

Habitats Regulations Assessment of the draft National Park Management Plan for National Park Authority on 24 September 2021.

I. Relevant background and introduction

Brecon Beacons National Park Authority (BBNPA) is required to prepare a Management Plan for the Brecon Beacons National Park (“the Plan”). The Plan being developed sets out how the BBNPA will work with other stakeholders to secure the National Park purposes.

The Environment Act 1995 establishes two statutory purposes for the National Park; these frame the way in which all other responsibilities are delivered.

The purposes are to:

1. Conserve and enhance the natural beauty, wildlife and cultural heritage; and
2. Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.

Any irreconcilable conflict between the purposes are to be resolved in favour of the purpose to conserve and enhance the natural beauty, wildlife and cultural heritage.

In acting to deliver the purposes BBNPA should also find ways in which its work may help to foster the economic and social well-being of local communities within the Park (the Duty).

BBNPA is party to a statement of confirmation made to the International Union for Conservation of Nature (IUCN); the statement is the basis on which the Brecon Beacons National Park is recognised as a Category V protected area and included on the world database of protected areas. As a category V protected area, the IUCN can expect the BBNPA to give a high priority to the conservation of nature in the aims and objectives of the Plan.

The Plan also sets out the BBNPA’s well-being objectives; helping to frame the contribution of the Brecon Beacons National Park to sustainable development in Wales. Furthermore, the Plan seeks to capture and deliver on the definition, objective and principles of the Sustainable Management of Natural Resources (SMNR).

For the purpose of an assessment of the Plan under the Habitats Regulations, it is relevant to note that the first part of the Plan introduces the Brecon Beacons National Park and defines the special qualities which may be found and experienced when visiting. The vision, objectives and outcomes along with the associated underpinning policies provide the main framework for management interventions.

1.1 Results of 2010 NPMP HRA

The Habitats Regulations Assessment of the existing Management Plan (2010, as amended in 2015) considered the potential for impacts for its Aims, Strategic Objectives and Actions. The assessment found the Plan as being highly protectionist and precautionary in relation to potential biodiversity impacts, providing clear policy protection and management actions designed to avoid effects on the Natura 2000 network and as having no significant effect on any of the European sites considered, either alone or in-combination with other plans.

1.2 Habitats Regulations of plans generally

The BBNPA is a competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), commonly referred to as the Habitats Regulations and must assess the Plan, before it is put into effect, as a matter of law (Regulation 63).

This assessment is generally referred to as a 'Habitats Regulations Assessment' or 'HRA' and the regulations set out a clearly defined stepwise process which must be followed.

Under the regulations, HRA is required in respect of both 'plans' and 'projects'. Where a project is subject to assessment, there is generally sufficiently detailed project specific information against which to make a comprehensive assessment.

However, a plan-based assessment is different; The Plan sets out broad intentions and lacking information which is available when a detailed projects are developed (this may not be until after the Plan has been published).

As such, the HRA of a 'plan' is recognised to require a different approach to that of a 'project' and is tailored to the plan being assessed; assessments are made to the extent possible on the basis of the precision of the plan, but such an assessment cannot do more than the level of detail of the plan at that stage permits.

Although plans are capable of significantly affecting Special Areas of Conservation ("SAC") and therefore the National Sites Network (formerly 'European sites'), elements of a plan that are no more than general policy statements or which express the general political will of an authority cannot, generally, be likely to have a significant effect on a site.

2. The screening assessment

This HRA follows the guidance set out in *The Habitats Regulations Assessment Handbook* hereafter referred to as ‘The HRA Handbook’ and is based on the use of screening categories. (Tyldesley, D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook*, January 2021 edition UK: DTA Publications Ltd.).

The HRA Handbook states:

‘It is acknowledged that in plan assessment or in considering options at an early stage the scanning and selection process may need to be quite ‘coarse grained’, due to the lack of information about the precise nature of what may be proposed in the plan and how it might affect the qualifying features.’

‘...In almost all cases a scan of such sites will enable an appropriate ‘short-list’ of sites potentially affected to be drawn up, from which the final list of sites to be included in the assessment can be selected after considering the relevant information. Selection of the sites is an iterative process, considering and reconsidering information and effects as understanding and information improve, until there is a satisfactory degree of confidence that all sites potentially adversely affected have been selected....’

‘... If there is no causal connection or link between the plan’s proposals and the site’s qualifying features there cannot be an effect. If there is a ‘theoretical’ pathway, or ‘hypothetical’ cause, but in practice there is no credible evidence of a real rather than a hypothetical link to the site, it cannot be regarded as being potentially significant, either alone or in combination with other plans or projects. There is no point including that supposition in further assessment.’

To focus the assessment, it is important to identify those sites where there is credible evidence of a real risk sites from the Plan as currently drafted.

