

Pembrokeshire Coast National Park Partnership Plan: Public Consultation Response from Campaign for National Parks

26th September 2024

Summary

The below consultation response was submitted in response to Pembrokeshire Coast National Park Authority's consultation on their draft Partnership Plan which is detailed [here](#).

In summary our response focuses on 4 key areas of concern

- No strategic long-term vision
- No established 'partnership' for the preparation or delivery of the Plan
- The State of the Park report is insufficient and limited in scope
- Targets, monitoring and evaluation

Consultation Response

Dear Partnership Plan team,

Thank you for the opportunity to respond to this consultation. Due to the slightly limited nature of the consultation questions, we have decided to summarise our key concerns in this letter whilst also contributing as best we can to the online consultation process. We hope this approach is okay.

Campaign for National Parks is the only independent charity dedicated to securing the future of National Parks in England and Wales. Founded in 1936, we bring together a campaigning collective of organisations and individuals from all walks of life united in common cause. Our first campaigns resulted in the creation of our National Parks. Now, inspired by our past, we fight for the future.

Having carefully read the draft consultation and supporting documentation we have summarised below our main areas of concern followed by our answers to the consultation questions.

1) No strategic long-term vision

- **There is no clear long-term vision for the next 10,15,20 years.** The plan lacks a VMOSA (vision, mission, objectives, strategies and actions) or similar approach which establishes SMART objectives for the long-term. As an example, [Y Bannau](#) provides a mission-based approach which is clearly laid out through to 2050.
- Although the four themes (or wellbeing objectives as they are defined here: <https://www.pembrokeshirecoast.wales/news/your-views-on-our-new-well-being-objectives/>) are highlighted in the Plan, **they need more detailed explanation and clearer links to the issues identified in the Plan.** It's currently very hard to follow the thread between the issues, objectives and outcomes.
- Limited citizen engagement in setting the vision for the National Park. No evidence of public meetings, citizens assemblies or much in the way of deliberative democracy to ensure that a breadth of voices are heard.
- There is no clear statement as to why the Park is of national importance or the risks it faces. This should be the starting point of the plan setting out a vision for the future.

2) No established 'partnership' for the preparation or delivery of the Plan

- **The Plan fails to define who the "partnership" is,** what its function would be and how it would operate. This is the first time that a Partnership Plan has been created for Pembrokeshire Coast National

Park, so there is a need for a more clearly defined partnership group and terms of reference. Cynllun Eryri is a good case study in Eryri. A partnership group has been established to aid delivery and its function is fully outlined in the Partnership Plan.

<https://snowdonia.gov.wales/wp-content/uploads/2020/09/Cynllun-Eryri-English-ER.pdf>

- **There has been no obvious co-design of the plan**, or any evidence of partnership work in the design phase beyond the mention of “ongoing conversations with partner organisations and stakeholders” and an expectation that “Partners will be encouraged to adopt the Plan, sign up to the impacts relevant to them, and to share and celebrate those contributions.”
- It is our view that the Plan should be prepared by, signed up to and delivered by partners but this is not currently the case with Partners being asked to sign on to “example actions”. We do not believe that **key stakeholders identified in the plan (e.g Wildlife Trust, National Trust, Welsh Water, local landowners) have been sufficiently engaged in the design of the themes, policies or proposed outcomes**. Only Cadw and NRW were consulted on the scoping report as the two statutory consultees.
- **No ‘partnership group’ or delivery mechanism has been identified**. The plan lists on pg 8 “partners who can support plan delivery” without defining how they would be expected to engage and deliver as part of a partnership group. The consultation instead asks “would you like to be involved in the delivery of the partnership plan” without any opportunity up until this point to feed into the Plan’s design. As an iterative plan we would expect that this group is established as soon as possible with a clear terms of reference outlined in the Partnership Plan.

