify in coming years.</p> <p>Collaboration. Wales' Designated Landscapes are good at collaboration but faced with Climate and environment emergencies there is scope to do more. The Parks might want to consider a collaboration for biodiversity action along the lines of the National Association of AONB's Colchester Declaration.</p>	<p>however intensive agricultural practices often exist right up to the coastal slope and the cost of implementing conservation land management on highly productive agricultural land is often prohibitive if even an option. Welsh Government's Sustainable Farming Scheme will be critical to achieving biodiversity gain on such land.</p> <p>The Colchester Declaration can be found on the National Association of Areas of Outstanding Natural Beauty's website⁹. The three national park authorities in Wales have previously (2013) collaborated on a climate change position statement and most recently PCNPA Members received a report on the contribution of the Authority to meeting the challenges of the</p>	

⁹ https://landscapesforlife.org.uk/application/files/7815/6326/2583/The_Colchester_Declaration.pdf

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			<p>climate emergency (report no 40/19, 13th October 2019). The report outlines how the Authority across its functions is currently responding to climate change, via carbon reduction and sequestration, adaptation and mitigation. It also sets out recommendations on where potentially the Authority can make further reductions or impact, taking in to account the actions in strategic programmes such as <i>Prosperity for All: a Low Carbon Wales</i>.</p> <p>The NPA will continue to liaise and collaborate with the other protected landscapes in Wales. While the impacts to reduce greenhouse gas emissions listed in the draft Management Plan (e.g. policy N1 Contribute to a low carbon economy for Wales and adapt to climate change) are primarily local measures, there is considerable scope under policy E1 (Protect and improve biodiversity quality,</p>	

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		<p>Engagement. Can new technology / social media assist in boosting engagement in Plan development such as in Eryri?</p> <p>Evidence. A new report could be helpful: LANDMAP, landscape and climate change</p>	<p>extent and connectivity at scale).</p> <p>The Authority engagement action plan group (staff) arose partly due to the recognition of the need for engagement on National Park management to become more of an ongoing conversation, between plan reviews, and with continuous learning. One of the long term themes in the action plan identified is online Engagement and Interpretation:</p> <ul style="list-style-type: none"> • Effective online engagement mechanisms are in use that enable people to find out more, interact and feedback about the Authority and Park • Our approach is reflective of how diverse audiences engage with different online platforms <p>Noted with thanks. It will be useful to explore these materials with Natural Resources Wales during implementation,</p>	

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		<p>https://cdn.naturalresources.wales/media/688626/eng-landmap-landscape-and-a-changing-climate.pdf?mode=pad&rnd=131989289330000000</p> <p>Also there are two existing Tranquility Maps again with a 10 year interval. Analysis of these may provide some useful evidence to support Dark Skies interventions.</p>	<p>for example in the context of the opportunities / challenges mapping.</p> <p>No change to Management Plan is recommended.</p>	None.
MP032	Natural Resources Wales	<p>The recent Brexit scenarios work to map likely implications on land management led by [redacted] showed potentially huge impacts for Wales. Given this it is surprising not to see Brexit on the list of key Opportunities and Challenges for the National Park or at least consideration of likely impacts on the Special Qualities of the Park.</p>	<p>Noted. Brexit has been considered (e.g. Section 14 of the State of the Park Report) including the Brexit mapping work referred to.</p> <p>Britain's exit from the European Union brings opportunities and challenges which are reflected in the list included in the draft Management Plan. That is, Brexit was 'unpacked' into specific aspects relevant to National Park purposes, for example</p> <ul style="list-style-type: none"> enabling ecosystem recovery at scale 	

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			<p>and improving the state of wildlife on land and in the marine environment</p> <ul style="list-style-type: none"> • conserving and improving soil health and enhancing natural carbon stores • addressing the impacts of invasive species and plant pathogens • reducing greenhouse gas emissions and adapting to climate change • reducing pollution from nitrates and ammonia • managing risks to heritage assets, including historic landscapes • promoting Welsh language and dialects <p>While in general it is expected that there may be additional intensification pressure (dairy sector) on lowland areas, and potential withdrawal from upland areas (sheep sector) there are many second order and human effects which it is not considered appropriate to speculate on in the Management Plan although of course</p>	