Appendix I is a table containing the longlist of sites considered by this assessment (where at least part of the SAC is within 15km of the National Park boundary). The table also sets out the qualifying features and provides links to the conservation objectives as set out in the Core Management Plans for each of the SACs.

Having identified the longlist and examined the issues, sites outside the National Park are omitted from the short list of sites potentially affected. The only hypothetical pathway identified was *Air Pollution: Nitrogen Deposition* for which there is no credible evidence of a real link between the Plan and the sites.

Twelve sites are shortlisted as potentially affected:

- Blaen Cynon SAC
- Brecon Beacons SAC
- Coedydd Nedd a Mellte SAC
- Coed y Cerrig SAC
- Cwm Cadlan SAC
- Cwm Clydach Woodlands SAC
- Llangorse Lake/ Llyn Syfaddan SAC
- River Usk SAC
- River Wye SAC
- Sugar Loaf Woodlands SAC
- Usk Bat Sites SAC
- River Tywi SAC

Table I summarises the mechanisms for impacts.

Potential mechanisms for impacts are summarised as follows:	
Potential effects	Further comment
All sites within plan area	These sites are recognised as being within the plan area, or are located in part or wholly within a 15km radius of the National Park meaning the potential for proximity related effects to occur should be taken into account. Such effects will only reasonably be identifiable in respect of geographically specific policies.
Effects on mobile species	This recognises the potential for species to be impacted within land or sea out-with the boundary of a designated site, but functionally connected to the population for which the site has been designated.
Recreational pressure	This impact mechanism is directly related to changes in recreational activities and usage patterns.
Light/noise disturbance	This impact mechanism is directly related to changes in land use which might generate light pollution or additional noise.
INNS	This impact mechanism is indirectly related to changes in recreational activities and usage patterns.

Table I. Potential mechanisms for impacts on the shortlisted sites.

2.1 Screening the Management Plan for a likelihood of significant effects

Having identified the sites which might potentially be affected, the screening stage considers each aspect of the Plan to identify whether it is:

1. Exempt from the need for assessment (where a plan is directly connected with or necessary for the management of the site concerned);
2. Excluded from the need for assessment (where a document under consideration is not a 'plan' within the context of the Habitats Regulations);
3. Eliminated from the need for assessment (where it is obvious from the beginning that there is no conceivable effect upon any of the sites);
4. Subject to assessment and screened out from further consideration (that is the case where an aspect of the plan is considered not 'likely to have a significant effect on a site, either alone or in combination with other plans and projects'); or,
5. Subject to assessment and screened in for further assessment (that is the case where an aspect of the plan is considered 'likely to have a significant effect on a site, either alone or in combination with other plans and projects')

For elements of the Plan which are subject to assessment, the screening test requires a determination as to whether there would be a 'likely significant effect on a site, either alone or in combination with other plans and projects', or not.

2.2 Screening the introductory sections of the Management Plan

The introductory sections include background and contextual information, identify the special qualities of the National Park and Plan objectives, and make statements about the ways of working which are envisaged to implement the Plan. These elements of the Plan cannot conceivably have any effects on a site and have been screened out of further assessment (*Clause 3. Eliminated from the need for assessment (where it is obvious from the beginning that there is no conceivable effect upon any of the sites).*)

2.3 Screening the policies of the Management Plan

Used to screen the draft Plan policies, the 'Screening categories', taken from Part F of the HRA Handbook, are as follows:

- A. General statement of policy / general aspiration (screened out).
- B. Policy listing general criteria for testing the acceptability / sustainability of proposals (screened out).
- C. Proposal referred to but not proposed by the plan (screened out).
- D. Plan-wide environmental protection / site safeguarding policy (screened out).

- E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out).
- F. Policy that cannot lead to development or other change (screened out).
- G. Policy or proposal that could not have any conceivable effect on a site (screened out).
- H. Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects) (screened out).
- I. Policy or proposal which may have a significant effect on a site alone (screened in)
- J. Policy or proposal with an effect on a site but unlikely to be significant alone, so need to check for likely significant effects in combination
- K. Policy or proposal unlikely to have a significant effect either alone or in combination (screened out after the in combination test).
- L. Policy or proposal which might be likely to have a significant effect in combination (screened in after the in combination test).
- M. Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a site (screened in).

2.4 Screening conclusions

All 'policies' were screened against these categories; details of which are provided in Appendix 2. Having screened the Plan policies against the screening categories from the HRA Handbook, all policies have been screened out of the need for further assessment reflecting the nature, drafting and purpose of Plan objectives and policies (Clause 4 - *Subject to assessment and screened out from further consideration (that is the case where an aspect of the plan is considered not 'likely to have a significant effect on a site, either alone or in combination with other plans and projects).*

The Plan concerns the management of the National Park and, given the wide responsibilities and duties which apply to the National park, it is anticipated that a management plan will generally be concerned with activities which are positive or neutral in terms of conserving and enhancing the natural beauty, wildlife and cultural heritage features.