3) The State of the Park report is insufficient and limited in scope

- **The State of the Park section of the report is inadequate** and fails to articulate the full extent of the problems and opportunities within the park.
- The plan fails to lay out what the state of the landscape and seascape of the Park actually is. How has the landscape changed over time? And if it has, how? There doesn't appear to be a mechanism for establishing or referencing an existing baseline and subsequently it is difficult to see how change is to be measured.
- **No risk register is established in the Plan.** For example, how will climate change affect the National Park over the next 5,10, 50 years? Which areas of the park are under threat? Newgale, temperate rainforest, Preselies, specific wildlife species? If the risk and opportunities are clearly understood and outlined, priorities can then be set.
- **Lack of an appreciation of the landscape/seascape in the broadest sense and the multifunctional uses they represent.**
- **The State of the Park section of the report needs more baseline detail on a range of topics,** including the impact of farming, tourism and the link between the marine environment and land. The socio-economic factors are also limited in focus.
- The SotP report could be a separate document with key findings drawn back into the Plan so that there is space to explore these topics in more detail. The SotP report should also be repeatable every five years.
- **The availability of data to properly establish the health of the National Park is severely lacking, but it is not acknowledged as**

an issue in the SotP section. Our National Park [Health Check](#) report from April this year highlights the lack of data available in Pembrokeshire and across the National Parks with the need for statutory bodies and the National Park Authority to make greater efforts to collect more data. This is principally explained on pages 18,19 and 29 but also throughout the document. We would like to see an action plan outlining an approach to improving data collection within the National Park.

- **Limited baselining of species or habitat health** makes targets or measurements of successful outcomes impossible.
- **Interactive geographical mapping is helpful in the supporting documentation, but it needs to be linked into the Partnership Plan more clearly.** The plan needs to have a spatial dimension which references the mapping and identifies/confirms hotspots for action.

4) Targets, monitoring and evaluation

- **The plan does not include a review of the successes and failures of the last plan** giving us very little idea of how successful the last Plan was in delivering the objectives or how this draft should be judged against it. It is our view that this new plan needs to give a clearer understanding of why changes to the Management Plan were deemed to be necessary.
- **Timebound SMART targets and milestone are needed which link to 2030/2050 national and international targets such as 30x30.** The key outcomes for 2030 are currently not well outlined or measurable. The issues identified in the Plan include: 'Promoting ecosystem recovery at scale (as a milestone to clear recovery by 2050)' but this remains vague, and the policies and example actions fail to determine what this milestone looks like and under what timeframe.

- Our [Health Check](#) report showed that **Pembrokeshire Coast's existing Management Plan was one of three in England and Wales which failed to set specific time-bound targets** and was explicit in its reasons for doing so. No clear explanation is provided in this Plan as to why timebound targets haven't been set in this plan.
- **The impact monitoring annex is the only indication of how measures will be taken against policies, but these also remain largely vague** without timelines and no idea of how this monitoring will be reported back or summarised to assess the effectiveness of the Management Plan and progress made. The [Yorkshire Dales](#) in comparison clearly set out their objectives with an annual report and interactive public record of how they are performing on each item.
- **Why are there only 'examples of actions' under each policy heading?** Where are the relevant delivery plans linked to them? There is limited demonstration of the work already underway and minimal mention of pipeline projects or the status of existing plans (flood risk plan being one example). This makes it hard to assess the successes of the Park and also whether the scale of the challenge is being met by existing and future project.
- **There seems to be no mention of the need for more detailed spatial management plans** for particular areas of the Park or activities/projects which impact the National Park (e.g for recreation activity or nature recovery or exactly where tree planting should be encouraged).
- **It's not clear whether the suggested partners have been consulted** on the 'example actions' proposed in the document and whether they are fully signed up, resourced and cable of delivering each of the actions.

- **Monitoring and evaluation needs partnership work and there is no sign of how these example actions or policies will be monitored with any measurements of success.** [Eryri's annual monitoring report](#) clearly identifies where progress is being made and what is considered success for each action.

Best Practice Case Studies

[Yorkshire Dales](#) - Evidence of partnership steering group, timebound targets and a monitoring approach.

