

Sustainability Appraisal Adoption Statement for the Brecon Beacons National Park Management Plan 2010 – 2015

# Brecon Beacons National Park

# Sustainability Appraisal Adoption Statement

for the National Park Management Plan 2010-2015

© Brecon Beacons National Park Authority 2010

This document is also available electronically via the Planning section of our web site at <a href="http://www.breconbeacons.org/content/the-authority/planning/strategy-and-policy/npmp">http://www.breconbeacons.org/content/the-authority/planning/strategy-and-policy/npmp</a>

# **Contents**

| ١. | ntroduction  | ∠  |
|----|--|----|
| 2. | Sustainability and Environmental Considerations  | 4  |
|    | II. National Park Management Plan Framework  | 4  |
|    | Sustainability and Environmental Considerations in the National Park Management Plan     |    |
|    | How the Sustainability Appraisal Report has been Taken into Account                      |    |
|    | Consultation   |    |
|    | I. National Park Management Plan   |    |
|    | -2. SA/SEA   |    |
|    | Changes to the National Park Management Plan   |    |
| 6. | Reasons for Choosing the Plan as Adopted   | 19 |
| 7. | Monitoring   | 20 |
|    | nex I: Evaluation of NPMP actions added or altered significantly as a result of the last |    |
|    | sultation  | 24 |

## I. Introduction

The Brecon Beacons National Park Management Plan (NPMP) is subject to The Environmental Assessment of Plans and Programmes Regulations (2004)<sup>1</sup> which implements European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive. Although the National Park Management Plan is designed to conserve and enhance the Park's environment, it has the potential to produce significant environmental effects. The main purpose of SEA is to improve the environmental performance of a plan by assessing whether it is likely to result in any significant environmental effects (positive or negative). Recommendations as to how adverse effects can be avoided, offset or reduced, as well as how improvements can be made, should be suggested. A programme to monitor significant effects is required in order to check whether the SEA has been accurate in its predictions.

To demonstrate adherence to sustainable development principles and maintain consistency with the Brecon Beacons National Park Local Development Plan (LDP), which requires Sustainability Appraisal (SA) under other legislation, SA has also been undertaken for the National Park Management Plan. It is possible to satisfy the requirements of both pieces of legislation through a single assessment process. Welsh Assembly Government guidance<sup>2</sup> details how the SA and SEA should be integrated into one process. This guidance has been considered in carrying out both SA and SEA on the National Park Management Plan. The results of these two assessment processes were combined and published in a single Sustainability Appraisal Report, fulfilling the requirements of an SEA Environmental Report.

The SEA Regulations require that a "statement" be made available to accompany the adopted plan or programme. This statement must contain information on:

- How sustainability and environmental considerations have been integrated into the plan or programme;
- How the Sustainability Appraisal Report has been taken into account;
- How opinions expressed in relation to the consultations on the plan/ programme and Sustainability Appraisal Report have been taken into account;
- Reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

This document provides the aforementioned information and acts as the SA/SEA adoption "statement" for the Brecon Beacons National Park Management Plan. In so doing, it fulfils the requirements of the SEA Regulations and SA Guidance.

# 2. Sustainability and Environmental Considerations

# 2.1. National Park Management Plan Framework

National Parks were designated under the 1949 National Parks and Access to the Countryside Act. Their current framework is the Environment Act 1995 which sets out their two purposes:

• Conservation and enhancement - "to conserve and enhance the natural beauty, wildlife, and cultural heritage of the National Parks"

<sup>&</sup>lt;sup>1</sup> Environmental Assessment of Plans and Programmes (Wales) Regulations (2004).

<sup>&</sup>lt;sup>2</sup> WAG Local Development Plan Manual, 2006.

• Understanding and enjoyment - "to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public."

These are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of irreconcilable conflict.

The National Park Authority (NPA), in pursuit of the two statutory purposes, also has a statutory duty to:

"...seek to foster the economic and social well-being of local communities (within the National Park by working closely with the agencies and local authorities responsible for these matters)."

The National Park Management Plan (NPMP) is the principal vehicle for ensuring that the statutory provisions of the Act are met. The central role of the Management Plan, then, is to guide the delivery of the statutory purposes and duty, assisted by the NPA's statutory planning function.

The NPA leads the actions and facilitates the partnerships required to fulfil the Park's purposes and duty – including preparation of the National Park Management Plan – with the aim to foster a collective sense of purpose among those with a vested interest in the Park.

Sustainability and environmental stewardship are, therefore, principles requisite to the pursuit of the statutory purposes and duty, management of the National Park and, consequently, delivery of National Park Management Plan strategies. The Plan sets a vision for the future of the Park, outlines aims and strategic objectives, and specifies actions and outcomes to pursue in the next five years to bring the Park closer to its shared vision. The SA/SEA processes have ensured that sustainability and environmental considerations have been integrated into all stages of Management Plan development.

# 2.2. Sustainability and Environmental Considerations in the National Park Management Plan

SEA Regulations require that the following topics are investigated: air; biodiversity; climatic factors; cultural heritage; human health; landscape; material assets; population; soil; water; and the interrelationship between these factors. The Sustainability Appraisal element of the process widens this to include consideration of social and economic issues.

Table 2.1 identifies the relevant SA/SEA topics and existing trends and issues for each topic relevant to National Park management. These items were compiled early in the scoping and baseline data collection stages of the SEA process and updated during subsequent stages as required (Sustainability Appraisal Report, Table 5.2). To illustrate how sustainability and environmental considerations have been integrated into the Management Plan, Table 2.1 also lists sections of the Plan containing strategies relevant to each topic. Many of the SA/SEA topics are recurrent themes throughout the Management Plan. Therefore, reference is made only to those sections of the Plan that include strategies that specifically address the identified topic.

Table 2.1. How sustainability and environmental considerations have been integrated into the Management Plan.

| SA/SEA<br>Topic       | Identified Issues and Trends   | Relevant Plan Strategies                                   |  |  |  |  |
|-----------------------|--|--|--|--|--|--|
| Climate change        | Increase in the risk of flooding.  | 7.1.1 Landscape  |  |  |  |  |
|                       | Development in the floodplain  | 7.1.2 Biodiversity   |  |  |  |  |
|                       | Increase in the risk of drought.   | 7.1.8 Water Resources                                      |  |  |  |  |
|                       | Increase in the risk of erosion, habitat loss and  | 7.1.9 Soil Resources                                       |  |  |  |  |
|                       | water quality.   | 7.1.12 Farming 7.1.14 Uplands                              |  |  |  |  |
|                       |  | 7.2.1 Outdoor Access and Recreation                        |  |  |  |  |
|                       |  | 7.3.1 Sustainable Communities                              |  |  |  |  |
|                       |  | 7.3.3 Fforest Fawr Geopark                                 |  |  |  |  |
|                       |  | 7.3.4 Planning and Development                             |  |  |  |  |
| Greenhouse gas        | Targets for greenhouse gas emissions are not   | 7.1.7 Air Resources  |  |  |  |  |
| emissions             | being met.   | 7.I.II Energy  |  |  |  |  |
|                       |  | 7.3.1 Sustainable Communities                              |  |  |  |  |
|                       |  | 7.3.2 Sustainable Tourism                                  |  |  |  |  |
|                       |  | 7.3.4 Planning and Development                             |  |  |  |  |
|                       |  | 7.3.5 Transport  |  |  |  |  |
| Air quality           | Main outstanding issue is acid rain (nitrate deposition) originating outside the park.   | 7.1.7 Air Resources  |  |  |  |  |
|                       | . , , , , , , , , , , , , , , , , , , ,  | 7.1.11 Energy  |  |  |  |  |
|                       | Potential issue with ozone levels.   | 7.1.14 Uplands 7.3.1 Sustainable Communities               |  |  |  |  |
| ) A / II              |  |  |  |  |  |  |
| Water quality         | The causes of some waters being biologically and chemically less than 'very good' needs to   | 7.1.2 Biodiversity   |  |  |  |  |
|                       | be addressed.  | 7.1.8 Water Resources 7.1.9 Soil Resources                 |  |  |  |  |
|                       | A large majority of the NP falls within  | 7.1.11 Energy  |  |  |  |  |
|                       | groundwater vulnerability zones.   | 7.1.12 Farming   |  |  |  |  |
|                       | Issues with groundwater contamination from old mineworks.  | 7.1.14 Uplands 7.2.1 Outdoor Access and                    |  |  |  |  |
|                       | Need to improve the water quality at the lower part of Monmouthshire Canal.  | Recreation 7.3.1 Sustainable Communities                   |  |  |  |  |
|                       | Catchment management as the most cost-<br>effective means of conserving water and<br>improving water quality, versus expensive and<br>intrusive water treatment works (new one at<br>Talybont, new one sought in Upper Swansea<br>Valley). | 7.3.4 Planning and Development                             |  |  |  |  |
| Water quantity        | The effects of climate change on the abundance or limitations of water; River Usk is at or close to maximum abstraction capacity.  |  |  |  |  |  |
|                       | Reservoirs run low or empty during prolonged drought.  |  |  |  |  |  |
| Soil and geodiversity | Risk of soil erosion and reduction from grazing animals, walkers and other recreational activities.  | 7.1.2 Biodiversity 7.1.3 Geodiversity 7.1.9 Soil Resources |  |  |  |  |
|                       | NP contains areas of peat and high carbon soils already degraded, compacted and eroded.  | 7.1.10 Minerals 7.1.12 Farming                             |  |  |  |  |