The objectives and associated policies are framed as high-level strategic aspirations which lack the level of specificity available at project development stage. It is therefore not possible to identify how the implementation of the policies across the National Park might reasonably generate risks to individual sites.

National Park Authority staff are familiar with balancing the enjoyment of the National Park by visitors with the overarching purposes. The level of involvement by staff with the way that the National Park is utilised, together with their experience in managing visitor pressure, provides the objective information upon which the assessment has been conducted.

Noting that it is not included in the Plan in response to any identified inherent risks to any particular designated site, it is important that appropriate text providing protection for the National Sites Network ‘either alone or in combination with other plans and projects’ is included in the Plan, highlighting the protection afforded to designated sites by the relevant legislative frameworks which apply.

It is therefore the conclusion of this HRA that, with reference to the proposed additional text, and on the assumption that it is incorporated into any **final** version of the plan, the Plan will have no adverse effect on the integrity of any SAC identified in table I.

2.5 The need for further assessment in combination with other plans and projects

The nature of the Plan limits the extent to which its effects can be subject to assessment under the Habitats Regulations. Such an assessment cannot do more than the level of detail available at that stage permits. For instance, there is no detailed timeframe within which any policy may be implemented, and the potential for in combination effects to arise with other plans and projects cannot reasonably be subject to any meaningful assessment at this stage.

All policies were screened out against categories which conclude no likely significant effect either alone or in combination. This is on the basis that the policies will have no effects (or no conceivable effects) on SAC and such policies cannot therefore act in combination with other plans and projects meaning no in combination assessment work is required.

The requirement for any proposed scheme to be subject to assessment alone and in combination with other plans and projects prior to implementation means that in combination effects will be subject to assessment at a later stage, when sufficient detail is available to enable the assessment to be undertaken in a meaningful manner.

2.6 Overall conclusion

The draft Plan has been subject to screening under the Habitats Regulations and has been considered in respect of the potential for likely significant effects upon any site identified in Appendix I of this document, either alone or in combination with other plans and projects.

Following a preliminary screening, all aspects of the plan were screened as having no likely significant effect, either alone or in combination. The Plan will have no adverse effect on the integrity of any SAC identified on the shortlist of sites identified as potentially being affected.

This outcome is not surprising given:

- The statutory purpose of the National Park and the Plan;

- The statutory obligations of BBNPA;
- That BBNPA is party to a statement of confirmation made to the International Union for Conservation of Nature (IUCN); the statement being the basis on which the Brecon Beacons National Park is recognised as a Category V protected area and included on the world database of protected areas; and,
- The exceptionally high standards of ecological expertise maintained within the staff body of the National Park Authority.

Appendix I. Longlist of sites considered by this assessment (where at least part of the SAC is within 15km of the National Park boundary).

	European site	Scanning and site selection
1	<p>Aberbargoed Grasslands SAC</p> <p>Primary Broad Natura 2000 Category: Grassland/heathland</p> <p>Core management plan/ conservation objectives Link</p>	<p>The National Park is beyond the recommended 2km buffer for its mobile designated feature, the Marsh fritillary butterfly. Aberbargoed Grasslands SAC is also designated for its Purple moor-grass meadows habitat.</p> <p>Natural Resources Wales’ report <i>Natura 2000 Thematic Action Plan Air Pollution: Nitrogen Deposition (2015)</i> identifies both features as being among those most frequently adversely affected by air pollution (Table 1, page 9).</p> <p>Section 8 of the report describes the proposed strategic actions required to manage and address impacts from air pollution on Natura 2000 features.</p> <p>Appendix C of the report outlines possible measures and potential delivery mechanisms that could reduce nitrogen deposition on sensitive habitats within protected sites and in the wider countryside identified by the Defra Remedies for Air Pollution Impacts on Designated Sites (RAPIDS) 19 project.</p> <p>These relate to one or more of the following scenarios agriculture (diffuse and point source), non-agricultural point sources such as industrial plants, combustion/power generation or waste processing sites, emissions originating from large numbers motor vehicles; wet deposition from medium to long range transport (which may need national scale or international scale interventions to achieve significant reductions in N impacts).</p>
2	<p>Blaen Cynon SAC</p> <p>Primary Broad Natura 2000 Category: Grassland/heathland</p> <p>Secondary Natura 2000 category or categories: Bog</p>	<p>The Blaen Cynon SAC is designated for the Marsh fritillary butterfly. The SAC is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Climate Change and Habitat Fragmentation (2015) • Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Man-made Changes to Hydraulic Conditions (2015) • Cross-Cutting Action Plans (2015)