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			<p>this is relevant to mitigation of the human and financial impacts of changes in the agricultural sector and the Authority's duty in pursuit of National Park purposes.</p> <p>Welsh Government's proposed Sustainable Farming Scheme has great potential to contribute to impacts specified in the draft Management Plan as well as providing a potential new income stream to land managers after Britain's exit from the European Union. The Welsh National Park Authorities, in their response to the <i>Sustainable Farming and Our Land</i> consultation, have proposed detailed discussion with Welsh Government about co-designing the scheme, developing and delivering pilot and demonstration projects, as a means of delivering Management Plans and Welsh Government's intentions set out in "Valued and Resilient".</p>	

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			No change to the draft Management Plan is recommended.	None.
MP033	Natural Resources Wales	There is also much discussion on the subject of ecosystem resilience but how will enhancing resilience affect the Park landscape and its Special Qualities? Perhaps this is again a research subject for the 3 Parks to collaborate upon? There may be a requirement to share new perspectives with stakeholders or education / engagement prior to implementing new approaches for enhanced resilience post Brexit.	A resilient landscape (one in which natural processes, semi-natural habitats and associated species are restored over a greater overall area) would be expected to look, sound and generally 'feel' different. People's perceptions and expectations of landscape (naturalness, wildness, tranquility etc.) vary, and will continue to, especially in the context of climate change, but in general a resilient landscape would be expected to enrich or restore special qualities and generally add to the people's potential enjoyment and understanding of the National Park. No change to the draft Management Plan is recommended.	None.
MP034	Lamphey Community Council	This document doesn't include Freshwater East and this should be included.	A follow-up email was sent to the respondent seeking clarification on any particular themes of interest or of concern	None.

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			<p>in order to address them satisfactorily in the National Park Management Plan and / or elsewhere. The following clarification was received:</p> <p>“The bit that we wanted changing was footnote 11 at the bottom of the page [page 15] which refers to a list of sites where recreational pressures should be managed. Specifically Policy W1f refers to inappropriate use of watercraft. As there is the issue of inappropriate use of jet skis (personal water craft) at Freshwater East Bay, we felt that Freshwater East should be included in the list of sites where recreational pressures should be managed. In fact a meeting was recently held by PCNPA with other stakeholders into this specific issue at Freshwater East Bay. There are conflicts between irresponsible jet ski users and other users of the bay such as swimmers, SUPs and</p>	

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			<p>kayakers.”</p> <p>Agree. Amend the footnote 11 in the draft Management Plan to: <i>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.</i></p> <p>Amend this policy footnote in the Sustainability Appraisal and Equality Impact Assessment for this policy footnote.</p> <p>(Note: Freshwater East is already marked on the opportunities / challenges maps for these recreational pressures.)</p>	None (clarification).
MP035	Friends of Pembrokeshire Coast National	The Friends of Pembrokeshire Coast National Park is an independent voluntary charity, founded in 1991 to help protect, conserve and enhance the		

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	Park	<p>Pembrokeshire Coast National Park for all who live, work or visit the Park, both now and in the future.</p> <p>We are grateful for the opportunity to comment on the plan. We are particularly pleased to see the reference to ongoing conversations as a critical friend to the National Park Authority we would welcome an ongoing dialogue to further shape this important document.</p> <p>We understand this is a period of uncertainty and operational stress however there is huge public support for our National Park and a real desire to be ambitious, particularly around the state of our natural world and the services that underpin it. We recognise the challenge of aligning the plan with emerging policies and plans such as NRW Area Statements and wider government initiatives.</p>		