| SA/SEA<br>Topic                                  | Identified Issues and Trends  | Relevant Plan Strategies  |  |  |  |  |  |  |
|--|---|---|--|--|--|--|--|--|
|  | 51% of geological SSSIs in the park are in an unfavourable condition.   | 7.1.14 Uplands 7.2.1 Outdoor Access and Recreation 7.3.3 Fforest Fawr Geopark               |  |  |  |  |  |  |
| Biodiversity                                     | Threats to biodiversity from habitat loss, pollution and the anticipated effects of climate and agricultural change.  | 7.1.2 Biodiversity 7.1.3 Geodiversity 7.1.8 Water Resources 7.1.12 Farming 7.1.13 Woodlands |  |  |  |  |  |  |
|  | Of the 11 SACs in the NP, 9 have features that are in an unfavourable condition.  |   |  |  |  |  |  |  |
|  | 55% of SSSI biological "features of importance" in the NP are in an unfavourable condition. Of those owned/managed by the NPA 77% are in an unfavourable condition.   | 7.1.14 Uplands 7.2.1 Outdoor Access and Recreation 7.3.3 Fforest Fawr Geopark               |  |  |  |  |  |  |
|  | Continued risk to bat populations from built development; continued risk to other European Protected Species from declining hedgerow and coppiced woodland management (dormice), Water levels and pollution (trout, salmon, twaite and allis shads, sea, river and brook lamprey, bullhead, white-clawed freshwater crayfish, otter, poorly planned development (great crested newts) | 7.3.7 Military Use of the Park  |  |  |  |  |  |  |
|  | Many of the LBAP habitats are currently declining.  |   |  |  |  |  |  |  |
|  | Knowledge gaps relating to the status and distribution of Species of Principal Importance to Wales and the status and condition of Habitats of Principal Importance to Wales (NERC list S42).   |   |  |  |  |  |  |  |
|  | Residual impacts of the natural gas pipeline travelling through the BBNP, which affects both the Rivers Usk and Wye SACs, numerous European Protected Species, 11 Affected Locations and farmland that has been poorly reinstated.  |   |  |  |  |  |  |  |
|  | Increasing abundance of riparian invasive plant species, particularly Japanese knotweed (also along roadsides) and Himalayan balsam, as well as Giant Hogweed, Cotoneaster (on limestone pavement and cliffs), potential increase by Rhododendron, grey squirrel.   |   |  |  |  |  |  |  |
|  | Increase in the risk of damage to flora and fauna from careless recreational use of wetlands.   |   |  |  |  |  |  |  |
|  | Pressure on the Park's biodiversity from the number of economic and social activities   |   |  |  |  |  |  |  |
| Landscape,<br>cultural heritage<br>and the built | Lack of management of historic landscapes, scheduled ancient monuments and other archaeological features  | 7.1.1 Landscape<br>7.1.2 Biodiversity   |  |  |  |  |  |  |

| SA/SEA<br>Topic             | Identified Issues and Trends  | Relevant Plan Strategies   |  |  |  |  |
|-----------------------------|---|--|--|--|--|--|
| environment                 | Affects of the natural gas pipeline on cultural heritage (3 Landscapes of Outstanding/Special Historic Interest), at least 1 historic park and garden and the NP landscape in general, as a consequence of the risk and possible likelihood of poor aftercare and final restoration.                                    | 7.1.4 Historic Environment 7.1.5 Built Environment 7.1.6 Culture and Traditions 7.1.8 Water Resources 7.1.10 Minerals 7.1.11 Energy 7.1.12 Farming |  |  |  |  |
|                             | Adverse effects of changes in agricultural and rural development on the Park's landscape character and features.  Increase in risk of quality and character of the  | 7.1.14 Uplands 7.2.1 Outdoor Access and Recreation   |  |  |  |  |
|                             | built environment and cultural traditions.  | 7.2.4 Education 7.2.5 Interpretation   |  |  |  |  |
|                             | Loss of tranquillity within the Park.  Noise/tranquillity issues in relation to MoD activities.   | 7.3.2 Sustainable Tourism 7.3.3 Fforest Fawr Geopark   |  |  |  |  |
|                             | Changes to the NP resulting in changes to agricultural practices. For example fewer people are exercising their grazing rights, and the anticipated decline in hill farming, thereby undermining the principal means of managing the Park's emblematic uplands and achieving essential improvements to this management. | 7.3.4 Planning and Development 7.3.7 Military Use of the Park  |  |  |  |  |
| Population and human health | Overall increase in population is expected via in-migration.  | 7.1.1 Landscape 7.1.2 Biodiversity   |  |  |  |  |
|                             | Increase in the cost of housing in an area with already a high ratio of house price to income.  | 7.1.5 Built Environment 7.1.8 Water Resources  |  |  |  |  |
|                             | The provision of affordable, low environmental impact and energy efficient housing for local people with fundamental services.  | 7.1.10 Minerals 7.1.11 Energy 7.1.12 Farming   |  |  |  |  |
|                             | Range of implications for the National Park from energy consumptions to planning maintenance of infrastructure to social services.  | 7.1.3 Woodlands 7.1.14 Uplands 7.2.1 Outdoor Access and Recreation   |  |  |  |  |
|                             | Seasonal population fluctuations, impacting on communities, facilities and infrastructure.  | 7.2.3 Information 7.3.1 Sustainable Communities  |  |  |  |  |
|                             | Compared to the rest of Wales health indicators for the NP (based of figures for Powys and Monmouthshire) are all above the national average (positive), with the exception of "Death from Road Traffic Accidents" which is significantly below (negative).   | 7.3.2 Sustainable Tourism 7.3.3 Fforest Fawr Geopark 7.3.4 Planning and Development 7.3.5 Transport  |  |  |  |  |
|                             | Some of the rural areas within the Park suffer from poor access to local services.  |  |  |  |  |  |
| Housing                     | A lack of land available for housing development within Brecon Town.  | 7.1.5 Built Environment 7.1.8 Water Resources  |  |  |  |  |
|                             | Whilst the population of Brecon is projected to increase, the demand for housing is expected to increase at a faster rate. Factors contributing to this include the increase in buy-to-let investments, rising second home ownership and a reduction in the average number of people in each household.                 | 7.1.10 Minerals 7.1.11 Energy 7.3.1 Sustainable Communities 7.3.4 Planning and Development 7.3.5 Transport   |  |  |  |  |

| SA/SEA<br>Topic                | Identified Issues and Trends  | Relevant Plan Strategies  |  |  |
|--------------------------------|---|---|--|--|
|                                | An identified shortfall in the level of affordable housing stock, primarily a result of a rising cost of land and an already limited number of available plots. |   |  |  |
| Economy                        | Employment figures are increasingly concentrated in limited industries.   | 7.1.2 Biodiversity 7.1.6 Culture and Traditions   |  |  |
|                                | The agricultural industry employment figures are decreasing, which reduces the availability of skills and knowledge for land management of conservation.        | 7.1.11 Energy 7.1.12 Farming 7.1.3 Woodlands 7.1.14 Uplands 7.3.1 Sustainable Communities 7.3.2 Sustainable Tourism 7.3.3 Fforest Fawr Geopark 7.3.4 Planning and Development 7.3.5 Transport |  |  |
| Material Assets:<br>Transport, | Lack of railway transport infrastructure and use of services is low.  | 7.1.5 Built Environment 7.1.8 Water Resources   |  |  |
| Waste,<br>Infrastructure       | Increasing dependence on private vehicles as most of the Park is not well served.   | 7.1.10 Minerals<br>7.1.11 Energy  |  |  |
|                                | Need for improved rural transport.  | 7.1.3 Woodlands 7.2.1 Outdoor Access and Recreation 7.3.2 Sustainable Tourism 7.3.4 Planning and Development 7.3.5 Transport 7.3.6 Waste  |  |  |