	Core management plan/ conservation objectives Link	
3	<p>Brecon Beacons SAC</p> <p>Primary Broad Natura 2000 Category: Upland</p> <p>Secondary Natura 2000 category or categories: Grassland/heathland</p> <p>Core management plan/ conservation objectives Link</p>	<p>The Brecon Beacons SAC is designated for the following habitats:</p> <ul style="list-style-type: none"> • Dry heaths. • Plants in crevices in base-rich rocks. • Plants in crevices on acid rocks. • Tall herb communities. <p>The SAC is located within an area of open access land; which is heavily visited and is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Access and Recreation Management (2015) • Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015)
4	<p>Cernydd Carmel SAC</p> <p>Primary Broad Natura 2000 Category: Grassland/heathland</p> <p>Secondary Natura 2000 category or categories: Bog</p>	<p>The site is entirely outside the Brecon Beacons National Park and has no mobile designated features. Cernydd Carmel SAC is designated for its:</p> <ul style="list-style-type: none"> • Active raised bogs. • Dry heaths. • Wet heathland with cross-leaved heath. • Mixed woodland on base-rich soils associated with rocky slopes. • Turloughs. <p>Natural Resources Wales' report Natura 2000 Thematic Action Plan Air Pollution: Nitrogen Deposition (2015) identifies those features identified in bold above as being adversely affected (or having the potential to be adversely affect) by air pollution on sites (Appendix B).</p>

	<p>Core management plan/ conservation objectives Link</p>	<p>Section 8 of the report describes the proposed strategic actions required to manage and address impacts from air pollution on Natura 2000 features.</p> <p>Appendix C of the report outlines possible measures and potential delivery mechanisms that could reduce nitrogen deposition on sensitive habitats within protected sites and in the wider countryside identified by the Defra Remedies for Air Pollution Impacts on Designated Sites (RAPIDS) 19 project.</p> <p>These relate to one or more of the following scenarios agriculture (diffuse and point source), non-agricultural point sources such as industrial plants, combustion/power generation or waste processing sites, emissions originating from large numbers motor vehicles; wet deposition from medium to long range transport (which may need national scale or international scale interventions to achieve significant reductions in N impacts).</p>
5	<p>Coedydd Nedd a Mellte SAC</p> <p>Primary Broad Natura 2000 Category: Grassland/heathland</p> <p>Secondary Natura 2000 category or categories: Woodland</p> <p>Core management plan/ conservation objectives Link</p>	<p>The Coedydd Nedd a Mellte SAC is designated for the following habitats:</p> <ul style="list-style-type: none"> • Mixed woodland on base-rich soils associated with rocky slopes. • Western acidic oak woodland. <p>The SAC is located within an area promoted as ‘Waterfall Country’ and is heavily visited. The SAC is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Access and Recreation Management (2015) • Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Woodland Management (2015)
6	<p>Coed y Cerrig SAC</p>	<p>The Coed y Cerrig SAC is designated for its Alder woodland on floodplains habitat.</p>

	<p>Primary Broad Natura 2000 Category: Alluvial forest</p> <p>Core management plan/ conservation objectives Link</p>	<p>The SAC is also a National Nature Reserve is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Invasive Species and Pathogens (2015) • Man-made Changes to Hydraulic Conditions (2015) • Woodland Management (2015)
7	<p>Cwm Cadlan SAC</p> <p>Primary Broad Natura 2000 Category: Grassland/heathland</p> <p>Secondary Natura 2000 category or categories: Bog</p> <p>Core management plan/ conservation objectives Link</p>	<p>The Cwm Cadlan SAC is designated for the following habitats:</p> <ul style="list-style-type: none"> • Calcium-rich springwater-fed fens. • Purple moor-grass meadows. <p>Although not a honey-pot site, the SAC is located partially within a National Nature Reserve and is crossed by Public Rights of Way leading to open access land with significant historic environment interest (Mynydd-y-Glog).</p> <p>The SAC is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Man-made Changes to Hydraulic Conditions (2015)
8	<p>Cwm Doeithe Mynydd Mallaen SAC</p> <p>Primary Broad Natura 2000 Category: Woodland</p>	<p>The site is entirely outside the Brecon Beacons National and has no mobile designated features. Cwm Doeithe Mynydd Mallaen SAC is designated for its:</p> <ul style="list-style-type: none"> • Dry heaths. • Western acidic oak woodland. <p>Natural Resources Wales' report Natura 2000 Thematic Action Plan Air Pollution: Nitrogen Deposition (2015) identifies those features identified in bold above as being adversely affected (or having the potential to be adversely affect) by air pollution on sites (Appendix B).</p>