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		We also recognise the good work carried out by all those involved in the day to day management of the Park.	Noted with thanks.	None.
MP036	Friends of Pembrokeshire Coast National Park	<p>Our response to the structure of the Plan</p> <p>Since our feedback earlier this year we feel there remain real structural flaws in the plan.</p> <p>Management of the National Park is confronted by the broad, global issues facing the natural world, alongside the impacts on these changes to local people and their communities here in Pembrokeshire.</p> <p><i>Valued and Resilient</i> (2018) is the latest guidance from Welsh Government for designated landscapes. This statement challenges National Parks to lead the way in delivering landscape scale action and this ambitious spatial approach is not clearly expressed in the draft plan.</p>	<p>A meeting with the Friends of the Pembrokeshire Coast National Park took place on 24th January 2019. A follow-up meeting took place on 26th February 2019. The Friends' views were sought informally on the content of an early draft Management Plan (version following the National Park Authority Member workshop of 3/4/19).</p> <p>The first opportunity / challenge at para 1.13 ("enabling ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment") was inserted partly as a result of these</p>	

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		<p>This guidance focuses on a range of challenges ranging from tackling climate change and improving biodiversity to enhancing cultural heritage and encouraging physical activity by promoting access to the National Park.</p> <p>The plan needs to realise these ambitions through robust, evidence based decision making, with clear, measurable outcomes based on evidence.</p> <p>We strongly disagree with the statement in 1.15 that outcome targets cannot be set in dynamic landscapes – without targets very little tends to happen. Desired policy impacts are too weak and impossible to measure. The background papers are full of carefully measured data and this surely needs to be used to set targets and measure progress. For example in <i>The State of</i></p>	<p>discussions and in acknowledgement of a key challenge identified in the Campaign for National Parks' June 2018 report <i>Raising the bar: improving nature in National Parks</i>.</p> <p>The Plan is evidence-based (key evidence sources used in the State of the Park Report are summarised at Annex C and include <i>The State of Wildlife in Pembrokeshire 2016</i>) and para 1.15 of the draft Management Plan is not intended to suggest that there will be no outcome monitoring, rather that there should be no upper bound for improvement for the state of the natural and historic resources of the National Park as might be implied by an outcome target.</p> <p>The overall aim of Welsh Government's Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP)</p>	

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		<p><i>Wildlife in Pembrokeshire 2016</i>, of the 23 monitored features only 3 were rated as being in GOOD condition. The majority of features assessed are in poor or moderate condition and the overall trend is still declining. Accurate assessment is hampered by a paucity of robust, long term data.</p> <p>This raises alarm bells and this should be tackled clearly within the plan, following the evidence and resulting in action and clear outcomes.</p> <p>Without a description of what success looks like and how progress will be measured nobody is accountable. This evidence based approach should be fundamental to all activities. Welsh Government is clearly focused on value for money and as new schemes develop, such as the Sustainable Farming Payment scheme, Management Plans will need to have</p>	<p>project, led by the Centre for Ecology and Hydrology, is to deliver a programme of monitoring and modelling which collects data across the Welsh landscape and links any changes to their impacts on a wide range of benefits including their economic consequences. The programme will be a key source of data for State of Natural Resources Reporting and will also undertake modelling for the EU exit process and the design and evaluation of programmes delivering to the Natural Resources Policy, notably the Sustainable Farming Scheme. The three National Park Authorities in Wales are project partners in ERAMMP.</p> <p>The impacts (outputs) listed are the proposed means to achieve the policies over the Plan period. These are for individual organisations and for partnerships and would be measured</p>	

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		<p>robust data in order to play a pivotal role in shaping landscapes and influencing the management of natural resources.</p> <p>The draft plan appears to be more of a policy framework rather than a Management Plan. It largely reflects what is already happening in the park rather than developing the future direction and focus.</p> <p>Framing the plan around a set of policies and impact areas (L1, W1, E1 etc.) is immensely confusing and doesn't clearly lead anywhere. Many of the actions are unspecific and centre around 'support, encourage, interpret, manage etc.'</p>	<p>through corporate planning processes and through management planning reporting.</p> <p>The impacts are intended to encourage wider engagement on and adaptive delivery. It is proposed that they are possible to measure and this could be a topic for further discussion as part of the ongoing conversation during Management Plan implementation and as a basis for reporting / celebration of achievements (para 1.5 Annex A to the draft Management Plan). Specific suggestions on the scope and adequacy of the ambitions that the impacts are intended to characterize would be welcomed, and these would be the basis of action plan monitoring.</p> <p>Amend the end of para 1.15 of the draft Management Plan by adding "Progress will be assessed through annual reports</p>	<p>None (clarification).</p>