[Bannau Brycheiniog](#) - An example of strategic vision setting and long-term thinking. Also deliberative democracy techniques were used such as citizens assemblies and policy workshops to determine and agree actions.

[Eryri](#) - A good example of Partnership working and how to prepare a partnership group.

[Exmoor](#) - Use Nature Recovery vision document as an example of clearly laid out approach to nature recovery actions.

[Broads](#) - Although dated this biodiversity audit demonstrates the detailed baselining for nature that'd possible in National Parks.

[The New Forest State of the Park report](#) sits outside of the Management plan and clearly outlines headline indicators and trends.

CONSULTATION QUESTION ANSWERS

Section 1: A living, working landscape

What do you think about basing the Plan on the four themes of Conservation, Connection, Climate and natural resources, and Community?

- This is a Partnership Plan for the National Park rather than a Plan for the National Park Authority alone, so whilst it is understandable that the themes of the Partnership Plan are aligned to the NPA's well-being objectives and Corporate Plan, it is reasonable to question whether these themes are the most appropriate for the Partnership Plan as a whole. Especially when it is unclear how thoroughly the suitability of these themes were consulted on with partners in the drafting of the Plan.
- Significant landowners in the National Park (National Trust, Ministry of Defence for example) are highlighted in the report but there is no evidence in the Plan or supporting documentation that their input has been sought in the development/use of the themes, outcomes or policies contained within the Plan.
- If these themes are to be useful they should be set within a long-term vision for the Park so that there is longevity to the themes extending beyond the next plan period. Y Bannau (Bannau Brycheiniog's Management Plan) establishes a VMOSA style approach (vision, mission, objectives, strategies, action) over a 25-year mid-term vision and 50-year long term change period. In our view the Plan does a better job of clearly articulating missions for the National Park, rationalising them with relatable outcomes and linking them to the Wellbeing of Future Generations Act over the long-term.
- Key issues and objectives highlighted within the scoping report do not appear to be reflected in the partnership plan's listed key issues. The identified issues also fail to include a risk rating or any sort of prioritisation. It is pleasing to see that nature is featured at the top of the list of issues to tackle, but this bulleted list does not make it clear which are being prioritised or why.

Section 2: Special qualities of the National Park

Have we captured all the special qualities of the National Park?

- The special qualities section of the Plan fails to place the Pembrokeshire Coast National Park in its wider National and International context. For example, how do the special qualities contribute to global targets and commitments?
- The section also fails to adequately highlight present risks or opportunities for each of the special qualities identified.
- There is no clear statement explaining why the Park is of national importance and how it contributes to a larger whole. This should be the starting point of the plan in order to set out a vision for the future.

Section 3: The State of the Park – challenges and opportunities

Have we accurately captured the State of the Park, and the main challenges and opportunities? Is there other evidence that would add value to the assessment?

- The State of the Park section of the report is inadequate and fails to articulate the full extent of the challenges, risks and opportunities within the Park. Without investment in a comprehensive stand-alone State of the Park report which is repeatable, able to provide baseline information and demonstrate change over time, the design, prioritisation and delivery of actions and targets is much more difficult.
- The section fails to adequately lay out what the actual state of the landscape and seascape is in the Park. How has the landscape changed over time, and if it has, how? What are the projections for 2050. Whilst the interactive mapping is helpful it needs to be more detailed and clearly referenced in the Plan to identify the areas of risk and focus. There doesn't appear to be a mechanism for setting a baseline or measuring change more generally.
- This section of the Partnership Plan is far too generalised, surface level and with large gaps in analysis across a range of topics. For example there is no analysis of SSSI health and their reasons for failure. There is also limited species analysis and no mention of agricultural environment schemes (it's

importance and take up in the National Park) or significant analysis of tourism impacts, flooding or recreational disturbance issues.