	<p>Secondary Natura 2000 category or categories: Grassland/ Heathland</p> <p>Core management plan/ conservation objectives Link</p>	<p>Section 8 of the report describes the proposed strategic actions required to manage and address impacts from air pollution on Natura 2000 features.</p> <p>Appendix C of the report outlines possible measures and potential delivery mechanisms that could reduce nitrogen deposition on sensitive habitats within protected sites and in the wider countryside identified by the Defra Remedies for Air Pollution Impacts on Designated Sites (RAPIDS) 19 project.</p> <p>These relate to one or more of the following scenarios agriculture (diffuse and point source), non-agricultural point sources such as industrial plants, combustion/power generation or waste processing sites, emissions originating from large numbers motor vehicles; wet deposition from medium to long range transport (which may need national scale or international scale interventions to achieve significant reductions in N impacts).</p>
9	<p>Cwm Clydach Woodlands SAC</p> <p>Primary Broad Natura 2000 Category: Woodland</p> <p>Secondary Natura 2000 category or categories: Grassland/ Heathland</p> <p>Core management plan/ conservation objectives Link</p>	<p>The Cwm Clydach Woodlands SAC is designated for the following habitats:</p> <ul style="list-style-type: none"> • Beech forests on acid soils. • Beech forests on neutral to rich soils. <p>The SAC is located partially within a National Nature Reserve and is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Access and Recreation Management (2015) • Invasive Species and Pathogens (2015) • Woodland Management (2015)
10	<p>Drostre Bank SAC</p>	<p>The site is entirely outside the Brecon Beacons National and has no mobile designated features. Drostre Bank SAC is designated for its:</p> <ul style="list-style-type: none"> • Alder woodland on floodplains.

	<p>Primary Broad Natura 2000 Category: Grassland/heathland</p> <p>Secondary Natura 2000 category or categories: Woodland</p> <p>Core management plan/ conservation objectives Link</p>	<ul style="list-style-type: none"> • Purple moor-grass meadows. <p>Natural Resources Wales’ report Natura 2000 Thematic Action Plan Air Pollution: Nitrogen Deposition (2015) identifies those features identified in bold above as being adversely affected (or having the potential to be adversely affect) by air pollution on sites (Appendix B).</p> <p>Section 8 of the report describes the proposed strategic actions required to manage and address impacts from air pollution on Natura 2000 features.</p> <p>Appendix C of the report outlines possible measures and potential delivery mechanisms that could reduce nitrogen deposition on sensitive habitats within protected sites and in the wider countryside identified by the Defra Remedies for Air Pollution Impacts on Designated Sites (RAPIDS) 19 project.</p> <p>These relate to one or more of the following scenarios agriculture (diffuse and point source), non-agricultural point sources such as industrial plants, combustion/power generation or waste processing sites, emissions originating from large numbers motor vehicles; wet deposition from medium to long range transport (which may need national scale or international scale interventions to achieve significant reductions in N impacts).</p>
11	<p>Llangorse Lake/ Llyn Syfaddan SAC</p> <p>Primary Broad Natura 2000 Category: Lake</p> <p>Core management plan/ conservation objectives Link</p>	<p>The Llangorse Lake/ Llyn Syfaddan SAC is designated as a freshwater habitat; a naturally nutrient-rich lakes or lochs which are often dominated by pondweed. The lake is located within an area promoted as a tourist destination and is heavily visited.</p> <p>The SAC is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Access and Recreation Management (2015) • Diffuse Water Pollution (2015) • Plan Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Man-made Changes to Hydraulic Conditions (2015)
12	<p>Mynydd Epynt SAC</p>	<p>The site is entirely outside the Brecon Beacons National and has no mobile designated features. Mynydd Epynt SAC is designated for its Slender green feather-moss.</p>

	<p>Primary Broad Natura 2000 Category: Upland</p> <p>Core management plan/ conservation objectives Link</p>	<p>Natural Resources Wales' report Natura 2000 Thematic Action Plan Air Pollution: Nitrogen Deposition (2015) identifies those features identified in bold above as being adversely affected (or having the potential to be adversely affect) by air pollution on sites (Appendix B).</p> <p>Section 8 of the report describes the proposed strategic actions required to manage and address impacts from air pollution on Natura 2000 features.</p> <p>Appendix C of the report outlines possible measures and potential delivery mechanisms that could reduce nitrogen deposition on sensitive habitats within protected sites and in the wider countryside identified by the Defra Remedies for Air Pollution Impacts on Designated Sites (RAPIDS) 19 project.</p> <p>These relate to one or more of the following scenarios agriculture (diffuse and point source), non-agricultural point sources such as industrial plants, combustion/power generation or waste processing sites, emissions originating from large numbers motor vehicles; wet deposition from medium to long range transport (which may need national scale or international scale interventions to achieve significant reductions in N impacts).</p>
13	<p>River Usk SAC</p> <p>Primary Broad Natura 2000 Category: Riparian</p> <p>Core management plan/ conservation objectives Link</p>	<p>Part of the River Usk SAC and its catchment are within the National Park. It is designated for:</p> <ul style="list-style-type: none"> • Allis shad. • Atlantic salmon. • Brook lamprey. • Bullhead. • Otter. • River lamprey. • Rivers with floating vegetation often dominated by water-crowfoot. • Sea lamprey. • Twaite shad. <p>The SAC is within the National Park and is closely connected with (is fed by and receives overflow from) the Monmouthshire and Brecon Canal. Some of its upper tributaries are dammed and provide water for Swansea and Newport. Furthermore, settlements including Sennybridge, Brecon and Crickhowell are on the Usk.</p>

