



**Cyfoeth  
Naturiol  
Cymru  
Natural  
Resources  
Wales**

Ein cyf/Our ref: MY/ke  
Eich cyf/Your ref:

Maes Newydd / Maes Newydd  
Llandarsi / Llandarcy  
Castell-Nedd Port Talbot / Neath Port Talbot  
SA10 6JQ / SA10 6JQ

Ebost/Email:  
[mary.youell@cyfoethnaturiolcymru.gov.uk](mailto:mary.youell@cyfoethnaturiolcymru.gov.uk)  
[mary.youell@naturalresourceswales.gov.uk](mailto:mary.youell@naturalresourceswales.gov.uk)

Ffôn/Phone : 01792 32 5555

Management Plan Consultation  
Park Direction  
Pembrokeshire Coast National Park Authority  
Llanion Park  
Llanion  
Pembroke dock  
Pembrokeshire  
SA72 6DY

31 Hydref/October 2014

Annwyl / Dear Sir/Madam,

**NATIONAL PARK MANAGEMENT PLAN 2015 – 2019 CONSULTATION DRAFT, INCORPORATING HABITATS REGULATIONS ASSESSMENT (HRA) AND STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA).**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales on the above.

*Natural Resources Wales brings together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of Welsh Government. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.*

Natural Resources Wales (NRW) agree with the conclusions of the HRA/SEA in that there is unlikely to be any significant effect on the integrity of Natura 2000 sites as a result of implementing this plan.

We welcome the work that has been undertaken to date by the authority to produce what will be an effective and useful Management Plan which I am pleased to endorse. I hope you will find our specific comments and advice, prepared by Chris Lawrence, useful for the clarification and enhancement of the plan. They are as follows:

## Specific points

1. We note the shift towards adopting an Ecosystem Approach, however we recommend further action in line with the advice report 'Ecosystem Approach for Protected Landscapes Management Plan Reviews' March 2014. See 6.7 to 6.14, pages 24 and 25 in particular with regard to mapping ecosystem services and their benefits. This could improve the overall integration of the management of these services and assist in prioritisation.
2. Further work reflecting the Ecosystem Approach has been undertaken but is not adequately reflected in the table in annex 2. Perhaps this could be replaced by an additional paragraph in the introduction explaining the integration of the new approach throughout the Plan?
3. There is a need to present robust evidence and data which demonstrates longer term trends to support policies. We note that some evidence / data is presented at the start of some chapters, but others are missing e.g. Rights of Way open and usable (Discovering and Enjoying the NP).
4. Despite the explanation in 3.1.3 there remains a need for Objectives, ideally which are SMART. Outcome and factor measures should be clearly included as they are mentioned in 3.1.3
5. In line with the Ecosystem Approach, a greater emphasis could be placed on stakeholder engagement in developing sustainable solutions to the many challenges facing the PCNPA.
6. We are pleased to see that the contribution that landscape can make to people's wellbeing has been highlighted on numerous occasions.
7. The tables in sections 5.2.4.3 -5 do not use the latest information. This data will be subject to constant change throughout the life of the plan. NRW would hope that the % of features classified as favourable / units under appropriate conservation management would be significantly higher by the end of this plan's timeframe. Nevertheless, this does show that some of our most sensitive, wildlife rich sites are under significant environmental pressure and are at risk of failing to meet their conservation objectives. These designated sites represent areas that are amongst the best examples of habitats, species, geology and geomorphology in the UK.
8. In line with the ecosystems Approach, it is important to use plain non-technical language. The table's referred to above use the terms features, units, favourable, etc and these may not be readily understood. A further explanation would be useful. Consideration could also be given to representing the data visually in a chart of some form.

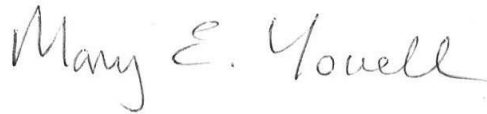
9. The information presented on the maps (page 33&35) to represent the coverage of SAC's and also NNR's could be made clearer by better use of colour. The map representing SSSI is much easier to interpret.
10. Section 7: Earth Heritage. Better use of colour on the map identifying the GCR sites is recommended.
11. Table 7.2.1.3, as before, an explanation of what a 'feature' is in line with the recommendations for the use of plain English under the Ecosystems Approach.
12. Coastal GCR sites can come under pressure from schemes to stabilise cliffs and other coastal protection schemes (7.3.2.3). In efforts to stabilise the coast and reduce the risk of erosion the geological features of interest can become obscured and no longer accessible. Such schemes should be preceded by comprehensive scientific recording of the features at risk.
13. Section 8: Protecting Air and Water. Air quality baseline Critical Loads are currently in exceedence at some of our most sensitive sites. This will have a negative impact on particularly sensitive receptors such as lichens. With stakeholder participation it may be possible to implement local management schemes to mitigate for the effects of elevated aerial pollutants.
14. The Eastern Cleddau surface water resource is currently described as over licensed – this is subject to an ongoing Review of Consents process to determine a suitable level of abstraction.
15. Designated Bathing Water Standards (8.2.4) There are now 29 beaches monitored by NRW. Up to date information will be available from NRW.
16. Water Pollution (8.3.3) It is our understanding that a new sewer at Wiseman's bridge will not be installed.
17. Diffuse and point source pollution. The Milford Haven Waterway is at risk of failing to meet its conservation objectives due to elevated nutrient levels. The main significant source of these nutrients has been identified as the catchments of the Eastern and Western Cleddau and as such these catchments are on 'amber alert' as a potential Nitrate Vulnerable Zone.
18. Policy AW1, point 3. If reduction of emission is not viable, consideration could be given to local mitigation.

In summary, NRW welcome the production of this Draft Pembrokeshire Coast National Park Management Plan incorporating Habitats Regulations Assessment (HRA) / Strategic

Environmental Assessment (SEA) and look forward to working in partnership to assist the PCNPA in achieving the aims outlined within the document.

As always, if you require any further information or clarification of the above, please do not hesitate to contact us via Chris Lawrence, using the contact details at the top of this letter.

Yours faithfully,

A handwritten signature in black ink that reads "Mary E. Youell". The signature is written in a cursive style with a clear, legible font.

**Mary Youell**

Operations Manager South West Wales  
Rheolwr Gweithrediadau De-orllewin Cymru