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			<i>and State of the Park reporting.”</i>	
MP037	Friends of Pembrokeshire Coast National Park	A farmer looking for guidance or trying to understand his/her role within the National Park would not find this plan useful in describing or linking to relevant activities or programmes. Likewise a small business planning to develop sustainably and looking to gauge what this means in the National Park would be unlikely to find the plan useful.	Strategically significant programmes / partnerships are mentioned where relevant throughout the draft Management Plan. However, as a plan for the Park area, not just for the National Park Authority, it was generally not considered appropriate to add detail about individual partners' projects. Such projects tend to change over five years (the Management Plan period) and up to date information is generally readily available from partners' corporate plans and / or their websites. This includes information on the National Park Authority's replacement Local Development Plan for the National Park (in regard to which the approach taken during Management Plan drafting has been not to anticipate or prejudice any specific policy outcomes arising from that process). No change to the draft Management	

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			Plan is recommended.	None.
MP038	Friends of Pembrokeshire Coast National Park	<p>A list of partner organisations which have helped develop the plan would demonstrate the breadth of input and responsibility. This group approach could then be built on in future plan development. These partnerships will be instrumental in helping to deliver the Plan's vision and objectives.</p> <p>A further way of involving all the relevant partners effectively would be to establish some form of local advisory group or partnership board. This would include key stakeholders such as farmers, industry, NRW and others with a view to reviewing progress on the delivery of the Management Plan on an ongoing basis and championing specific issues.</p> <p>A set of high priority actions to spearhead this new plan would provide</p>	<p>A draft Report of Consultations accompanied the consultation draft Management Plan. This detailed all the engagement that had taken place, with named stakeholder organisations and groups.</p> <p>A Reference Group was set up during the plan drafting process. Members are relevant authorities indicated by Section 62 of the Environment Act 1995 and are: Amgueddfa Cymru National Museum Wales; Dyfed-Powys Police; Hywel Dda University Health Board; Mid and West Wales Fire and Rescue Service; Natural Resources Wales; Pembrokeshire County Council; Port of Milford Haven. It is likely that the group will continue to meet during implementation.</p> <p>It is accepted that there is a need to</p>	

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		<p>focus and the option of 'launching' the plan across the National Park as well as highlighting the current pressures and opportunities. The draft plan as expressed would just quietly emerge. It would benefit from a clear, strong executive introduction which would encapsulate the state of this particular park and present the vision and ambition over a timescale.</p>	<p>engage on National Park management with a more representative range of stakeholders and to become more of an ongoing conversation with continuous learning. An engagement action plan group (National Park Authority staff) arose partly in response to this.</p> <p>It is also a Welsh Government priority, as set out in <i>Valued and Resilient</i> (2018).</p> <p>Shared ambitions for national parks and national park authorities, contained in <i>Valued and Resilient</i>, are listed in Annex A of the Management Plan. The 70+ impacts listed in the Plan also represent ambitions for the Plan period (other ambitions for the Authority will be contained in its annual corporate plans).</p> <p>Amend the foreword to include reference to opportunities / challenges.</p>	<p>None.</p>

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MP039	Friends of Pembrokeshire Coast National Park	The plan adopts a vision to 2050 but there's little evidence of how this is built in. The plan for climate change, for example, needs to feature forecast and adaptation scenarios and cross reference to other activities and evidence.	Disagree. The example given (climate change) is extensively addressed within the Sustainability Appraisal and the State of the Park Report. Desired management impacts, relating to local and national issues, are given in the draft Management Plan (e.g. N1 (a) to (d)). Further discussion as part of the ongoing conversation during Management Plan implementation (action planning) would be welcomed. No change to the draft Management Plan is recommended.	None.
MP040	Friends of Pembrokeshire Coast National Park	In our response to the recent Welsh Government consultation on sustainable farming we made the point that their scheme needed to take account of the National Park Management Plan. We would expect to see success criteria for the special qualities and a plan that sets out how these are to be achieved and by whom.	Welsh Government's proposed Sustainable Farming Scheme has great potential to contribute to impacts specified in the draft Management Plan (see Annex para 1.8) as well as providing a potential new income stream to land managers after Britain's exit from the European Union. Policy E1 (o) is to "Support local delivery of the Welsh Government's proposed	