		<p>The SAC is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Invasive Species and Pathogens (2015) • Diffuse Water Pollution (2015) • Man-made Changes to Hydraulic Conditions (2015) • Woodland Management (2015) <p>It is also likely that matters relating to Access and Recreation Management are relevant.</p> <p>Water quality in the river is currently exceeding critical limits (phosphates) demonstrating existing in combination impacts within the catchment are harming the designation. Evidence: NRW Evidence Report 489 (January 2021).</p>
14	<p>River Wye SAC</p> <p>Primary Broad Natura 2000 Category: Riparian</p> <p>Secondary Natura 2000 category or categories: Bog</p> <p>Core management plan/ conservation objectives Link</p>	<p>Part of the River Wye SAC and its catchment are within the National Park. It is designated for:</p> <ul style="list-style-type: none"> • Allis shad. • Atlantic salmon. • Brook lamprey. • Bullhead. • Otter. • River lamprey. • Rivers with floating vegetation often dominated by water-crowfoot. • Sea lamprey. • Twaite shad. • Very wet mires often identified by an unstable `quaking` surface. • White-clawed (or Atlantic stream) crayfish. <p>The SAC is partly within the National Park and is hydrologically connected with Llangros Lake and the settlements of Talgarth and Hay-on-Wye.</p> <p>The SAC is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p>

		<ul style="list-style-type: none"> • Access and Recreation Management (2015) • Diffuse Water Pollution (2015) • Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Man-made Changes to Hydraulic Conditions (2015) • Woodland Management (2015) <p>Water quality in the river is currently exceeding critical limits (phosphates) demonstrating existing in combination impacts within the catchment are harming the designation. Evidence: NRW Evidence Report 489 (January 2021).</p>
15	<p>Sugar Loaf Woodlands SAC Woodland Primary Broad Natura 2000 Category: Core management plan/ conservation objectives Link</p>	<p>The Sugar Loaf Woodlands SAC is designated for its Western acidic oak woodland habitat. The SAC is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Woodland Management (2015)
16	<p>Usk Bat Sites SAC Primary Broad Natura 2000 Category: Bats Secondary Natura 2000 category or categories: Grassland/ heathland, Bogs, Upland</p>	<p>The Usk Bat Sites SAC is designated for the following habitats and species.</p> <ul style="list-style-type: none"> • Blanket bog. • Caves not open to the public. • Degraded raised bog. • Dry heaths. • Lesser horseshoe bat. • Mixed woodland on base-rich soils associated with rocky slopes. • Plants in crevices in base-rich rocks. <p>The SAC is large (1686.025 Ha.) and range of the lesser horseshoe bat (suggested buffer of 15km. Schofield, H. (2010) Lesser Horseshoe Conservation Handbook. Bat Conservation Trust).</p>

	<p>Core management plan/ conservation objectives Link</p>	<p>The SAC is recorded as having an issues relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Thematic Action Plan Access and Recreation Management (2015) • Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Man-made Changes to Hydraulic Conditions (2015) • Woodland Management (2015) <p>Whilst the draft National Park Management Plan includes policies which complement potential delivery mechanisms that could reduce these adverse effects, or risk of them occurring, a Likely Significant Effect cannot be ruled out as the draft National Park Management Plan directs as yet uncertain interventions towards the area.</p>
17	<p>Rhos Goch SAC</p> <p>Primary Broad Natura 2000 Category: Bog</p> <p>Secondary Natura 2000 category or categories: Grassland</p> <p>Core management plan/ conservation objectives Link</p>	<p>The site is entirely outside the Brecon Beacons National and has no mobile designated features. Rhos Goch SAC is designated for its:</p> <ul style="list-style-type: none"> • Active raised bogs. • Alder woodland on floodplains. • Bog woodland. • Purple moor-grass meadows. • Very wet mires often identified by an unstable `quaking` surface. <p>Natural Resources Wales' report <i>Natura 2000 Thematic Action Plan Air Pollution: Nitrogen Deposition (2015)</i> identifies those features identified in bold above as being adversely affected (or having the potential to be adversely affect) by air pollution on sites (Appendix B).</p> <p>Section 8 of the report describes the proposed strategic actions required to manage and address impacts from air pollution on Natura 2000 features.</p> <p>Appendix C of the report outlines possible measures and potential delivery mechanisms that could reduce nitrogen deposition on sensitive habitats within protected sites and in the wider countryside identified by the Defra Remedies for Air Pollution Impacts on Designated Sites (RAPIDS) 19 project.</p>