# 3. How the Sustainability Appraisal Report has been Taken into Account

The SA/SEA process has offered an independent assessment of the potential effects of the Management Plan's vision, aims, strategic objectives and actions. Close liaison between planning officers and SA/SEA consultants has meant that the SA/SEA has provided input at several stages during the development of the NPMP document, helping to modify and inform its content to improve the Plan's overall sustainability and environmental integrity. In the stages leading up to the Sustainability Appraisal Report the process has been influential in the following:

- Production of the SA/SEA Scoping Report identified issues that the NPMP will need to help address. The information within the Scoping Report has also contributed to the NPMP evidence base;
- A Scoping Workshop attended by NPA planning officers, members of environmental bodies (CCW and EAW) and SEA and HRA consultants, provided a useful forum for discussing environmental issues and how the NPMP could respond to these issues. The workshop also helped in determining the scope of the SA/SEA and HRA processes;
- Provision of input into the development of the NPMP vision, aims, strategic objectives and actions; and
- Assessment of the draft NPMP during its preparation.

This iterative approach has improved the Plan, reducing the likelihood of significant adverse effects. As a result, the Sustainability Appraisal Report determined that many of the elements within the Management Plan will have long-term positive effects on the SA/SEA objectives and should help to resolve some of the issues faced in the Park, such as the unfavourable condition of certain habitats, pressures on landscapes from agricultural change, loss of tranquillity, effects of climate change, and loss of land management skills. Assessment of the draft Management Plan identified overall significant positive effects for five of the SA/SEA objectives and no overall significant adverse effects.

Despite these findings, it is important to highlight that although the NPMP encourages sustainable tourism within the Park, increasing number of visitors within the Park may have adverse effects on the Park's water and energy consumption, greenhouse gas emissions, biodiversity, geodiversity, cultural heritage and landscape. Climate change also poses potential problems for the Park's special qualities in the foreseeable future. The Sustainability Appraisal Report included several recommendations to help mitigate potential adverse effects. These recommendations have been incorporated into the Final Plan's strategic objectives and actions where appropriate.

The SA/SEA process requires monitoring of significant environmental effects – both positive and negative. Because significant positive effects have been identified during the assessment of the Management Plan, these will require a monitoring system to be implemented in accordance with the SEA Directive (see Chapter 7 of this Statement). By way of this mechanism and others mentioned herein, the SA/SEA process will continue to aid the delivery of the Management Plan's strategic objectives and actions now and over the course of the next five years. Subsequently, the Plan will be reviewed.

### 4. Consultation

## 4.1. National Park Management Plan

The Brecon Beacons National Park Management Plan is the product of an extensive consultation process involving all those who have a stake in the future of the National Park – local residents, communities, local authorities, environmental governing bodies, NGOs, special interest groups and commercial companies, National Park Authority Members and staff and others. The consultation process officially began in October 2006 with a series of stakeholder workshops in which the vision for the Park and its special qualities were reviewed. Participants also identified key issues and potential impacts that may affect the future of the Park and explored ways of addressing these issues and impacts. National Park Authority (NPA) officers then held similar workshops throughout the Park for local communities. Participating communities also commented on the Park's vision and special qualities and investigated key issues and possible solutions. Information obtained from the consultation process was invaluable to the development of the first Draft Management Plan.

Between I April and 31 August 2008, approximately 650 individuals and groups were sent copies of the first Draft Plan. Over 250 respondents representing a wide cross-section of Park interests submitted comments. Follow-up meetings and telephone conversations took place throughout the consultation period. Ninety-eight different stakeholders participated in seven workshops held in July and August 2008 to review and prioritise management actions to be included in the second Consultation Draft.

Subsequently, the National Park Consultation Draft Version 2 was made available in various formats to approximately 800 stakeholders for a second round of consultation alongside the Sustainability Appraisal Report. The consultation period for Version 2 began 15 July 2009 and concluded on 14 September 2009, though comments were received and considered after this

date. Comments were received by email and post from 35 respondents representing a wide range of stakeholders. Further meetings and telephone conversations took place throughout the consultation period and thereafter.

Four additional public meetings were held in separate locations in and around the Park during October 2009 to review and assess the priority actions. Forty-six residents and/or organisational representatives attended these meetings to comment on the actions and other elements of the Management Plan.

Comments were made with respect to many aspects of the Management Plan during both periods of consultation. In general, comments were constructive; suggested changes were frequently offered to improve the clarity and accuracy of the text. Consequently, most comments and actions were incorporated into subsequent versions of the Plan. In a limited number of instances, comments were not included if they were inconsistent with existing legislation, incongruous with the Park's purposes and duty, did not support the Park's vision, aims and special qualities or were beyond the scope of the Management Plan.

Comments and responses received throughout the consultation process are summarised in National Park Management Plan 2010: Consultation Summary which will be made available on the Park Authority's website at <a href="http://www.breconbeacons.org/the-authority/planning/strategy-and-policy/npmp">http://www.breconbeacons.org/the-authority/planning/strategy-and-policy/npmp</a>.

#### 4.2. **SA/SEA**

In July 2009, the Brecon Beacons National Park Authority (NPA) published its National Park Management Plan Draft Version 2 which was accompanied by an Initial Sustainability Appraisal Report. Both documents were made available to approximately 800 stakeholders in various formats between 15 July 2009 and 14 September 2009. Comments were received and considered after this date.

It is a legal requirement under the SEA regulations for Wales to consult the following designated Consultation Bodies:

- Countryside Council for Wales;
- Environment Agency Wales; and
- Cadw.

In addition, to the designated Consultation Bodies, it is also necessary to consult other stakeholders and the public. To this end a wider range of organisations were contacted including amongst others community groups, health boards and environmental groups. The documents were also made available to the public on the NPA website and at the following locations:

- BBNPA (Head Office in Brecon);
- National Park & Tourist Information Centres at Abergavenny, Brecon, Llandovery and Pontneddfechan; and
- Libraries at Aberdare Central, Abergavenny, Abersychan, Ammanford, Blaenavon, Brecon, Brynaman, Brynmawr, Crickhowell, Dowlais, Ebbw Vale, Gilwern, Hay on Wye, Hirwaun, Llandovery, Llandeilo, Merthyr Tydfil Central, Pontypool, Rhymney, Talgarth, Tredegar, Ystrad Mynach, and Ystradgynlais.

An earlier round of consultation on the Sustainability Appraisal was conducted at the scoping stage in September and October 2007. The outcomes of this consultation process were reported in the Initial SA Report published in July 2009.

