

Draft Report of Consultation on The Draft Scoping Report for the Pembrokeshire Coast National Park Management Plan

Overview

Statutory consultees, Cadw and Natural Resources Wales were consulted on the Draft Scoping Report for the Sustainability Appraisal (incorporating Strategic Environmental Assessment) for The Pembrokeshire Coast National Park's Management Plan Review (2025-2029). The statutory consultees were consulted on the following documents:

- Draft Sustainability Appraisal (incorporating Strategic Environmental Assessment) Scoping Report
- Appendix A – Review of Relevant Plans, Policies and Programmes
- Appendix B – Baseline Information

The consultation was over a five-week period from 26 April to 31 May 2024.

Consultation responses received

The following comments were received from Cadw and NRW which are summarised in the table below, together with a response from the National Park Authority regarding changes made to the Scoping Report and appendices.

Respondent		Representation	National Park Authority response and change made to Scoping Report and appendices
Cadw	Context and proposed objectives	Cadw have no issues with the context and proposed objectives.	Noted.

Cadw.	Section 2.0 Relevant Plans, Policies and Programmes	Reference to the "Ancient Monuments & Archaeological Areas Act 1979 (as amended)" and also the "Historic Environment (Wales) Act (as amended), Welsh Government, 2016 as amended 2023". The Historic Environment (Wales) Act 2023 is not an amendment Act to the 2016 Act, instead it is a consolidation Act that will replace The Ancient Monuments and Archaeological Areas Act 1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990.	Agreed and the following text has been added: The Historic Environment (Wales) Act 2023 (consolidation Act to replace The Ancient Monuments and Archaeological Areas Act 1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990.
NRW	Section 2.0 Relevant Plans, Policies and Programmes	NRW suggested adding the documents.	Agreed and added the following documents to section 2.0 Relevant Plans, Policies and Programmes and Appendix A: Review of Relevant Plans, Policies and Programmes: <ul style="list-style-type: none"> • Evidence for the third UK Climate Change Risk Assessment (CCRA3) Summary for Wales (2022) • Draft Noise and Soundscape Plan for Wales 2023-2028 Welsh Government • Wales Biodiversity Deep Dive • Wales Natural Resources Policy, Welsh Government • Cymraeg 2050 Welsh language strategy (Welsh Government) 2017. • Historic Environment and Climate Change in Wales Sectoral Adaptation Plan Cadw (2020) • The National Peatland Action Programme (NRW)

			<ul style="list-style-type: none"> • Pembrokeshire Climate Adaptation Strategy, Public Services Board, 2022 • State of Natural Resources Report (SoNaRR) for Wales 2020 • Natural Resources Wales Flood Risk Management Plan: South West Wales Place (2023 – 2029) • South West Wales Stage 1 Strategic Flood Consequences Assessment, Final Report, November 2022 • Carmarthenshire Local Flood Risk Management Strategy 2024-2029 (2024) • Western Wales River Basin Management Plan 2021-2027, NRW
NRW	Section 4.0 Identification of Sustainability Issues.	The representation questioned whether the issues identified were in a hierarchy as expected biodiversity target to be more prominent.	Added in paragraph 4.2 the issues identified through the above process are summarised below, “and are not ordered in terms of importance”
NRW	Section 2.0 Relevant Plans, Policies and Programmes	References to biodiversity throughout the document should be widened to refer to ecology, ecological resilience, habitats and habitat connectivity.	Agree and changes made throughout the document.
NRW	Section 4.0 Identification of Sustainability issues	Biodiversity and nature recovery should get greater prominence since there is a high correlation between natural beauty and biodiversity hot-spots. A key issue across Wales is lack of ecological resilience (SoNaRR) therefore Nature	Agree and biodiversity references throughout have been broadened to refer to ecological resilience, habitats, habitat connectivity.