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		<p>For example, having identified coastal splendour as a special quality it does not get a further mention in the plan.</p> <p>A Management Plan would be expected to identify the current status of these qualities, any pressures or future predicted conflicts, and how the plan would address them. We would expect the themes to address the special qualities, the purposes and opportunities and threats.</p>	<p>sustainable agriculture scheme.” (This has since become known as the Sustainable Farming Scheme.)</p> <p>The Welsh National Park Authorities, in their response to the <i>Sustainable Farming and Our Land</i> consultation, have proposed detailed discussion with Welsh Government about co-designing the scheme, developing and delivering pilot and demonstration projects, as a means of delivering Management Plans and Welsh Government’s intentions set out in “Valued and Resilient”.</p> <p>The draft Management Plan is supported by a State of the Park report and a Sustainability Appraisal. These include references to national and local landscape assessment / characterisation and are influential in setting the scene for the opportunities, challenges and responses</p>	

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			<p>(impacts) identified.</p> <p>The National Park Authority will work with partners to implement and monitor the Management Plan. Partners will be encouraged to adopt the Plan and / or the impacts within it and to celebrate those contributions. An action plan which highlights annual campaigns or themes, for example by focusing on heritage, conservation, or responses to climate change, will be prepared. The action plan can also provide a focus for funding bids.</p> <p>Technical update: amend the Management Plan where relevant to refer to the “Sustainable Farming Scheme”.</p>	None.
MP041	Friends of Pembrokeshire Coast National Park	The land use planning dimension of the National Park Management Plan is put into effect through the Local Development Plan. We would like to see the Management Plan having the	Noted. This version of the Management Plan has deliberately stepped away from the detailed planning approach with the aim of making intentions more accessible, determining more readily if they are	

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		ambition to become a far more substantial and focused document that was aligned with similar plans across designated landscapes in Wales.	<p>necessary and sufficient, and fostering a more adaptive approach to management (by being less prescriptive about the 'how' for partner organisations). The accompanying assessments, reports and maps include a considerable amount of detail. Please also see below regarding the need to prepare an Action Plan.</p> <p>No change to the draft Management Plan is needed.</p>	None.
MP042	Friends of Pembrokeshire Coast National Park	<p>Developing a spatial approach to the expression of the special qualities alongside the other spatial information that now exists would begin to build up a much clearer sense of what can be achieved and where the work should focus in the near future.</p> <p>If this could be acknowledged as an ambition within the plan it would set a useful direction for a wide range of potential projects.</p>	<p>Evidence in the form of opportunities / challenges maps and state of the Park information support the Management Plan (and were available as part of the consultation) and will evolve alongside its implementation.</p> <p>The State of the Park report includes maps and summaries of Landscape Character Assessment characteristics and sensitivities. Original material</p>	

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			<p>characterising the National Park in terms of biodiversity are included on pages 59-70 and can be used to influence the design of specific projects.</p> <p>Specific comments on the maps (which will be kept updated during the Plan period) would be welcomed.</p> <p>The intention is also to progress areas of work through preparation of an Action Plan. This will help to progress the work already done as suggested.</p> <p>No change to the draft Management Plan is needed.</p>	None.
MP043	Friends of Pembrokeshire Coast National Park	We would welcome further discussion on any aspects of the above.	<p>Noted with thanks. A number of areas for further discussion are identified above.</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP044	Cadw	Thank you consulting Cadw on the draft		

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>Pembrokeshire Coast National Park Management Plan. Our Senior Historic Environment Planning Officer and our Regional Inspector note that the management plan includes a section (number 5) Celebrating Heritage. This gives a list of actions aimed to conserve, maintain and monitor heritage assets. The implementation of these actions will protect the historic environment. The plan also includes continuing to monitor heritage crime – a very welcome action. We have no other comments to make.</p>	<p>Noted with thanks.</p>	<p>None.</p>
MP045	Pencaer Community Council	<p>Having now read the consultation document it is noted that the proposals are basically for no major changes within the National Park Management Programme.</p> <p>However, there are two references, which council members felt should be</p>	<p>Biodiversity declines are of great concern.</p>	