Consultation responses on the SA Report were received from the Environment Agency Wales and the Countryside Council for Wales. The following table summarises and provides a response to each of the comments received.

| Summary of Consultation Response   | Action Needed in Response  |  |  |  |  |
|--|--|--|--|--|--|
| Environment  |  |  |  |  |  |
| 3.5.1.5 Water Quality  This section states that "The Environment Agency's General Quality Assessment (GQA) scheme has been used to assess the quality of rivers within the Park". We reiterate comments we made in reference to Section 7.1.8 Water Resources because the Sustainability Appraisal does not reflect the change in classification from General Quality Assessment (GQA) to Water Framework Directive Results (WFD).  Appendix A: Baseline Data Report, also uses GQA to assess the Biological and Chemical quality of rivers. We recommend that WFD results be used to assess the quality of rivers within the National Park. | BBNPA LDP develops further this information will be used to update the baselir so that the LDP SA as well as subsequent rounds of SA on the NPMP can use the most up to date information.  |  |  |  |  |
| 3.5.1.9 Contaminated Land/Landfill/Quarries  Although we agree with the statement that "No contaminated land has been identified in the Park, according to information received from the Unitary Authorities, which are responsible for collecting it," it may be pertinent to consider if there are any sites within the National Park prioritised for future investigation within the relevant Unitary Authorities' contaminated land strategies.  | No action can be taken with respect to this comment at this stage of the SA process for the NPMP. Again these data were not available to the Park Authority at the time. However, as the parallel SA of the BBNPA LDP develops further this will comment will be taken into account.   |  |  |  |  |
| 5.1 Identifying Environmental and Sustainability Issues  Table 5-1 identifies groundwater contamination from old mineworks as an issue. This issue is not addressed within the SA or Management Plan Draft Version 2. There is no confirmation of the extent of the issue within the National Park, or how it is intended to be addressed.   | Although this issue is not specifically addressed the SA framework contains an objective 'to maintain or improve water quality, and minimise the adverse effects of land use on water quality' thereby addressing the issue of water quality generally across the Park.  No action can be taken with respect to this comment at this stage of the SA process for the NPMP. However, as the parallel SA of the BBNPA LDP develops further this will comment will be taken into account.   |  |  |  |  |
|  | Section 7.1.8 of the National Park Management Plan discusses the relevance of groundwater resources and potential issues and concerns. Currently data have not been made available from the Environment Agency to verify the extent and implications of the mineworks issue. At this time the best information available is for groundwater source protection zones identified by the Environment Agency as key areas that need to be protected. These are being considered as part of the development of the Local Development Plan. More generally, strategic objective #I from Section 7.1.8 sets out to "Maintain or improve the quality of the Park's groundwater, rivers and lakes." This will be done on a catchment based approach in accordance with the Water Framework Directive. As and when data become available, the NPA, EAW and relevant partners can develop relevant strategies and action particular to this issue based on the severity of the problem. |  |  |  |  |
| 7.3.5 Promote sustainable use of water resources and minimise adverse effects on water quantity.   | An action plan to address these uncertainties has not been added to the priority actions section of the Management Plan. However, several steps have been taken to   |  |  |  |  |

II th paragraph regarding reference to "There is currently some uncertainty over the effect of small scale hydroelectric power schemes." How these uncertainties will be assessed are not addressed within the Management Plan. We therefore recommend that an action plan to address these uncertainties be included within the Action for Priority section of the Draft Management Plan Version 2.

As previously mentioned in our comments on strategic objective no.5, we do support the intention to encourage the deployment of sustainable renewable energy, and reiterate that we recommend you refer to sustainable hydropower.

qualify the limits of acceptable change. In general, reference has been made to "sustainable hydroelectric power" or "sustainable, small-scale" and "micro-hydro" systems. These terms refer to schemes less than 50kW and that do not interfere significantly with flow along a water course. These terms are defined in the Management Plan glossary. Qualifiers have been placed throughout the Management Plan in association with any proposals for development, including small-scale, sustainable hydropower, that indicate the development must be in keeping with the Park's purposes, duty and special qualities. Additionally, text has been added to strategic objective #5 from Section 7.1.8 stating:

"As with other initiatives, sustainable hydropower schemes must build environmental protection into the siting and design, whatever the scale of the scheme. Where schemes would not be compliant with environmental or other legislation by, for example, preventing the passage of migratory fish or increasing flood risk, their development will not be supported. The EAW are working proactively the NPA and the Green Valleys to encourage sustainable hydropower schemes, and have published Good Practice Guidance that describes how environmental concerns can be accounted for in hydropower schemes."

EAW and the NPA are in the process of developing supplemental planning guidance related to this and other renewable energy options in partnership with other, relevant bodies.

#### **Countryside Council for Wales**

#### 3.2 Review of Policies, Plans and Programmes (PPP)

There could be more consideration of neighbouring authorities' Development Plans, particularly where these are likely to draw upon resources contained in the Park (particularly water resources) or where their policies may increase pressures on the Park (for example, by increased visitor numbers) but many of these issues are considered under the relevant objectives and the main purpose of highlighting them here would be for clarity.

No action can be taken with respect to this comment at this stage of the SA process for the NPMP. However, as previously stated as the parallel SA of the BBNPA LDP develops this will be considered.

#### 3.5 Environmental Characteristics and Trends of the Park

CCW welcomes the efforts made to develop a meaningful baseline despite the difficulties in extracting Park specific data from a wide range of different data sets and sources. We appreciate that this is an on-going process, and look forward to key data sets being developed (such as habitat connectivity maps, invasive plants locations maps for key habitats/sites etc.) to inform the final Management Plan.

No action can be taken with respect to this comment at this stage of the SA process for the NPMP. Information within the NPMP has been based on the most current available data sets at the time of writing. Additional research and development of data and monitoring indicators will be conducted as resources are made available. All research and monitoring requirements will need to be considered within the context of all other priorities for the National Park as a whole. However, as previously stated as the parallel SA of the BBNPA LDP develops this will be considered.

#### 3.5.1.1. Air Ouality

It should be noted that while ammonia levels, as monitored at the 3 nearest monitoring stations outside the Park, are below critical thresholds, ammonia is often a very site specific

Monitoring of ammonia and other air quality indicators, including ground level ozone, will be included within the monitoring framework provided within the SA Adoption Statement. Additional research and development of data and monitoring indicators will be conducted as resources are made available. All research and

issue. This is true for some of the other air quality indicators such as ground level ozone etc. While this leads to significant issues in terms of developing a "baseline" it should not deter the assessment process from identifying where monitoring may be required as specific plan elements are implemented or known sources are identified. We are pleased to see that these elements are included in the list of potential indicators in table 5.2 but would also expect to see this reflected in the final monitoring strategy

monitoring requirements will need to be considered within the context of all other priorities for the National Park as a whole.

#### 3.5.1.4 Renewable energy

While CCW strongly supports the principle of renewable energy development, the special nature of the National Park dictates that particular care is given to the potential negative environmental and landscape impacts inappropriate or poor located schemes can sometime have. The requirement for special care when considering such proposals should be clearly set out when considering any objectives or indicators for this aspect of the plan. We note that the specific policy relating to hydroelectricity generation has been amended as a result of the HRA and that we have recommended you consider additional amendments to ensure compliance with the Habitats Regulations.

No action can be taken with respect to this comment at this stage of the SA process for the NPMP. However, as previously stated as the parallel SA of the BBNPA LDP develops this will be considered. See response to Environment Agency Wales above for a related comment.

#### 3.5.1.6 Water Availability

This section should also note that the main sources of water within the Park, the Wye, Usk and Tywi are all European Special Areas of Conservation (SACs), and there accorded the highest level of statutory protection. The aspects of the plan relating to this topic will be a key element of the HRA and this, and the Review of Consents process, should be mentioned in the text.

Section 3.5.1.6 currently notes that these sources of water are all SACs. The text has been edited to reflect these suggestions. AS previously stated as the parallel SA of the BBNPA LDP develops this will be considered.

#### 3.5.1.7 Flood Risk

We welcome the clear acknowledgement of the Catchment Flood-risk Management Planning process in this section. CCW will be seeking to work alongside Environment Agency Wales and all stakeholders to implement many of the positive environmental benefits of the CFMPs and ensure where hard engineering options may be required they are dealt with holistically and in such a way as to minimise any potential negative environmental effects. It is vital that the SEA process and the Management Plan itself support this approach as in many cases it will support key objectives within the Plan and the assessment process (such as rewetting of upland catchments, sustainable drainage schemes and soil conservation measures).

No action required.

#### 3.5.2.1 Light Pollution

While CCW welcomes the increased use of "non-spill" street lighting in the park we also feel it is premature to consider that this is leading to an improvement in the situation, as there is still increasing "urbanisation" or small villages and country roads leading to increased light pollution over-all. We would also draw your attention to the recently published tranquillity maps for Wales (2009) which should be referenced as appropriate.