- The amount of available baseline data is extremely limited within the Plan, but it is also not acknowledged as a major limiting factor which needs addressing through a monitoring framework and additional resources. Campaign for National Park's Health Check report from April this year highlights the lack of data available in Pembrokeshire Coast and the need for statutory bodies and the National Park Authority to make greater efforts to collect more data. This is principally explained on pages 18,19 and 29 of the report.
- There is also no risk register aligned with the State of the Park report. Which areas of the park are most under threat and to what extent are certain species at risk? If the risks and opportunities within the Park are clearly understood, priorities can then be set, but the plan currently fails to clearly articulate or grade the likelihood or consequence of inaction. The New Forest State of the Park report sits outside of the Management plan and clearly outlines headline indicators and trends.

Section 4: Conservation

What comments do you have on the proposed policies, actions and partnerships for Conservation?

NB: please complete this section with specific responses to individual policies if necessary. Below are general comments on this section.

- This section currently reads as a wishlist of changes rather than a plan for change. The current corporate resources plan has more ambitious targets, but these aren't always clearly reflected in the Plan.
- The outcomes and example actions in this section are not SMART and have no clear time-bound targets. The outcomes are not specific enough and the section fails to provide evidence of listed partners being consulted on the

outcomes or how they would be expected to help deliver them through the example actions or existing or future projects.

- The impact monitoring annex is the only indication of how measures will be taken against policies but these also remain largely vague without timelines and no idea of how this monitoring will be reported on and brought together to assess the effectiveness of the Management Plan. The Yorkshire Dales in comparison clearly set out their objectives with a record of how they are performing.
- It is unclear why ‘example actions’ are used and which of these actions will be enacted by when.
- The example action: “deliver practical conservation land management projects to deliver biodiversity benefits” fails to highlight exactly which projects (existing or otherwise) would be expected to deliver the related outcome or what would be considered a success after 5 years.
- The actions do not appear to be explicitly linked to Welsh Government, UK or international targets.
- It would be beneficial to draw out case studies of actions, projects or strategies already underway in the Park. How are they performing? What are their timeframes? How are they contributing to the expected outcomes?
- No clear articulation of a nature recovery strategy or Local Nature Recovery Action Plan (LNRAP) in place for the area.
- No monitoring metrics outlined to show how progress will be reported or who will be responsible?
- No actions focused on improving data capture (species and habitat health) or efforts to work with partners to establish an improved monitoring regime in the park.

Section 5: Connection

What comments do you have on the proposed policies, actions and partnerships for Connection?

- Similarly to Conservation, this section currently reads as a wishlist of changes rather than a plan for change.
- The outcomes and example actions in this section are also not SMART and have no clear time-bound targets. The outcomes are not specific enough and the section fails to provide evidence of listed partners being consulted on the outcomes and how they would be expected to help deliver them through the example actions.
- Similarly the monitoring and impact framework needs to be more robust and clear how reporting will take place and when.
- The example action: “Deliver nature based social prescribing” (W2/B) is another example of an outlined ambition with no SMART targets or key deliverables, partners or projects identified to deliver the change.

Section 6: Climate and natural resources

What comments do you have on the proposed policies, actions and partnerships for Climate and natural resources?

- As with the above sections, although the example actions are admirable, how they will be delivered through partnership working is left unclear. Without SMART targets or an outline of how the listed partners will be brought together to deliver the example actions makes the policy asks vague and undeliverable.
- For example “Deliver Net Zero Wales” (N1/A) is not place-specific to Pembrokeshire Coast and fails to identify when or how an action plan to deliver this action of being carbon neutral by 2048 will be achieved. Policies

already in place or policies which need to be developed need to be highlighted here. At what stage is this action already underway?

Section 7: Communities

What comments do you have on the proposed policies, actions and partnerships for Communities?

- As with the above sections, although the example actions are admirable, how they will be delivered through partnership working is left unclear. Without SMART targets or an outline of how the listed partners will be brought together to deliver the example actions makes the policy asks vague and undeliverable.
- It's pleasing to see a regenerative tourism focus, but again the policy is unspecified as to what forum will develop this plan and over what timeframe. Again impact monitoring needs to be made much clearer throughout this section.