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		<p>drawn to the Authority's attention, These are bio-diversity and support for the Welsh Governments proposed sustainable agriculture scheme.</p> <p>In terms of bio-diversity members wish to point out that there is substantial problem over natural predator within the Park area, both on the ground and in the air. Much of the small animal bio-diversity normally experienced in the Park area has disappeared, for example, there are very few hedgehogs, ground mammals and in particular ground nesting birds. It is believed that the main causes of such losses are the badger and fox predators, together in some cases with others who remove eggs, young mammals and in particular hedgehogs from the area.</p>	<p>These include declines in species groups in addition to those mentioned in the response (for example butterflies). The <i>Nature Recovery Plan for Wales</i> lists four attributes of resilience: increasing diversity; increasing ecosystem extent through reducing fragmentation; increasing connectivity within and between ecosystems, and improving habitat condition, and it is intended that actions to fulfil these will halt and reverse biodiversity declines.</p> <p>However, natural predation is not considered to be a primary threat when compared to human factors. The <i>State of Nature 2019</i> (State of Nature Partnership, 2019) for example cites the following headline pressures on wildlife: agricultural management (increasing productivity), urbanisation, pollution, hydrological change, woodland management and</p>	

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		<p>The same situation exists in the air with a number of predator birds, namely, ravens, rooks, carrion crows, magpies, all predating on the small bird population. There are obviously other predators such as peregrine falcons, sparrow hawks, etc., but it is believed their numbers being much lower than the other birds set out above do not have the same effect on the small bird population.</p> <p>This problem of animal bio-diversity as things stand at the moment is more likely to get worse than better.</p>	<p>invasive non-native species, with climate change expected to drive widespread changes in the abundance, distribution and ecology of Wales' wildlife in future.</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP046	Pencaer Community Council	<p>On page 19 under the paragraph headed 'A resilient Park' item o. refers to the Welsh Government's proposed sustainable agriculture scheme. The document published by Welsh Government is a very substantial document of over 150 pages. It</p>	<p>Noted. The three National Parks in Wales have responded to the Welsh Government's consultation <i>Sustainable Farming and Our Land</i>. This makes a</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>includes proposals of a fairly drastic nature, and in particular the cessation of the existing basic farm payment by the year 2022. Many commentators and interested parties view this most immediate cessation of the farm payment as unwise. Furthermore, the proposals for environmental payments etc. are likely to be fairly complicated and take considerable time to work out. Particularly as England is extending the basis of the single farm payment, although on a reducing scale for 7 years, Welsh Government should look at a much longer transition period for the introduction of its new scheme.</p> <p>These comments have been considered by the Pencaer Community Council and cover their current opinions, for submission to the Pembrokeshire Coast National Park.</p>	<p>number of points on the subject of transition and funding, and it is our understanding that Welsh Government has signaled that finance will continue to flow until new arrangements start. National Parks Wales' response also emphasizes the importance of maintaining / cultivating local strengths and land manager relationships in delivery. The Authorities would wish to continue to support land managers in their delivery of shared outcomes.</p> <p>No change to the draft Management Plan is recommended.</p>	<p>None.</p>

APPENDIX 13 – REPRESENTATIONS ON THE CONSULTATION DRAFT SUSTAINABILITY APPRAISAL

Ref.	Respondent	Representation on the draft Sustainability Appraisal	Officer comments and recommendations	Assessment of effects (for Habitats Regulations Assessment and Equality Impact Assessment)
SA001	Uzmaston, Boulston and Slebech Community Council	<p>4(b) Do you agree with the Sustainability Appraisal's assessment of the impacts of the draft Management Plan on the Welsh language?</p> <p>Yes</p>	<p>Noted. No change to the draft Sustainability Appraisal is recommended.</p>	None.
SA002	Pembrokeshire County Council	<p>4. (a) Do you agree with the Sustainability Appraisal of the draft Management Plan?</p> <p>Yes.</p>	<p>Noted. No change to the draft Sustainability Appraisal is recommended.</p>	None.
SA003	Pembrokeshire County Council	<p>4(b) Do you agree with the Sustainability Appraisal's assessment of the impacts of the draft Management Plan on the Welsh language?</p>	<p>Noted.</p>	

Ref.	Respondent	Representation on the draft Sustainability Appraisal	Officer comments and recommendations	Assessment of effects (for Habitats Regulations Assessment and Equality Impact Assessment)
		Yes.	No change to the draft Sustainability Appraisal is recommended.	None.