No action can be taken with respect to this comment at this stage of the SA process for the NPMP. Please note that again the CCW tranquillity maps were not available to the public or the National Park Authority at the time of analysis. However, as previously stated as the parallel SA of the BBNPA LDP develops this will be considered. The text in the LDP SA will be amended to read:

However, although the situation may be improving as non spill street lighting is being used more often in the Park, especially on major roads outside settlements to

|   | reduce light pollution, increasing urbanisation in the Park is counteracting these improvements.   |  |  |  |  |
|---|--|--|--|--|--|
| Table 5-2: The SEA/SA and framework issues, objectives and questions. Objective 15. Promote and improve accessibility to the Park and to its opportunities and facilities  CCW re-iterate our recommendation, made in our response to the scoping report, of the use of the Accessible Natural Green Space Toolkit (ANGST) to assess if there is appropriate green space of suitable size and quality, accessible to all the citizens of an area. The availability and quality of the footpath network are only partial indicators and, while we appreciate the largely "rural" nature of the park, this does not guarantee free access to natural green space (a community may be surrounded by "countryside" but it may be inaccessible or fail to meet the "naturalness" criteria). We strongly recommend that BBNPA do a scoping study to reassure themselves that all their settlements meet the standard. | Indicators addressing access to green spaces and public rights of way were included in response to CCW request at Scoping. The use of ANGST is not considered an appropriate indicator for the SEA and currently resources are not available to conduct a scoping study of this nature, but they may be available in the future, especially if CCW are willing to conduct or fund this work as a priority.         |  |  |  |  |
| Section 5.4 Compatibility of SA/SEA Objectives  | Monitoring of uncertainties will be considered within the monitoring framework which will be developed in the SA Adoption Statement based on available data and  |  |  |  |  |
| CCW welcome the identification of uncertainties and potential conflicts in the compatibility matrix. It will be important that these uncertainties are covered by the monitoring strategy and CCW look forward to working with the Park Authority in the further development of this area of the Plan.  | resources.   |  |  |  |  |
| Section 6: Alternatives Assessment  | Although it was not made clear within the SA Report the assessment of the NPMP   |  |  |  |  |
| It is appreciated that this is one of the more complex areas of the SEA process, particularly when trying to calculate synergistic and cumulative effects between objectives. As outlined in the report, the very nature of the National Park Management Plan also limits the number of viable options and alternatives that can be meaningfully considered. The process of evaluation used in this report is a reasonable one but it also highlights that each of the alternatives has a range of impacts.   | was undertaken against the business as usual case. No action can be taken with respect to this comment at this stage of the SA process for the NPMP. However, as previously stated as the parallel SA of the BBNPA LDP develops this will be considered.   |  |  |  |  |
| One of the key alternatives it should be possible to test against is what the potential impacts on the indicators might be in the instance of the plan not being implemented (the "business as normal" option). We would expect to see this included at some point in the SEA process as it gives a valuable baseline for some objectives which may have unavoidable adverse impacts but as they are present in every option become "accepted" into the process.  |  |  |  |  |  |
| 7.3 Assessment by SA Objective  | As the monitoring framework is developed for the SA Adoption Statement a table should be created which cross references the SA/SEA objectives and potential  |  |  |  |  |
| It would be useful to cross-reference the various mitigation proposals identified (possibly in tabular form) and the monitoring strategy, where appropriate.  | monitoring indicators.   |  |  |  |  |
| 7.3.5 Promote sustainable use of water resources and minimise adverse effects on water quantity.  We accept that there is much in the Management Plan that will contribute positively to reducing the significant negative environmental effects it might have on water resources, particularly from the SAC Rivers (Usk, Wye and Tywi). We also note the comprehensive   | Qualifications and clarifications throughout the Management Plan of this very nature have been made at the suggestion of both EAW and CCW. Specific changes have been made to the text as a result of the recommendations. As previously stated as the parallel SA of the BBNPA LDP develops this will be considered. The SA of the LDP should consider the findings of the HRA with regard to water resources and |  |  |  |  |

| way that these potential effects are dealt with and the likely severity of the potential impacts. However, as there are elements of the plan, identified within the assessment, that still have the potential to lead to significant environmental effects we feel that further clarification may be necessary. Unlike the Brecon Beacons National Park LDP, the NPMP may not be proposing specific levels of development, housing and economic growth, but it still supports the framework for such development and, therefore, should consider the implications of this on water resources. We refer you to our response on the HRA for further advice on approaching this element within the assessment.       | these should be reflected in the assessment.   |
|---|--|
| 7.3.13 Increase sustainable transport opportunities.  While the SA/SEA clearly shows that this will lead to generally positive environmental effects we think that there are further positive aspects that could be promoted. Encouraging greater availability of cycle hire is one potential method, as identified, however, there are many others, such as improving inter-modal transfers, supporting "request stop" services etc. that should also be considered. These should be closely linked with the relevant Regional Transport Plan initiatives.   | Noted. No action can be taken with respect to this comment at this stage of the SA process for the NPMP. However, as previously stated as the parallel SA of the BBNPA LDP develops this will be considered. These recommendations for increasing sustainable transport opportunities should also be considered as the LDP develops.   |
| 7.3.15 Promote and improve accessibility to the Park and to its opportunities and facilities  Many elements of the NPMP have the potential to have positive environmental effects in relation to promoting accessibility, however, with regard to realising the full potential of the Monmouth and Brecon Canal care should be taken to refer to the potential impacts related to the navigational usage of the canal, particularly in relation to it's primary extraction point on the River Usk SAC near Brecon. This should be related to the water resource issue and take into account any potentially significant effects identified in the HRA and/or the Environment Agency's Review of Consents process. | Noted. No action can be taken with respect to this comment at this stage of the SA process for the NPMP. However, as previously stated as the parallel SA of the BBNPA LDP develops this will be considered. This potential effect should be considered as the LDP develops and considered when undertaking further assessment work. In addition, any effects identified in the HRA or the Environment Agency's Review of Consents processes should be reflected in the LDP SA assessment, particularly the assessments on the biodiversity and water. |
| 7.4 Difficulties encountered in undertaking the assessment  | See previous responses.  |
| See comments on section 3.5.  |  |
| Section 8 Monitoring  We would emphasise that while the SEA identified only positive environmental effects resulting from the NPMP, many of these are based on assumptions and will be subject to effective delivery of the Plan (and its companion plans, such as the LDP). Therefore, we anticipate that the majority of monitoring indicators are likely to be for positive elements of the Plan, there will be a need to identify which objectives will need to be monitored to ensure that the potential negative impacts (such as those related to hydroelectricity generation, water resources etc.) do not manifest themselves.   | As the monitoring framework is developed, consideration will need to be given to monitoring of uncertain negative effects.   |

# 5. Changes to the National Park Management Plan

Several changes were made to the National Park Management Plan based on the comments received during the second round of consultation. These comments have been incorporated into the adopted Management Plan where they were consistent with the Park's statutory purposes and duty. The majority of comments resulted in minor changes in the text of the document, primarily of an editorial nature; very few changes affected the meaning of the vision, aims, strategic objectives or actions, or added new items. Where these changes have been substantive, the new or altered content has been assessed against the sustainability and environmental objectives utilised in the original Sustainability Appraisal Report.

Only one strategic objective was altered significantly enough to require re-evaluation. The effects of this strategic objective were found to be either positive or neutral; no significant positive or negative effects were associated with it. The results of this assessment are contained in Table 5.1. Examination of the supporting text indicated that the effects and outcomes are intended to enhance the Park's special qualities as well as the socio-economic well-being of local communities despite initial uncertainties associated with the abbreviated title. The scoring matrix is depicted in Table 5.2.

