

REPORT OF THE MANAGEMENT PLAN AND MARINE POLICY OFFICER

SUBJECT: NATIONAL PARK MANAGEMENT PLAN 2025 - 2029

Purpose of the report

1. This report seeks Members' input to and approval for an outline programme for review of the National Park Management Plan ("the Management Plan").
2. Review will include formal consultation on a revised Management Plan and associated documents (including statutory impact assessments) prior to formal adoption of a revised Management Plan by the National Park Authority.

Background

3. The National Park Authority is required by the Environment Act 1995 (section 66) to prepare a Management Plan for the National Park. The Environment Act 1995 gives relevant authorities a legal duty to have regard to Park purposes and to the Sandford Principle¹. The current National Park Management Plan covers the period 2020-2024.
4. The Management Plan is a plan for the National Park area, not just for the National Park Authority. As such it is inherently strategic, and should set policy direction which has relevance beyond its formal five-year term. For the same reason, an iterative approach to Management Plan review (where learning from the current term informs its successor) is indicated.
5. The Well-being of Future Generations (Wales) Act 2015 and The Environment (Wales) Act 2016 add statutory backing to National Park purposes and to the need for participation and collaboration to achieve them. Similarly, the Authority is required to collaborate with partners in the delivery of local well-being objectives and relevant Area Statements. Specifically the Management Plan should align with the South West Area Statement and the Marine Area Statement, complement the priorities and project plans contained in the Well-being Plan for Pembrokeshire 2023-2028, and embed the five ways of working set out in the Well-being of Future Generations (Wales) Act 2015.
6. Management Plan review will need to take account of new evidence, policy and legislative revisions, and trends in opportunities and challenges affecting the National Park. It is suggested that, initially, a public engagement exercise on special qualities of the National Park is carried out. This will provide an early engagement opportunity and steer for the Management Plan review, and enable the draft Management Plan to include a contemporary statement of the National Park's significance.

¹ If there is a conflict between the purposes that cannot be resolved, the first purpose has greater weight.

7. To aid effectiveness and efficiency, it is proposed that existing stakeholder partnerships are involved in the Management Plan review process where possible. This will also enable relatively more resources to be allocated to seldom heard individuals and groups, and to topic areas not currently served by partnerships.
8. Online techniques and awareness, accelerated by the pandemic, afford new ways to engage with our audiences, including audiences who are seldom heard. As part of the engagement process, it is proposed to create an online Management Plan consultation site. This would also facilitate analysis, presentation and our responses to input, and could provide a means of keeping conversations going during Management Plan implementation.

Guidance on Management Plans

9. The current guidance on National Park Management Plans was published in 2007. There have been two supplements to this guidance. The first (in 2014) provided advice on ecosystem conservation in protected landscape management. In May 2018, an informal update note on management planning was provided by Natural Resources Wales. The note set protected landscape management plans at the heart of nature-based and place-based solutions, and recognised the significant contribution they should make to resilience and natural resource management objectives at wider scales.
10. A further update from Natural Resources Wales on the role of protected landscapes in addressing climate and nature emergencies was anticipated in 2023. It seems likely that this will be subsumed within a wider review of the Management Plan guidance which Natural Resources Wales is commissioning. Officers will remain in contact with colleagues in Natural Resources Wales as the management plan guidance is reviewed.

Proposed review programme

11. A proposed timetable for review of the Management Plan is given below. Initial discussions have taken place with members of Senior Leadership Team and with Management Team.

Table 1: Proposed review programme

Ref.	Milestone	When	Resourcing
1	Collate review evidence and align current content with Delivery Plans.	Ongoing	Strategic Policy Team
2	Obtain Authority approval for timeline and approach.	20th Dec 2023	Strategic Policy Team
3	Notify statutory bodies of intent to review (legal requirement).	January 2024	Strategic Policy Team
4	Engage with stakeholders on the National Park's special qualities.	January – March 2024	• Strategic Policy Team

Ref.	Milestone	When	Resourcing
			<ul style="list-style-type: none"> • Delivery Plan leads
5	<p>Convene Focus Group and / or Member Workshops to discuss draft reports and assessments. Possible topics, led by heads of department, include:</p> <ul style="list-style-type: none"> • Nature Recovery (including marine) • Climate Adaptation (including coastal change) • Communities • Equalities/Inclusion • Decarbonisation <p>Engagement can also afford a way of engaging with people on the Authority's Delivery Plans.</p>	<p>January – April 2024</p> <ul style="list-style-type: none"> • Available in NPA calendar: 10am Wed 17th Jan 2024 and 10am Wed 17th April 2024 • other dates as necessary <p><i>Note – there is tightness in the schedule in spring 2024 as the various impact assessments necessarily follow policy drafting which is contingent on Focus Groups etc. The Sustainability Appraisal Scoping Report requires a 5-week consultation period prior to Sustainability Appraisal; this is only required if major (policy) modifications are proposed.</i></p>	<ul style="list-style-type: none"> • Delivery Plan leads • Performance and Compliance Co-ordinator • External consultants (shadow Habitats Regulations Assessment)
6	<p>Obtain Authority approval of consultation draft content:</p> <ul style="list-style-type: none"> • National Park Management Plan • Equality Impact Assessment (including consideration of socio-economic duty impacts², and, if required, of health impacts) • Habitats Regulations Assessment 	<p>National Park Authority May 2024</p>	<ul style="list-style-type: none"> • Strategic Policy Team • Performance and Compliance Co-ordinator • Delivery Plan leads • Easy-Read content (external) • Translation (external)

² In the context of the Equality Act this duty relates to reducing the inequalities of outcome which result from socio-economic disadvantage. It is appropriate therefore to incorporate it into the Equality Impact Assessment.