		<p>Recovery / improving ecosystem resilience should be an important focus.</p> <p>Throughout the document there is reference to biodiversity but widen this to refer to ecology, ecological resilience, habitats and habitat connectivity.</p>	
NRW	Section 4.0, Issue 1: Effects of climate change.	<p>Introduce that part of the issue is a necessity to mitigate and adapt to the changing climate as by not mitigating and adapting the issue and consequences will be exacerbated. Climatic changes also impact on other issues, e.g. agriculture and land management, which impacts on landscape, resilience to flooding, ecological resilience and community, social and economic well-being.</p>	<p>Agree and change made with the addition of the following:</p> <p>On top of this the country is expected to experience more frequent and intense rainfall, hotter drier summers “which impacts on agriculture and land management. It is necessary to mitigate and adapt to the changing climate to protect the landscape, resilience to flooding, ecological resilience and community, social and economic well-being.”</p>
NRW	Section 4.0, Issue 1: Effects of climate change.	<p>Include coastal squeeze as another important issue for coastal habitats resulting from rising sea levels. Risk also to coastal heritage and the National trail</p>	<p>Agree and change made with the addition of the following</p> <p>As a result of this it would be likely that coastal areas of Wales would suffer more frequent and severe flooding, coastal erosion and coastal squeeze. This would negatively impact existing habitats and biodiversity, infrastructure including the National trail and communities.</p>
NRW	Section 4.0, Issue 2: Impact of recreation and tourism and	<p>Add in reference that wildfires can arise from coastal activities like BBQs</p>	<p>Agreed and change made with the addition of the following:</p> <p>However, in some instance, there can be negative impacts of these activities</p>

	associated development		including traffic congestion, disturbance from activities such as jet skiing, potential for wildfires resulting from BBQs and increased demands on the public service infrastructure. Tourism is sometimes a driver for inappropriate development proposals in the National Park.
	Section 4.0, Issue 3 Landscape sensitivity to development	Is this issue one of Maintaining and Enhancing Natural Beauty, combine with Issue 14 Important Landscape Resource? Natural Beauty is the key landscape issue for NP's, with Development Management just one strand. Set out the Natural Beauty pressures and trends for review of management plan policy response.	Disagree and the issues cover different pressures on the landscape.
	Section 4.0, Issue 3 Landscape sensitivity to development	Landscape change modelling in response to a changing climate and nature recovery would be helpful to promote awareness, engagement and support communities.	Agreed and change made with the addition of the following: Landscape change modelling in response to a changing climate and nature recovery can help to promote awareness, engagement and support communities.
	Section 4.0, Issue 5: The physical environment	The physical environment itself isn't the issue but pollution or degradation of the natural resources air quality, soil quality and water quality.	Agreed and change made to the title of issue 5 to: <i>Protection of the physical environment</i> <i>And added the following sentence</i> Natural resources, such as air quality, water supply and quality and soil quality need to be protected.
		Not sure why specifically picking on Solva and Gwaun any more than other coastal streams? Solva is currently classed as good and the	Agree and reference to river Solva and Gwaun deleted.

		Gwaun moderate and both estuaries fail for DIN (dissolved inorganic nitrogen). The statement about water quality in general being at risk from diffuse pollution.....is accurate.	
		Need to ensure that the 2021 classification has been used as in the list of documents the WFD summary referred to was the previous one.	To be updated in Appendix B Baseline Information.
		Given the high profile and awareness of water quality issues in the Cleddau catchment this text may be a bit scant and could possibly be expanded to explain some of the issues caused by polluted water?	Agree and the following text has been added: The main causes of phosphorous entering rivers is agricultural runoff from use of fertilizers, manure and soil erosion, waste water discharges and storm water run off, industrial activities and natural sources. High levels of phosphorous can lead to algal blooms, oxygen depletion causing harm to aquatic ecosystems.
		Given the high profile and awareness of water quality issues in the Cleddau catchment this text may be a bit scant and could possibly be expanded to explain some of the issues caused by polluted water? Suggested change to text would be....In general river quality is classed as moderate under the WFD. Priority issues affecting water quality in the Park include diffuse and/or point source pollution, physical alteration and/or alien species. A small number of rivers, including.....	Agree and added the following: In general, river quality is classed as moderate under the Water Framework Directive. Priority issues affecting water quality in the Park include diffuse and/or point source pollution, physical alteration and/or alien species. The main causes of phosphorous entering rivers is agricultural run off from use of fertilizers, manure and soil erosion, waste water discharges and storm water run off, industrial activities and natural sources. High levels of phosphorous can lead to