Table 5.1. Evaluation of NPMP strategic objectives added or altered significantly as a result of the last consultation.

|         |  | I. Climate Adaptation. | 2. Climate Mitigation. | 3. Air Quality. | 4. Water Quality. | 5. Water Quantity. | 6. Soils. | 7. Geodiversity. | 8. Biodiversity. | 9. Cultural Heritage. | 10. Built environment. | II. Landscape. | 12. Material Assets. | 13. Transport. | 14. Population. | 15. Accessibility. | 16. Education/skills. | 17 Economy |
|---------|--|------------------------|------------------------|-----------------|-------------------|--------------------|-----------|------------------|------------------|-----------------------|------------------------|----------------|----------------------|----------------|-----------------|--------------------|-----------------------|------------|
| Uplands | 4. Maximise opportunities for growing the local economy. | +                      | +                      | 0               | +                 | +                  | +         | 0                | +                | +                     | 0                      | +              | +                    | 0              | 0               | 0                  | +                     | +          |

Table 5.2. Scoring matrix used to evaluate the NPMP content against SA/SEA objectives.

| Significance<br>Assessment | Description   |  |  |  |  |  |
|----------------------------|---|--|--|--|--|--|
| ++                         | Plan element would have a major positive effect on sustainability in its current form as it would resolve an existing issue or maximise opportunities.  SIGNIFICANT |  |  |  |  |  |
| +                          | Plan element would have a <b>MINOR</b> positive effect on sustainability.   |  |  |  |  |  |
| ?                          | Effect of option on sustainability is uncertain.  |  |  |  |  |  |
| 0                          | Plan element would have a neutral effect on sustainability.   |  |  |  |  |  |
| -                          | Plan element would have a <b>MINOR</b> adverse effect on sustainability.  |  |  |  |  |  |
|                            | Plan element would have a major adverse effect on sustainability as it would substantially exacerbate existing problems. Consider exclusion of option.  SIGNIFICANT |  |  |  |  |  |

As a result of consultation, significant changes were made to the priority actions. Most notably the number of actions was reduced significantly to reflect the priorities of the Park's stakeholders, the Authority and its partners. Many actions were combined with similar actions or refined to reflect the input received. Consequently, the priority actions were organised into a hierarchical framework as presented in Chapter 8 of the National Park Management Plan. Detailed actions, including secondary actions that are considered important but may have not made the prioritised list, will be presented in the forthcoming National Park Management Plan: Priorities for Action Plan.

Again, where these actions have been changed significantly from the second draft Management Plan or where new actions have been added, these have been evaluated using the existing sustainability and environmental objectives. Most actions resulted in positive or neutral effects on the sustainability and environmental objectives. A few indicated levels of uncertainty. Only one action resulted in an additional significant positive effect. This effect was in relation to the biodiversity objective. This action will be monitored in accordance with SA/SEA guidance alongside other strategic objectives and actions identified previously as having significant positive effects. The results of this analysis are depicted in Annex 1: Evaluation of NPMP actions added or altered significantly as a result of the last consultation.

No significant adverse effects were noted for any of the Management Plan's vision, aims, strategic objectives or actions in the initial or subsequent assessments. This result is to be expected of a document with a core aim to encourage the sustainable management of a national resource and protected area.

# 6. Reasons for Choosing the Plan as Adopted

The Brecon Beacons National Park Authority conducted a series of public engagement events designed to explore the vision for the future of the National Park as well as its special qualities. Throughout this process many alternative views have been considered. The options presented to the NPA have been evaluated carefully by the Authority with respect to:

- The National Park's statutory purposes and duty;
- Welsh Assembly Government's vision for the National Parks of Wales;
- Previous vision statements, special qualities, aims and strategic objectives; and
- Other international, national, and local legislation, policies and plans (outlined in the Scoping Report and appended in the Sustainability Appraisal Report).

While the possibility exists for a significant number of potential options or alternatives, these are effectively limited by the aforementioned criteria which act like filters in choosing plausible alternatives from the options presented during the consultation process. The alternatives for the National Park Management Plan, then, are determined through a combination of stakeholder input and coarse evaluation based on pre-existing policies. The alternatives are very coarse at the vision stage but have been refined through additional consultation events designed to help determine the aims, strategic objectives and actions.

During the preparation of the draft Management Plan, an interim assessment of the proposed vision, aims, strategic objectives and actions was undertaken. The Authority used this assessment during the development of the proposed Plan. This was then followed by a second round of assessment of the draft Management Plan, the results of which have been published in the Sustainability Report. This final assessment was used to help the NPA finalise the Management Plan and prioritise the actions. Changes to the Plan's vision, aims, strategic objectives and actions have been made throughout this process in response to SA/SEA assessments and stakeholder input. (See Figure NTS1 in the Sustainability Appraisal Report for a summary of the SA/SEA and Management Plan process.)

Consequently, consideration of sustainability and environmental effects early in the process and then at subsequent stages has meant that no adverse effects or incompatibilities have been identified between the Management Plan elements and the SA/SEA objectives. Although there is potential for adverse effects within the areas of uncertainty, the Management Plan is likely to have a positive effect on sustainability and the environment in the Park. The Brecon Beacons National Park Management Plan 2010-2015 provides the most effective means to guide the delivery of the Park's statutory purposes and duty, whilst mitigating potential adverse effects, maximising the positive effects and, where possible, enhancing the Park's special qualities.

# 7. Monitoring

The SA/SEA process requires monitoring of significant environmental effects identified during the assessment – both positive and negative. The assessment of the National Park Management Plan identified no significant adverse effects on the SA/SEA objectives; however, it identified significant positive effects for each of the 17 SA/SEA objectives which will require a monitoring system to be implemented in accordance with the SEA Directive. Countryside Council for Wales' guidance for the preparation of National Park Management Plans also requires monitoring of the Plan and its effects on the state of the Park's resources. Additionally, monitoring is best practice even if no significant environmental effects have been identified, particularly for elements of uncertainty. This will help to provide for monitoring of any unforeseen effects whilst it improves management of the Park's landscape and its special qualities.

Monitoring requirements associated with the SA/SEA process are recognised as placing heavy demands on authorities with SA/SEA responsibilities. For this reason, this monitoring framework for the Management Plan will focus on those aspects of the Park that are likely to be significantly impacted upon, or where the impact is uncertain. Where uncertain effects are to be monitored, resource limitations dictate that efforts focus on aspects which are most likely to be adverse.

Monitoring of the SA/SEA, including monitoring of the significant effects and aspects of uncertainty, will be incorporated into the overall Management Plan monitoring programme. Monitoring will be undertaken through:

- Annual reports summarising progress being made towards the Management Plan actions:
- The statutory, five year review of the Management Plan, Local Development Plan and SA/SEA objectives; and

• Periodic monitoring of the state of the Park's resources, published in the State of the Park Report (SOPR).

Potential monitoring indicators for each of the SA/SEA objectives were highlighted previously in the Sustainability Appraisal Report, Table 5.2. CCW and EAW have subsequently offered suggestions for other potential monitoring indicators. A subset of these indicators are summarised in Table 7.1. All 17 SA/SEA objectives are included here since each objective has at least one Management Plan aim, strategic objective or action associated with it that is likely to result in a significant positive effect. Each of the monitoring indicators has been chosen to specifically address the relationship between a SA/SEA objective and the relevant strategic objective or action determined to give rise to significant likely effect. Other indicators will be considered as the monitoring programme is refined with consideration given to several factors, including data and resource availability, practicality, relevance and monitoring costs.

The monitoring programme not only includes State of the Park monitoring but also encapsulates monitoring requirements for the Local Development Plan. According to CCW's National Park Management Plan Guidance (2006, para. 3.19), the SOPR should "develop a seamless link, through identified indicators, between the State of the Park Report, the Management Plan objectives, the SEA objectives and potentially aspects of the annual monitoring report for the Local Development Plan of the National Park." Consequently, potential indicators listed in Table 7.1 will need to be modified to incorporate the outcomes of the Local Development Plan consultation, ongoing SA/SEA assessment and forthcoming SOPR review.

Additionally, the NPA has developed a series of indicators that will help address the uncertainties identified in relation to several of the Management Plan's sustainable tourism and recreation strategic objectives and actions and their potential effects on Park resources. This suite of indicators and an explanation of the process used to derive them is included in the Sustainable Tourism Indicators for the Brecon Beacons National Park (March 2010) report which can be found on the NPA's website at <a href="http://www.breconbeacons.org/the-authority/working-in-partnership/tourism-new/sustainability-1">http://www.breconbeacons.org/the-authority/working-in-partnership/tourism-new/sustainability-1</a>.