Ref.	Milestone	When	Resourcing
	<ul style="list-style-type: none"> Sustainability Appraisal / Strategic Environmental Assessment³ Welsh Language Assessment <p><i>Note: the Management Plan will also be assessed against the seven well-being goals for Wales and five ways of working under the Well-being of Future Generations (Wales) Act (2015), to ensure that all classes of potential impact have been identified.</i></p>		
7	Undertake public consultation (12 weeks), via, for example: <ul style="list-style-type: none"> engagement website: evidence, policies, impacts, mapping etc online drop-ins/fora questionnaires County Show 	Mid-June - mid-September 2024 <i>Note: ensure time for time for creation of Privacy Notice and potentially a Data Protection Impact Assessment.</i>	<ul style="list-style-type: none"> Strategic Policy Team Communications Team Delivery Plan leads
8	Present report of consultations to Authority. Obtain Authority comment on and approval of proposed amendments.	National Park Authority October 2024	<ul style="list-style-type: none"> Delivery Plan leads Strategic Policy Team
9	Revise documents in line with 7.	October / November 2024	<ul style="list-style-type: none"> Strategic Policy Team Performance and Compliance Co-ordinator Translation of amendments (external) Easy-Read amendments (external) Shadow Habitats Regulations Assessment - check against amendments (external)

³ To include the Biodiversity and Resilience of Ecosystems Duty (“the Section 6 duty”) set out in the Environment (Wales) Act 2016, and decarbonisation.

Ref.	Milestone	When	Resourcing
10	Publish approved Management Plan content and assessments (online); report of consultation, feedback to consultees, formal notification / adoption statements.	November / December 2025	Strategic Policy Team

Impact assessments

12. The Management Plan is subject to a set of individual assessments (as opposed to an integrated assessment), which are cross-referenced to identify any potential conflicts between them. The approach responds to concerns that have been highlighted by Welsh Language Commissioner and Audit Wales in relation to incorporation of Welsh Language Assessments and Equality Impact Assessments into Integrated Assessments. (See also the section on Welsh Language Assessment at paragraph 18 of this report.) The Authority is currently undertaking a review of its approach to integrated assessments.
13. The Well-being of Future Generations (Wales) Act (2015) defines sustainable development as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. The Management Plan will be assessed against the seven well-being goals for Wales and five ways of working under the Act.

Equality Impact Assessment

14. The Management Plan is subject to Equality Impact Assessment, as required by the Equality Act 2010. In the formative stages of policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010, that is, people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief. The public equality duty requires the National Park Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. (There is a complementary link here to the planned review in 2024 of the Authority's Equality Plan.)
15. Welsh Ministers implemented the socio-economic duty (sections 1 to 3 of the Equality Act 2010) in Wales in March 2021. The socio-economic duty requires public bodies in Wales, when making decisions of a strategic nature about how to exercise their functions, to have due regard to exercising them so as to reduce the inequalities of outcome which result from socio-economic disadvantage. Socio-economic duty impacts will be considered as part of the Equality Impact Assessment and will enhance this assessment through considerations linked to intersectionality (how multiple dimensions and systems of inequality interact with one another and create distinct experiences and outcomes), and socio-economic disadvantage.

Habitats Regulations Assessment

16. The National Park Authority is a competent authority under the Conservation of Habitats and Species Regulations 2017⁴ (“the Habitats Regulations”). In accordance with Regulation 63, the Management Plan must be assessed for likely significant effects on the UK National Site Network (Special Areas of Conservation and Special Protection Areas), and Ramsar sites. The assessment is referred to as a Habitats Regulations Assessment and the regulations set out a clearly defined step-wise process which must be followed.

Sustainability Appraisal and Strategic Environmental Assessment

17. Sustainability Appraisal assesses the environmental, social and economic implications of the Management Plan’s strategies and policies. Strategic Environmental Assessment requires the formal assessment of certain plans and programmes that are likely to have significant effects on the environment⁵. The requirements of both can be met in a single appraisal.

Welsh Language Assessment

18. Review of the Management Plan will be carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015. The Authority must make a *conscientious effort*⁶ to consider specific possible impacts of policy on the Welsh language, via a Welsh Language Assessment. (There is a complementary link here to the review of the National Park Authority’s Welsh Language Strategy.)

Data acquisition and management

19. Contact data acquisition and retention must take place in accord with the General Data Protection Regulation, transposed into UK law by the Data Protection Act 2018.

Resource considerations

20. General resource requirements are identified in the right-hand column of the table above. The shadow Habitats Regulations Assessment, Easy Read document versions and translation into Welsh are commissioned externally. There is a budget of £3,000 for Management Plan preparation.

Human Rights considerations

21. The Management Plan will ensure compatibility with the Human Rights Act 1998 where there is a need to reconcile differing demands. The preparation and assessment procedures proposed above support this requirement.

⁴ The Conservation of Habitats and Species Regulations 2017.

⁵ EU Directive 2001/42/EC (“the SEA Directive”) as transposed into Welsh law through The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.

⁶ Neath Port Talbot County Borough Council vs. Welsh Language Commissioner.

Recommendation

That, subject to any amendments requested by Members, the proposed approach, milestones and timeline for preparation of the National Park Management Plan 2025–2029 are agreed.

Background documents

Welsh Assembly Government / Countryside Council for Wales 2007 [National Park Management Plans Guidance](#)

(For further information please contact Michel Regelous, National Park and Marine Policy Officer, extension 4827.)

Consultees: Senior Leadership Team, Head of Strategic Policy, Research and Sustainability Appraisal Officer, Performance and Compliance Co-ordinator.