			algal blooms, oxygen depletion causing harm to aquatic ecosystems.
		May also like to reference the fact that water quality impacts upon overall ecological resilience (hence overall WFD classification) so an issue for ecology/biodiversity as well as society for drinking and amenity/recreation	Agree and added: Water quality impacts upon overall ecological resilience and ecology and biodiversity as well as impacts on the quality of drinking water and recreational activities.
		More recently in Jan 24 NRW published an assessment of the compliance of Welsh River SACs against a number of other water quality targets including e.g. Dissolved Oxygen and total and unionised ammonia. Afonydd Cleddau and Teifi were amongst those with most target failures. The majority of failures were for BOD (Biochemical Oxygen Demand) and Trophic diatom index but the Afonydd Cleddau also shows consistent issues with ammonia inputs.	Agree and the following text has been added: In January 2024, NRW published an assessment of the compliance of Welsh River SACs against a number of other water quality targets including Dissolved Oxygen and total and unionised ammonia. Afonydd Cleddau and Teifi were amongst those with most target failures. Bathing water quality in the National Park is generally classed as good or excellent, however, there can be issues with storm overflows impacting bathing water quality.
		Is there a need to include reference to availability of water resources for both people and the environment? The Eastern and Western Cleddau catchments provide most of Pembrokeshire's public water supply. As these rivers are designated Special Areas of Conservation (SACs) and therefore afforded a high level of environmental protection, there is potential conflict with the demand for water.	Agree and the following text has been added: The Eastern and Western Cleddau catchments provide most of Pembrokeshire's public water supply. These rivers are designated Special Areas of Conservation (SACs) and are afforded a high level of environmental protection which can result in potential conflict with demand for water.

		<p>Could include Bathing water quality - for the main part excellent but highly relevant to the National Park for recreation. It is reported in Appendix B - Baseline data</p>	<p>Agree and the following text has been added: Bathing water quality in the National Park is generally classed as good or excellent, however, there can be issues with storm overflows impacting bathing water quality.</p>
		<p>Stating predicative agricultural land classification doesn't really state an issue. The impact of climate change on that soil classification may present an issue (https://www.gov.wales/sites/default/files/publications/2021-04/agricultural-land-classification-projected-effect-climate-change.pdf). The farming practices that the good land classification facilitates is what places a pressure on the landscape and underpinning natural resources.</p> <p>The actual issue is really soil erosion, soil run-off or degradation of soil due to land management that leads to soil erosion or run-off or loss of carbon.</p> <p>It would be good to mention the presence of any peat soils in the park (https://smnr-nrw.hub.arcgis.com/apps/d18ef8c74ecc4dc4a0cbf71ab6935ba0/explore)</p> <p>- issue would be inappropriate land management practices leading to soil degradation and consequent loss of soil, nutrients and carbon stores.</p>	<p>Agricultural land classification is an issue and the following text has been added for clarification:</p> <p>With regard to soil quality, within the National Park there is a high proportion of the Best and Most Versatile Agricultural Land (BMV) which national planning policy specifies should be conserved as a finite resource for the future.</p> <p>Future developments, climate change and farming practices have the potential to impact on soil erosion, loss of soil, nutrients and carbon stores, soil run-off and degradation of soil. Nature based solutions can alleviate the risk and protect soil.</p> <p>Text and map showing peat land to be including in Appendix B Baseline Information.</p>

		Soil erosion and run-off under also links the issue of flooding and flood risk. Nature based solutions within the physical environment can alleviate the risk - see also comments to issue 7.	
	Section 4, Issue 7 Role of agriculture (and other land based businesses)	Changes to the type of agricultural practices and agricultural land management as a consequence of the changing climate and evolving fiscal policy will be a significant factor affecting the national park landscape, resilience to flooding, ecological resilience and community social and economic well-being	Agree and added the following text: Changes to the type of agricultural practices and agricultural land management as a consequence of the changing climate and evolving fiscal policy will be a significant factor affecting the national park's landscape, resilience to flooding, ecological resilience and community social and economic well-being.
	Section 4, Issue 7 Role of agriculture (and other land based businesses)	In April 2021 the designated NVZs in Wales were revoked by the introduction of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations with some measures transitioning into law over a period of time. The Welsh government has decided to declare the whole country a Nitrate Vulnerable Zone (NVZ).	Agree and amended the text to read: In 2021 the designated Nitrate Vulnerable Zones were revoked by the introduction of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations. The Welsh Government has declared. an all-Wales Nitrate Vulnerable Zone (NVZ).
	Section 4, issue 9 The use of the marine environment	Maybe worth mentioning other factors coming to greater prominence e.g. aquaculture Also think could mention emergence of renewable energy (cross ref to Issue 6) and recreation (cross ref issue 20) as although these are covered elsewhere they are things	Agreed and the following text has been added: Principal factors affecting the marine environment around Pembrokeshire are shipping activity around Milford Haven, commercial fishing, together with increasing demand for aquaculture,