Table 7.1. Monitoring framework for the National Park Management Plan listing SA/SEA objectives and potential indicators.

| SA/SEA OBJECTIVES   | INDICATORS  |
|---|---|
| I. Ensure that adequate measures are in place to adapt to the impacts of climate change.                      | Planning schemes meeting the National requirements for<br>sustainable design and in line with the NPA's Sustainable<br>Design Guide.                                    |
|   | Planning permissions approved causing significant concerns for potential transport impacts.   |
| Mitigate effects on climate change by reducing greenhouse gas emissions in both existing and new development. | Amount of development (indicated by Tan 15 para 5.1 Development category) permitted in C1 & C2 floodplain areas not meeting all TAN 15 tests (para 6.2).                |
|   | Planning schemes for micro renewable energy appropriate to their location and special qualities of the National Park.   |
| 3. To maintain or improve air quality.  | <ul> <li>Local authority air quality monitoring indicators (1,3-butadiene, benzene, carbon monoxide, lead, NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub>).</li> </ul> |
| 4. Maintain or improve water quality, and minimise the adverse effects of land use on water quality.          | Compliance with water quality objectives under the Water Framework Directive.   |
|   | Percentage of new development with Sustainable Urban     Drainage Systems.  |
|   | River water phosphate and nitrate levels.   |
| 5. Promote sustainable use of water resources and minimise adverse effects on water quantity.                 | No. of developments incorporating water conservation measures, such as grey water systems.  |
|   | Incidences of low flows/droughts and the onset of low   |

| SA/SEA OBJECTIVES   | INDICATORS  |
|---|---|
|   | flow related abstraction licence conditions.  |
| 6. To protect and enhance soil quality (including non-<br>chemical soil functions and processes such as permeability)<br>and quantity, especially of carbon rich soils. | Pesticide concentrations and nutrient loads in water bodies.  |
| 7. Conserve geodiversity and promote the understanding and enjoyment of geodiversity.   | No. and condition of sites of geological importance in favourable condition.  |
|   | No. of visitors attending Geopark functions.  |
|   | Number of geological sites being used for their intended purpose (e.g. education, geo-tourism).   |
|   | No. of active landscape-scale conservation projects in the Park.  |
| 8. To value, conserve and enhance the diversity of species, habitats and ecosystems.  | No. of active landscape-scale conservation projects in the Park.  |
|   | Number of agri-environmental schemes including provision for wildlife.  |
|   | Status and trends for Biodiversity Action Plan target species and habitats.   |
|   | No. of SSSI sites in favourable condition.  |
|   | <ul> <li>Connectivity and fragmentation status of key wildlife<br/>habitats categories across the Park.</li> </ul>  |
|   | Percentage of woodland habitat restored to upland<br>blanket bogs, upland heathland and upland oakwoods.  |
|   | Proportion of priority habitats that are isolated from other appropriate habitats.  |
| 9. To understand, value, protect and manage historic landscapes, scheduled ancient monuments and other  | % of historic landscape with up to date character appraisal.  |
| archaeological features appropriately.  | No. of parks and gardens recorded as being in satisfactory/ good condition.   |
|   | No. of Scheduled Ancient monuments recorded as being<br>in satisfactory/ good condition.  |
|   | No. of planning applications which have conditions attached to ensure the protection archaeological resources.  |
| 10. Maintain and enhance the quality of the built   | No. of Listed Buildings at risk.  |
| environment.  | % of Conservation Areas with up-to-date character appraisal.  |
|   | No. of building in Conservation Areas affected by detrimental changes.  |
| 11. Maintain and enhance the Park's landscape character   | Area of land given over to development each year.   |
| and its associated features.  | No. of active landscape-scale conservation projects in the Park.  |
|   | Amount of Greenfield and open space lost to<br>development (ha) which is not allocated in the LDP.  |
|   | Participation in Catchment Sensitive Farming initiatives.   |
| 12.14   | Level of light pollution.   |
| 12. Make sustainable use of natural resources and build and maintain environmentally friendly, high quality, services and infrastructure.                               | Permissions approved causing significant concerns for potential transport impacts   |
|   | <ul> <li>Development proposals demonstrating a provision for<br/>reducing waste, facilitating the reuse &amp; recycling of waste,<br/>and safe waste disposal has been made.</li> </ul> |
| 13. Increase sustainable transport opportunities.   | Permissions approved without improving traffic and<br>parking management and providing appropriate access for<br>cyclists and pedestrians.  |
|   | <ul> <li>No. of initiatives supported by the SDF to develop and<br/>support sustainable transport initiatives designed to<br/>reduce the carbon footprint.</li> </ul>                   |

| SA/SEA OBJECTIVES   | INDICATORS  |
|---|---|
| 14. Maintain distinctive cultural identity and ensure the needs of the changing demographics are reflected. | <ul> <li>% of Park's population having some knowledge of Welsh.</li> <li>Distances travelled per person per year by mode of transport.</li> </ul> |
| 15. Promote and improve accessibility to the Park and to its opportunities and facilities.                  | <ul> <li>Visitor surveys to measure visitor satisfaction.</li> <li>Distances travelled per person per year by mode of transport.</li> </ul>       |
| 16. Increase opportunities to build an education and skills base.   | No. of groups brought to the Park by Community<br>Champions.  |
| 17. Promote a thriving, locally-based economy.  | <ul><li>Approvals for farm diversification schemes.</li><li>Visitor surveys to measure visitor satisfaction.</li></ul>                            |

Long-term monitoring of trends from these or similar indicators will:

- Show whether policies in the Management Plan and Local Development Plan are being effective;
- Help identify key issues;
- Highlight areas where more information and research are required;
- Help target resources where they are most needed; and
- Support bids for funding.

Indicators within this framework will need to be reviewed and updated as appropriate to allow measurement of Management Plan implementation, the Local Development Plan effectiveness and realisation of SA/SEA objectives. Timing and periodicity of each monitoring element will be dependent upon the practicalities of data measurement, monitoring schedules of cooperating organisations responsible for specified data sets, availability of the data and the ability to detect appreciable change over time.

In similar fashion to the development of the sustainable tourism indicators, monitoring indicators will be divided into three distinct categories: those that are immediately available and/or can be implemented, those that require some development, and those that require significant investment before they can be utilised. No single indicator can fully capture the status and trends associated with any of the Park's resources or any of the I7 SA/SEA objectives; it is likely that multiple indicators will need to be chosen for each. The need for a suite of indicators to effectively monitor the status, trends and issues related to each of the Park's resources and the SA/SEA objectives must be balanced with the availability of time, money and data.

Like the Management Plan, the SOPR and Local Development Plan relate to the Park area and its people, not just to the work of the NPA. Consequently, effective monitoring will require collaboration with and cooperation among the many partners and organisations involved in the management of the National Park, particularly those entities maintaining relevant monitoring data and information.

# Annex I:

Evaluation of NPMP actions added or altered significantly as a result of the last consultation.

| Theme  | Actions for Priority  | Specific Actions (New or changed-needs to be re-evaluated)  | 1. Climate Adaptation. | 2. Climate Mitigation. | 3. Air Quality. | 4. Water Quality. | 5. Water Quantity. | 6. Soils. | 7. Geodiversity. | 8. Biodiversity. | 9. Cultural Heritage. | 10. Built environment. | 11. Landscape. | 12. Material Assets. | 13. Transport. | 14. Population. | 15. Accessibility. | 16. Education/skills. | 17. Economy. |
|--|---|---|------------------------|------------------------|-----------------|-------------------|--------------------|-----------|------------------|------------------|-----------------------|------------------------|----------------|----------------------|----------------|-----------------|--------------------|-----------------------|--------------|
| Theme I: Managing Park landscapes to maximise conservation and public benefits | Maximise the benefits of Glastir entry level and higher level schemes within the National Park. | Attract new investment for managing the Park's landscape to mitigate and adapt to the effects of climate change.  | +                      | +                      | 0               | 0                 | +                  | +         | 0                | 0                | 0                     | 0                      | +              | 0                    | 0              | 0               | 0                  | 0                     | +            |
|  |   | Assist in the creation of statutory Commons Associations.   | 0                      | 0                      | 0               | 0                 | 0                  | 0         | 0                | 0                | +                     | 0                      | 0              | 0                    | 0              | 0               | 0                  | +                     | 0            |
|  | Protect and manage the Park's woodlands.  | Implement Better Woodlands for Wales<br>Strategy within the Park.   | +                      | +                      | 0               | +                 | +                  | +         | 0                | +                | +                     | 0                      | +              | 0                    | 0              | 0               | +                  | +                     | +            |
|  |   | Explore the potential for Coed Cymru involvement in managing the Park's woodlands.  | 0                      | 0                      | 0               | 0                 | 0                  | 0         | 0                | +                | 0                     | 0                      | +              | 0                    | 0              | 0               | 0                  | 0                     | 0            |
|  |   | Maintain forests in appropriate areas whilst integrating them into the landscape through sustainable forest design principles.  | 0                      | 0                      | 0               | 0                 | 0                  | +         | 0                | +                | 0                     | 0                      | +              | 0                    | 0              | 0               | 0                  | 0                     | 0            |
|  |   | Facilitate community woodland agreements within easy access of existing and future towns and villages to contribute to local GDP and to an improved sense of health and well being. | +                      | +                      | 0               | 0                 | 0                  | 0         | 0                | +                | ?                     | 0                      | +              | 0                    | 0              | +               | +                  | 0                     | +            |
| Theme 2:<br>Conserving<br>and<br>enhancing                                     | Protect and manage the Park's biodiversity.   | Restore and enhance habitat connectivity along river valleys.   | 0                      | 0                      | 0               | ?                 | 0                  | ?         | 0                | +                | 0                     | 0                      | +              | 0                    | 0              | 0               | 0                  | 0                     | 0            |