		<p>These relate to one or more of the following scenarios agriculture (diffuse and point source), non-agricultural point sources such as industrial plants, combustion/power generation or waste processing sites, emissions originating from large numbers motor vehicles; wet deposition from medium to long range transport (which may need national scale or international scale interventions to achieve significant reductions in N impacts).</p>
18	<p>River Tywi SAC</p> <p>Primary Broad Natura 2000 Category: Riparian</p> <p>Core management plan/ conservation objectives Link</p>	<p>Part of the River Tywi SAC and its catchment are within the National Park. It is designated for</p> <ul style="list-style-type: none"> • Allis shad. • Brook lamprey. • Bullhead. • Otter. • River lamprey. • Sea lamprey. • Twaite shad. <p>The SAC is recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p> <ul style="list-style-type: none"> • Diffuse Water Pollution (2015) • Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Man-made Changes to Hydraulic Conditions (2015) <p>Water quality in the river is not optimal, existing impacts within the catchment are harming the designation. Evidence: NRW Evidence Report 489 (January 2021).</p>

Appendix 2: Screening conclusions

Used to screen the draft Plan policies, the ‘Screening categories’, taken from Part F of the HRA Handbook, are as follows:

- A. General statement of policy / general aspiration (screened out).
- B. Policy listing general criteria for testing the acceptability / sustainability of proposals (screened out).
- C. Proposal referred to but not proposed by the plan (screened out).
- D. Plan-wide environmental protection / site safeguarding policy (screened out).
- E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out).
- F. Policy that cannot lead to development or other change (screened out).
- G. Policy or proposal that could not have any conceivable effect on a site (screened out).
- H. Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects) (screened out).
- I. Policy or proposal which may have a significant effect on a site alone (screened in)
- J. Policy or proposal with an effect on a site but unlikely to be significant alone, so need to check for likely significant effects in combination
- K. Policy or proposal unlikely to have a significant effect either alone or in combination (screened out after the in combination test).
- L. Policy or proposal which might be likely to have a significant effect in combination (screened in after the in combination test).
- M. Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a site (screened in).

Draft policy	Screening category and justification
<p>Active Travel</p> <p>We will create a national park-wide cycling and walking network which helps create a healthier, better national park, which is more economically-robust with revitalised town centres, which is more socially just and which provides people a real and attractive alternative to driving when they need to get about in the national park.</p>	<p>A. General statement of policy / general aspiration (screened out).</p> <p>C. Proposal referred to but not proposed by the plan (screened out).</p> <p>D. Plan-wide environmental protection / site safeguarding policy (screened out).</p> <p>E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out).</p>
<p>Busy Places</p> <p>Busy places will be actively managed to ensure that visitors to the Park can enjoy and engage with the special qualities without harm to the resident communities or the natural and historic environment.</p>	<p>A. General statement of policy / general aspiration (screened out).</p> <p>C. Proposal referred to but not proposed by the plan (screened out).</p>

<p>Climate Change</p> <p>The actions of this plan commit all of those who have a stake in the Park to address the climate crisis. This commitment requires to reach near zero or zero carbon by 2039.</p> <p>Alignment with the Paris Agreement, will require the National Park to stay within a maximum cumulative carbon dioxide emissions budget of 1,557 thousand tonnes (ktCO₂) for the period of 2020 to 2100.</p>	<p>A. General statement of policy / general aspiration (screened out). D. Plan-wide environmental protection / site safeguarding policy (screened out). E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out).</p>
<p>Dark Skies</p> <p>We will protect and enhance the night time environment and our dark skies so that current and future generations can experience the wonder and tranquillity of a truly dark sky, and to benefit wildlife and human health.</p>	<p>A. General statement of policy / general aspiration (screened out). D. Plan-wide environmental protection / site safeguarding policy (screened out). E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out). G. Policy or proposal that could not have any conceivable effect on a site (screened out). H. Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects) (screened out).</p>
<p>Geopark</p> <p>The Geopark will deliver outcomes that benefit health and wellbeing and support tourism-led regeneration at appropriate locations in partnership with a range of stakeholders from the public and private sectors.</p>	<p>A. General statement of policy / general aspiration (screened out).</p>
<p>Green New Deal</p> <p>To address the climate and nature emergencies, a new approach is needed to the rural economy. In order to ensure the future resilience and prosperity of local communities, we will collaborate with partners to support transition to a new and more sustainable economy.</p>	<p>A. General statement of policy / general aspiration (screened out).</p>
<p>Health and Wellbeing</p>	