		which impact the use of the marine environment	renewable energy (issue 6) and recreation (issue 20) including inappropriate use of powered craft.
	Section 4, issue 11 Important archaeological & historic resources	Is the issue to ensure the preservation of or to protect or conserve? Maritime archaeology?	Agree and changed title to: Protect, promote, conserve and enhance importance archaeological & historic resources.
	Section 4, issue 12 Important biological resources	<p>Important biological resources is not really the issue. The issue would be decline or degradation of or detrimental impact to important biological resources.</p> <p>Perhaps use DECCA framework to comment on impact? A comment on the state of the parks biological resources could help identify the issue. Or the issue could be the need to protect or preserve the important biological resources. The Issue could also link and refer to wider ecology, fragmentation of habitats/importance of connectivity and clean unpolluted natural resources (air, water and soil) so text expansion to explain the issue or consequences of any negative impact on ecological resilience. This also links to resilience to changing climate.</p> <p>Suggest use 'Nature Recovery' to talk about the situation and focus on raising ambition to restore nature, which is a key part of Natural</p>	<p>Agree and changed title of issue to: <i>Maintain and enhance important biological resources</i></p> <p><i>The following text has been added.</i> The step-wise approach and the DECCA framework set out in Planning Policy Wales will be the means to demonstrate the steps have been taken towards securing a net benefit for biodiversity and improve habitat connectivity and ecological resilience.</p>

		Beauty. The impact of intensive agriculture on biodiversity is far reaching.	
	Section 4, issue 21 The national role of the National Park in improving health and wellbeing	What is the issue?	Agree and changed title to: <i>The opportunity of the National Park to improve health and well-being</i>
	Section 4, issue 22 Cultural Distinctiveness	Landsker line?	Appendix B: Baseline information includes statistics on the spatial distribution of Welsh speakers in Pembrokeshire. No change required.
	Section 5: Sustainability Objectives, Objective 1 – agriculture and forestry	Suggest expanding the text to better reflect the message that viability of these sectors is important as they play a key role in helping manage our natural resources - for conserving and enhancing landscape, habitats, ecological resilience and for nature based solutions that reduce flood risk (see also comments to issue 7 and issue 5). Also all these factors are important for community well-being.	Agree and the following text has been added: Economically viable agriculture and forestry sectors play a key role in managing, conserving and enhancing natural resources ; landscape, biodiversity, including habitats, ecological resilience, nature based solutions that reduces flood risk and contribute to community well-being.
		If Managing Natural Resources (sustainably) is the cluster then 23 Minerals should also be included	Disagree, the objective relates to agriculture and forestry sectors only.
		? + issue 1 as agriculture and forestry planting and land management vital role in resilience to climate change	Agree and added issue 1 to the cluster of related issues.