| Theme   | Actions for Priority  | Specific Actions (New or changed-needs to be re-evaluated)  | 1. Climate Adaptation. | 2. Climate Mitigation. | 3. Air Quality. | 4. Water Quality. | 5. Water Quantity. | 6. Soils. | 7. Geodiversity. | 8. Biodiversity. | 9. Cultural Heritage. | 10. Built environment. | 11. Landscape. | 12. Material Assets. | 13. Transport. | 14. Population. | 15. Accessibility. | 16. Education/skills. | 17. Economy. |
|---|---|---|------------------------|------------------------|-----------------|-------------------|--------------------|-----------|------------------|------------------|-----------------------|------------------------|----------------|----------------------|----------------|-----------------|--------------------|-----------------------|--------------|
| biodiversity  |   |   |                        |                        |                 |                   |                    |           |                  |                  |                       |                        |                |                      |                |                 |                    |                       |              |
|   | Develop and implement community-based biodiversity projects for the benefit of the public and wildlife.   | Deliver an annual programme of volunteer activities targeted at biodiversity action.  | 0                      | 0                      | 0               | 0                 | 0                  | 0         | 0                | +                | 0                     | 0                      | 0              | 0                    | 0              | 0               | 0                  | +                     | 0            |
| Theme 3: Provide opportunities for outdoor access and recreation              | Use funding and resource opportunities to improve countryside access  | Develop and maintain access on Wildlife Trust-owned reserves.   | 0                      | 0                      | 0               | 0                 | 0                  | 0         | 0                | ?                | 0                     | 0                      | 0              | 0                    | 0              | 0               | +                  | +                     | 0            |
| Theme 5: Building and maintaining sustainable communities, towns and villages | Encourage and support community-led initiatives that build awareness of and resilience to climate change, fossil fuel depletion and carbon emissions. | Develop a conservation and community benefits revenue stream through implementation of the Planning Obligations Strategy and subsequent amendments. | +                      | +                      | +               | +                 | +                  | 0         | 0                | +                | 0                     | 0                      | ?              | +                    | 0              | +               | 0                  | 0                     | ?            |

| Theme  | Actions for Priority   | Specific Actions (New or changed-needs to be re-evaluated)  | 1. Climate Adaptation. | 2. Climate Mitigation. | 3. Air Quality. | 4. Water Quality. | 5. Water Quantity. | 6. Soils. | 7. Geodiversity. | 8. Biodiversity. | 9. Cultural Heritage. | 10. Built environment. | 11. Landscape. | 12. Material Assets. | 13. Transport. | 14. Population. | 15. Accessibility. | 16. Education/skills. | 17. Economy. |
|--|--|---|------------------------|------------------------|-----------------|-------------------|--------------------|-----------|------------------|------------------|-----------------------|------------------------|----------------|----------------------|----------------|-----------------|--------------------|-----------------------|--------------|
|  |  | Assist the development of appropriate renewable energy schemes that produce mutually beneficial outcomes for local communities and the local environment.   | +                      | +                      | +               | ?                 | ?                  | ?         | 0                | +                | 0                     | 0                      | 0              | +                    | 0              | +               | 0                  | 0                     | +            |
|  |  | Collaborate with Farming Connect to identify on-farm, sustainable energy projects and promote these as examples of best practice.   | +                      | +                      | +               | ?                 | ?                  | ?         | 0                | ?                | +                     | 0                      | 0              | 0                    | 0              | +               | 0                  | 0                     | +            |
|  | Support local food production.   | Support allotments development.   | 0                      | 0                      | 0               | 0                 | 0                  | 0         | 0                | 0                | +                     | +                      | 0              | +                    | +              | +               | +                  | +                     | 0            |
|  | Support initiatives which enhance community pride in and benefit from the National Park designation. | Promote the use of recycled, secondary and waste materials to supply the need for local building stone where compatible with the statutory conservation objectives of the National Park and its relevant planning policies. | 0                      | 0                      | 0               | 0                 | 0                  | 0         | +                | 0                | +                     | +                      | ?              | +                    | 0              | 0               | 0                  | 0                     | 0            |
|  | Deliver a sound<br>Local<br>Development<br>Plan.   |   | +                      | +                      | 0               | +                 | +                  | 0         | 0                | +                | +                     | +                      | +              | +                    | +              | +               | +                  | 0                     | +            |
| Theme 6:<br>Sustainable<br>economic<br>development | Maintain and develop partnership working.  | Apply to Europarc for renewed Charter status.   | 0                      | 0                      | 0               | 0                 | 0                  | 0         | 0                | 0                | 0                     | 0                      | +              | 0                    | 0              | 0               | 0                  | 0                     | 0            |
|  | Support farmers in changes affecting the future of farm practices and                                | Work with interested farmers to develop products and services that capitalise on the National Park's status.  | 0                      | 0                      | 0               | 0                 | 0                  | ?         | 0                | ?                | +                     | 0                      | +              | 0                    | 0              | +               | 0                  | +                     | +            |

| Theme | Actions for<br>Priority | Specific Actions (New or changed-needs to be re-evaluated)       | 1. Climate Adaptation. | 2. Climate Mitigation. | 3. Air Quality. | 4. Water Quality. | 5. Water Quantity. | 6. Soils. | 7. Geodiversity. | 8. Biodiversity. | 9. Cultural Heritage. | 10. Built environment. | 11. Landscape. | 12. Material Assets. | 13. Transport. | 14. Population. | 15. Accessibility. | 16. Education/skills. | 17. Economy. |
|-------|-------------------------|--|------------------------|------------------------|-----------------|-------------------|--------------------|-----------|------------------|------------------|-----------------------|------------------------|----------------|----------------------|----------------|-----------------|--------------------|-----------------------|--------------|
|       | businesses.             |  |                        |                        |                 |                   |                    |           |                  |                  |                       |                        |                |                      |                |                 |                    |                       |              |
|       |                         | Support farmers who wish to diversify in non-agricultural areas. | 0                      | 0                      | 0               | 0                 | 0                  | 0         | 0                | ?                | +                     | 0                      | +              | 0                    | 0              | +               | 0                  | +                     | +            |

# **Scoring Matrix**

| Significance<br>Assessment | Description   |
|----------------------------|---|
| ++                         | Plan element would have a major positive effect on sustainability in its current form as it would resolve an existing issue or maximise opportunities.  SIGNIFICANT |
| +                          | Plan element would have a MINOR positive effect on sustainability.  |
| ?                          | Effect of option on sustainability is uncertain.  |
| 0                          | Plan element would have a neutral effect on sustainability.   |
| -                          | Plan element would have a <b>MINOR</b> adverse effect on sustainability.  |
|                            | Plan element would have a major adverse effect on sustainability as it would substantially exacerbate existing problems. Consider exclusion of option.  SIGNIFICANT |