<p>The environment of the Brecon Beacons will be recognised and utilised for the many benefits it can bring to human mental & physical health and general well-being.</p>	<p>A. General statement of policy / general aspiration (screened out).</p>
<p>Historic Environment</p> <p>We will ensure that the historic environment is managed in line with the best principles of conservation management. In so doing we aim to</p> <p>Foster peoples' values towards and understanding of heritage so it may be celebrated for its intrinsic value, for its health and wellbeing benefits and as a source of inspiration, learning and engagement; AND</p> <p>Support inclusive and accessible ways to becoming involved in projects to manage, research, monitor, celebrate and benefit from the beautiful and varied character of the historic environment and heritage.</p>	<p>A. General statement of policy / general aspiration (screened out). H. Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects) (screened out).</p>
<p>Landscape</p> <p>The landscape is vital to all that we are as a National Park. We will in all our endeavours work to guide and harmonise necessary changes in the landscape to ensure that the essence remains strong and vital.</p> <p>We will act to conserve and enhance landscape features which have intrinsic value due to their geological geomorphological, ecological, heritage or aesthetic value.</p>	<p>A. General statement of policy / general aspiration (screened out). D. Plan-wide environmental protection / site safeguarding policy (screened out).</p>
<p>Local Food</p>	
<p>We will help establish and grow a strong local food economy. We will help diversify the variety of food produced within the Brecon Beacons and make it easier for local people to purchase food</p>	<p>A. General statement of policy / general aspiration (screened out).</p>

produced in the area at an affordable price for the benefit of the local environment and economy.	
Nature Recovery	
We will reverse the decline in biodiversity by focussing on developing resilient ecological networks which are more diverse, greater in extent, in better ecological condition and better joined up.	A. General statement of policy / general aspiration (screened out). D. Plan-wide environmental protection / site safeguarding policy (screened out). E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out).
Outreach	
We believe that the National Park should be a landscape for all. We will work with the communities on our boundaries to address all and any barriers to access to make the Park a welcoming and widely utilised resource for all.	A. General statement of policy / general aspiration (screened out).
Partnership Working	
To realise the vision and aspirations for the National Park, we want to work in successful partnerships.	A. General statement of policy / general aspiration (screened out). F. Policy that cannot lead to development or other change (screened out). G. Policy or proposal that could not have any conceivable effect on a site (screened out).
Peatlands	
This plan champions the restoration of Peatland across the Park for its ecological value and for the contribution towards climate change reversal. We will deliver the Brecon Beacons National Park peatland restoration strategy and assist with those of our partners.	A. General statement of policy / general aspiration (screened out). C. Proposal referred to but not proposed by the plan (screened out). E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out).
Payments for Ecosystem Services	
We will develop a portfolio of projects generating payments for Ecosystem Services.	A. General statement of policy / general aspiration (screened out).
Resilient Communities	

The communities within the National Park will be vibrant, sustainable and most importantly great places to live.	A. General statement of policy / general aspiration (screened out).
Rights of Way	
We will ensure that the rights of way network and access land is more accessible to more users, well connected and resilient to all future demands placed on it.	A. General statement of policy / general aspiration (screened out).
Rural Skills	
We will ensure that rural skills are maintained, retained and enhanced within the Brecon Beacons. We will create active partnerships in the development of a green workforce training scheme which utilises rural skills to take action against the climate and biodiversity crises.	A. General statement of policy / general aspiration (screened out). F. Policy that cannot lead to development or other change (screened out). G. Policy or proposal that could not have any conceivable effect on a site (screened out).
Sustainable Tourism	
We will enable positive visitor experiences which mutually benefit our communities, nature recovery and climate change adaptation across the Park.	A. General statement of policy / general aspiration (screened out).
Treescaping	
We will promote, with partners, a landscape rich in trees and woods, with better woodland management, restored ancient woodland and more trees to deliver the many social and ecological benefits trees bring.	A. General statement of policy / general aspiration (screened out). C. Proposal referred to but not proposed by the plan (screened out). E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out).
Water	
Across the National Park we will restore healthy naturally functioning catchments floodplains and rivers - providing clean water, recreation opportunities, mitigating flooding and alive with wildlife.	A. General statement of policy / general aspiration (screened out). E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out). F. Policy that cannot lead to development or other change (screened out). G. Policy or proposal that could not have any conceivable effect on a site (screened out). H. Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects) (screened out).

Human Capital	
We will develop a Park rich in human capital.	A. General statement of policy / general aspiration (screened out). F. Policy that cannot lead to development or other change (screened out). G. Policy or proposal that could not have any conceivable effect on a site (screened out).
Volunteers	
We will expand opportunities for volunteers to work with the Authority and partner organisations for mutual benefit.	A. General statement of policy / general aspiration (screened out). F. Policy that cannot lead to development or other change (screened out). G. Policy or proposal that could not have any conceivable effect on a site (screened out).