	Section 5: Sustainability Objectives, Objective 3 - landscape	Suggest landscape is highest priority for National Parks. Include issue 2 and 7 due to impacts on landscape.	Disagree. Added clarity to paragraph 5.2 The sustainability objectives are not listed in order of importance.
		Is this where dark skies would get included?	Dark Skies are a subset of tranquillity which is a special quality of the National Park
	Section 5: Sustainability Objectives, Objective 4 - recreation	Sustainably increase the number of..... Due to the impact of recreation (issue 2) how can increases be managed sustainably? Especially in light of coastal pressures from climate change and the need for nature recovery.	Agree and added sustainably to the objective for clarity. Agree and added that the needs of recreation need to be balanced against environmental limits.
	Section 5: Sustainability Objectives, Objective 6 – climate change adaptation	Suggest including reference to coastal erosion, wider ecological impact and the importance of ecological resilience for adaptation. Green/blue carbon capture potential. Coastal squeeze. Linked to public health could also elaborate slightly to mention that coastal erosion will impact upon Wales Coast Path, PRow. Already happening e.g. Wisemans Bridge. Adaptation will also be required to protect public services.	Agree and added the following: Manage the effects of and adapt to climate change with particular reference to the risk of flooding, coastal erosion and coastal squeeze which could negatively impact on existing habitats and biodiversity, infrastructure including the National trail and community, social, economic and well-being including public health.
		Reflecting the significance of the subject we suggest put Climate Change near the top with Landscape and Nature Recovery.	Disagree. Added clarity to paragraph 5.2 The sustainability objectives are not listed in order of importance.
		? + issues 5 and 7 - role of agri land management also issue 17 as will impact on services and service provision	Agree and added issues 5, 7 and 17 to the cluster of related issues.

	Section 5: Sustainability Objectives, Objective 7 – climate change mitigation	Would suggest a bit of additional explanation around mitigating against climate change e.g energy and transport.	Agree and wording amended as follows: Mitigate and reduce factors contributing to climate change by reducing greenhouse gas emissions from transport and energy use.
		? + issue 7 Agri has important role when reducing actors contributing to climate change as well as important role in mitigating	Agree and added issue 7 to the cluster of related issues.
	Section 5: Sustainability Objectives, Objective 11 – minerals	?+ issue 5	Agree and added issue 5 to the cluster of related issues.
	Section 5: Sustainability Objectives, Objective 13 – community facilities	? possibly issues 20 and 21 - although perhaps not included as not fabric facilities but provide facilities nevertheless	Agree and added issues 20 and 21 to the cluster of related issues.
	Section 5: Sustainability Objectives, Objective 14 - biodiversity	Should this be wider than biodiversity? ecosystem resilience? habitats and habitat connectivity?	Agree and added the following: Maintain and enhance biodiversity, ecological resilience, habitats and habitat connectivity both within and outside designated sites.
		Suggest Nature Recovery as title. Also position more prominently to reflect it's importance.	Disagree, the sustainability objectives do not have titles and the following clarity has been added to paragraph 5.2 The sustainability objectives are not listed in order of importance.

		?+ issue 5 agri practice/land management and adoption of nature based solutions vitally important	Agree and added issue 5 to the cluster of related issues.
	Section 5.10 Intercompatibility of the Sustainability Appraisal Objectives	Compatibility of SA Objective 3 (conservation of landscapes, townscapes etc) and Objective 4 (increase physical forms of recreation); if impacts are to be reduced, more management will be required.	Agree that increasing the number of residents and visitors taking part in physical forms of recreation, especially walking and cycling and volunteering opportunities would require more management. The compatibility between the objectives is marked as unknown and no change required.
		Compatibility of SA Objective 9 (encourage access for all to the National Park) and objective 1 (Economic viability and conservation role of agriculture and forestry). Comment made that there are lots of public rights of way on agricultural land.	Agree that there are public rights of way on agricultural land and effect changed to unknown.
		Compatibility of SA objective 9 (encourage access for all to the National Park) and objective 7 (reduce factors contributing to climate change). There are likely negative climate impacts of additional access to the National Park.	Agree and change to potential negative impact.
		Compatibility of SA objective 12 (reduce the negative impacts of waste) and objective 1 (Economic viability and conservation role of agriculture and forestry). Agriculture and forestry industry can have impact of waste reduction as huge amounts of waste produced e.g. plastic silage wrap, tyres, pesticide and fertiliser containers	Agree and change to unknown impact as could have positive impacts if agricultural and forestry practices reduce waste or negative impacts due to their generation of waste.