APPENDIX 14 – REPRESENTATIONS ON THE CONSULTATION DRAFT HABITATS REGULATIONS ASSESSMENT

Ref.	Respondent	Representation on the draft Habitats Regulations Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Equality Impact Assessment)
HRA001	Dyfed Archaeological Trust	<p>6. Do you agree with the Habitat Regulations Assessment of the draft Management</p> <p>Yes</p>	<p>Noted. No change to the draft Habitat Regulations Assessment is recommended.</p>	None.
HRA002	Pembrokeshire County Council	<p>6. Do you agree with the Habitat Regulations Assessment of the draft Management Plan?</p> <p>Yes.</p>	<p>Noted. No change to the draft Habitat Regulations Assessment is recommended.</p>	None.

APPENDIX 15 – REPRESENTATIONS ON THE CONSULTATION DRAFT EQUALITY IMPACT ASSESSMENT

Ref.	Respondent	Representation on the draft Equality Impact Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Habitats Regulations Assessment)
EqIA001	Dyfed Archaeological Trust	<p>5(a) Do you agree with the Equality Impact Assessment of the draft Management Plan?</p> <p>Yes</p>	<p>Noted. No change to the draft Equality Impact Assessment is recommended.</p>	<p>None.</p>

Ref.	Respondent	Representation on the draft Equality Impact Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Habitats Regulations Assessment)
EqIA002	Dyfed Archaeological Trust	<p>5(b) Can you provide detail in relation to specific questions asked in the Equality Impact Assessment? (Please see the “Actions and Implementation” tables at the end of the Equality Impact Assessment for a summary of these.)</p> <p>Opportunities for less mobile members of a community to engage with the historic environment/cultural heritage. One way of achieving this could be travelling ‘road shows’ bringing teaching collections to adults with dementia of mobility issues. Engaging all members of communities promoting inclusivity and the historic environment.</p>	<p>Noted.</p> <p>Amend and Update Equality Impact Assessment: Comments included in Equality Impact Assessment under H1 and to be actioned through Project level response in terms of H1a, WC1 and WM1.</p>	None.

Ref.	Respondent	Representation on the draft Equality Impact Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Habitats Regulations Assessment)
EqIA003	Dyfed Archaeological Trust	Many opportunities for supporting policies on religion and belief as many historic monuments are 'sacred' in nature. A more 'open door' approach providing access to certain sites at certain times.	Noted. Amend and Update Equality Impact Assessment: Comments included in Equality Impact Assessment under H2 and to be actioned through Project level response to H2d.	None.
EqIA004	Dyfed Archaeological Trust	Heritage trails/walks with children exploring historic landscapes. Generally speaking seeking out opportunities for community led excavations. Specifically to address the issue of promoting physical activity for girls - Land army days working on a farm?	Noted. Amend and Update Equality Impact Assessment: Comments included in Equality Impact Assessment under W2 and to be actioned through Project level response to W2a.	None.
EqIA005	Pembrokeshire County Council	7. (a) Do you agree with the Equality Impact Assessment of the draft Management Plan? Yes. This is a very thorough and detailed assessment that shows how consideration of equalities issues has influence how the	Noted with thanks. No change to the draft Equality impact	

Ref.	Respondent	Representation on the draft Equality Impact Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Habitats Regulations Assessment)
		Management Plan has developed.	Assessment is recommended.	None.
EqIA006	Pembrokeshire County Council	<p>5 (b) Can you provide detail in relation to specific questions asked in the Equality Impact Assessment?</p> <p>We welcome the opportunity for further dialogue and note that we are already working in partnership with PCNPA and other organisations on the development of new Strategic Equality Plans.</p>	Noted with thanks.	None.