Next steps

Would you like to be involved in delivery of the Partnership Plan? If so, how?

We do not wish to be involved in the delivery of the Partnership Plan but would like to see a Partnership delivery group established to direct the work programme.

What comments do you have on the initial Equality impact assessment? This identified some of the following important areas that the Plan needs to consider, including:

- The accessibility of the consultation documents
- The range of partners included and potential gaps
- Removing barriers and widening access to support people to experience and benefit from the special qualities of the National Park
- Creating a welcoming Park for everyone
- Access to toilets and changing place facilities
- Health benefits from accessing the outdoors and connecting with nature
- Responding to issues about water quality and impacts of pollution on public health
- Water safety, particularly for young people
- Affordable housing and interventions to help support affordable housing provision in the National Park
- Transport challenges and affordability and access to services
- Pathways to employment, particularly for young people or people facing barriers to accessing employment opportunities
- Issues around low wages, seasonality, in-work poverty and access to fair work
- Representation in arts and heritage opportunities and protection of religious sites of importance

Is there anything linked to the above areas we could change in the Plan to improve outcomes for protected groups (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation), people experiencing socio-economic disadvantage and people's health outcomes?

- More opportunities to engage in the delivery of the plan need to be made available through deliberative democracy tools such as citizens' or peoples assemblies in order to regularly engage with a broader cross section of local people who may not otherwise engage in the Management Plan.
- The wellbeing assessment is honest and should be more closely integrated into the Partnership Plan's actions.

- We remain concerned by the lack of engagement in the Partnership Plan a reliance on existing structures of democratic engagement are clearly not allowing deeper and more meaningful engagement in the Plan and its design.
- We are concerned by the budget attributed to the development of the Plan and this therefore has a significant impact on the ability of the plan to break through boundaries and involve more people through citizen engagement events.

What comments do you have on the findings of the Habitats Regulations Assessment?

We do not have sufficient expertise in this area to provide detailed feedback on the habitats regulations assessment, however, we have noted that some of the policies are outlined as being “general” or vague”.

What comments do you have on the findings of the Sustainability Appraisal / Strategic Environmental Assessment?

The other plans listed within this assessment which this Partnership Plan is reliant upon is important and should be reflected upon in much more detail within the actual Partnership Plan; including reference to progress and successes made so far. Without this it is unclear how these plans are affecting change already.

What comments do you have on the initial Welsh language impact assessment? This identified some of the following important areas that the Plan needs to consider, including:

- Greater recognition of the Welsh language dialect in Pembrokeshire and Welsh language use in communities within the north of the National Park where there is currently, and traditionally, strong Welsh language use
- Additions to complete the policy and legislative framework linked to Welsh language

- Additions to complete the range of partners that could support delivery of policies and results linked to Welsh language, e.g. those linked to well-being
- Ensuring that children accessing Welsh medium education or being supported through language centres (from within and outside Pembrokeshire) are able to access opportunities to learn about the National Park in Welsh
- Additions to partnership working to promote and develop existing opportunities to learn Welsh in Pembrokeshire
- Ensuring Welsh language is integrated when developing regenerative tourism approaches, e.g. raising awareness of the significance of Welsh language and promoting it to visitors
- Ensuring that Welsh language speakers and learners can access information in Welsh while also raising the visibility of language to non Welsh speakers / visitors
- Additional recommendations for partnership effort to conserve historical geographical names
- Additional recommendations for partnership effort to support an appropriate range of fair work opportunities, reflecting the importance of a strong economy as well as a sufficient supply of affordable homes in enabling vibrant communities where the Welsh language can thrive
- Comments regarding training and job opportunities arising from conservation and climate objectives - e.g. the role regenerative farming role could play for the next generation of farmers within Welsh-speaking communities - and more generally supporting a wide range of people to participate in taking action for nature

We support all efforts to encourage wider use of the Welsh Language within the National Park. We believe that the Management Plan has an important part to play in integrating the Welsh language and protecting its heritage.