		Compatibility of SA Objective 14 (maintain and enhance biodiversity) and Objective 4 (increase physical forms of recreation). Increased physical forms of recreation could increase visitor pressure which could impact on ability to maintain and enhance biodiversity.	Agree and change to potential negative impact.
		Compatibility of SA Objective 5 (increase visitors outside the peak visitor season) and objective 15 (sustainable use and quality of inland and coastal waters). If water resources and sewage systems can cope in peak season then increasing visitor numbers outside of peak season is possibly unlikely to cause incompatibility. Same thought applies to above 2 boxes? if compatible in peak season likely to be compatible outside peak season. This is an opinion rather than factual response.	Agree and changed objective 5 and 15 to compatible.
		Objective 5 (increase visitors outside the peak visitor season) and 12 (reduce the negative impacts of waste) may also be incompatible as increasing visitor numbers outside peak season may increase impact of waste?	Agree that waste may be increased, however if visitors from peak season visited outside of peak season then waste generation would be more even spread throughout the year and would be easier to manage. The impact is therefore unknown.
	Appendix A: Review of Relevant Plans, Policies and Programmes		Added the following documents in to Appendix A: Review of Relevant Plans, Policies and Programmes <ul style="list-style-type: none"> • Pembrokeshire Climate Adaptation Strategy, Public Services Board, 2022 • State of Natural Resources Report (SoNaRR) for Wales 2020 • Wales Biodiversity Deep Dive

			<ul style="list-style-type: none"> • Carmarthenshire Local Flood Risk Management Strategy 2024-2029 (2024) • South West Wales Stage 1 Strategic Flood Consequences Assessment, Final Report, November 2022 • Evidence for the third UK Climate Change Risk Assessment (CCRA3) Summary for Wales (2022) • Historic Environment and Climate Change in Wales Sectoral Adaptation Plan Cadw (2020) • Draft Noise and Soundscape Plan for Wales 2023-2028 Welsh Government • Cymraeg 2050 Welsh language strategy (Welsh Government) 2017. • The National Peatland Action Programme (NRW) • Western Wales River Basin Management Plan 2021-2027, NRW • Amendment to The Environment (Wales) Act 2023
	Appendix B: Baseline	The number of agriculture, forestry and fisheries enterprises has decreased in Pembrokeshire between 2010 and 2023. It would be interesting to know the area of land under agriculture to know whether that has changed and whether there is evidence of fewer businesses but larger more intensive operations farming the same area of land.	To be considered by NP's Research and Sustainability Appraisal Officer to see what information is available.
		Culture and language. Menter Iaith can advise. Eisteddfodau, Welsh language community groups and Papurau Bro are likely to feature here. Also a	To be considered by NP's Research and Sustainability Appraisal Officer to see what information is available.

		celebration of the diversity of the local Welsh spoken in Pembrokeshire. Links to the archaeology and built heritage.	
		A short profile of the different historic landscapes would be useful to link to character and special qualities.	To be considered by NP's Research and Sustainability Appraisal Officer to see what information is available.
		Water quality text is misleading / confusing. Need to clarify	NPA to update
		Water quality - Include a map of water bodies in NP with different classifications	To be considered by NP's Research and Sustainability Appraisal Officer to see what information is available.
		Update results of bathing water quality for 2023	Updated and added commentary regarding the results for 2023.
		Update data on Nitrate Vulnerable Zones as the whole of Wales is not a NVZ	Updated
		Consider the inclusion of information on water quantity as well as quality from a drought and water abstraction view. Water availability for licensing is set out in NRW's Abstraction Licensing Strategies (Originally called CAMs) These provide an overview of where and how much water is available for new abstraction licences. It takes into account existing abstractions and environmental requirements.	To be considered by NP's Research and Sustainability Appraisal Officer to see what information is available.
		Flooding - Include information on Shoreline Management Plans and coastal erosion – descriptions of the policies and epochs	Agree, to be updated
		Could compare flood risk areas identified with Wales Index of Multiple Deprivation given links to well-being?	To be considered by NP's Research and Sustainability Appraisal Officer to see what information is available.
		Importance of Public Rights of Way Network and Pembrokeshire Coast Path National Trail highlighted for tourism compared with flood risk and	To be considered by NP's Research and Sustainability Appraisal Officer to see what information is available.

		coastal erosion data? Include key access routes / public transport route as well as properties?	
		Include a map on peatland in NP	Agree, to be updated
		Is there landscape quality trend evidence and analysis for the Park? Pressures? To underpin review of policies for Natural Beauty?	To be considered by NP's Research and Sustainability Appraisal Officer to see what information is available.