

Habitats Regulations Assessment of the National Park Management Plan for National Park Authority

22nd March 2023

1. Relevant background and introduction

Bannau Brycheiniog National Park Authority is required to prepare a Management Plan for the Bannau Brycheiniog National Park ("the Plan"). The Plan being developed sets out how the Bannau Brycheiniog National Park 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 conflicts 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 Bannau Brycheiniog National Park 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).

Bannau Brycheiniog National Park 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 Bannau Brycheiniog 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 Bannau Brycheiniog National Park to give a high priority to the conservation of nature in the aims and objectives of the Plan.

The Plan also sets out the Bannau Brycheiniog National Park's well-being objectives; helping to frame the contribution of the Bannau Brycheiniog 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 Bannau Brycheiniog 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 contributions provide the main framework for management interventions.

1.1 Results of 2010 National Park Management Plan Habitats Regulations Assessment

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 Assessments of plans generally

The Bannau Brycheiniog National Park 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 'Habitats Regulations Assessment ' and the regulations set out a clearly defined stepwise process which must be followed.

Under the regulations, Habitats Regulations Assessment 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 is 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 Habitats Regulations Assessment 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 the National Sites Network ('European Sites') - Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar 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 Habitats Regulations Assessment follows the guidance set out in *The Habitats Regulations Assessment Handbook* hereafter referred to as 'The Habitats Regulations Assessment 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 Habitats Regulations Assessment 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 European sites where there is credible evidence of a real risk to sites from the Plan as now proposed.

Appendix 1 is a table containing the longlist of sites considered by this assessment, and includes where at least part of the SAC, SPA or Ramsar is within 15km of the National Park boundary or where the presence of mobile species interest features from sites further afield can also be a factor for inclusion. 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 European Sites.

Having identified the longlist and examined the issues, most sites outside the National Park are omitted from the short list of sites potentially affected. One 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. SAC rivers can also provide impact pathways and the presence of mobile species interest features from sites further afield can also be a factor for consideration.

Thirteen sites are shortlisted as potentially affected:

- Blaen Cynon SAC
- Bannau Brycheiniog 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
- Seven Estuary SAC, SPA and Ramsar site

Table 1 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 1. 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 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 Habitats Regulations Assessment 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 'Missions/Objectives' were screened against these categories; details of which are provided in Appendix 2. Having screened the Plan policies against the screening categories from the Habitats Regulations Assessment 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 Missions and associated objectives 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 Plan 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 Habitats Regulations Assessment 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 Likely Significant Effects on any European site identified in table 1. Stage 2 of the Habitats Regulations Assessment process - an Appropriate Assessment - is therefore not required.

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 statements of policy 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 European Sites and such policies cannot therefore act in combination with other plans and projects, meaning no in combination assessment work is required for the Plan.

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. High-level plans that are likely to require assessment in-combination at lower tier levels, may include neighbouring Local Development Plans, overlapping River Basin Management Plans, and any other relevant plans. A statement is included within the Plan to make this need explicit.

2.6 Overall conclusion

The 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 1 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, 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 Bannau Brycheiniog National Park Authority;
- That Bannau Brycheiniog National Park 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 Bannau Brycheiniog 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 1. Longlist of sites considered by this assessment (where at least part of the SAC is within 15km of the National Park boundary).

	Special Area of Conservation	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>Core management plan/ conservation objectives Link</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)
3	<p>Bannau Brycheiniog SAC</p> <p>Primary Broad Natura 2000 Category: Upland</p> <p>Secondary Natura 2000 category or categories: Grassland/heathland</p>	<p>The Bannau Brycheiniog 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)

	Core management plan/ conservation objectives Link	
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>Core management plan/ conservation objectives Link</p>	<p>The site is entirely outside the Bannau Brycheiniog 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>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>Primary Broad Natura 2000 Category: Alluvial forest</p> <p>Core management plan/ conservation objectives Link</p>	<p>The Coed y Cerrig SAC is designated for its Alder woodland on floodplains habitat.</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>The Cwm Cadlan SAC is designated for the following habitats:</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>	<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>Secondary Natura 2000 category or categories: Grassland/ Heathland</p>	<p>The site is entirely outside the Bannau Brycheiniog 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>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>Core management plan/ conservation objectives Link</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>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 site is entirely outside the Bannau Brycheiniog 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. • 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>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)

	Core management plan/ conservation objectives Link	<ul style="list-style-type: none"> • Diffuse Water Pollution (2015) • Plan Grazing and Livestock Management (2015) • Invasive Species and Pathogens (2015) • Man-made Changes to Hydraulic Conditions (2015)
12	Mynydd Epynt SAC Primary Broad Natura 2000 Category: Upland Core management plan/ conservation objectives Link	<p>The site is entirely outside the Bannau Brycheiniog National and has no mobile designated features. Mynydd Epynt SAC is designated for its Slender green feather-moss.</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	River Usk SAC	<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.

	<p>Primary Broad Natura 2000 Category: Riparian</p> <p>Core management plan/ conservation objectives Link</p>	<ul style="list-style-type: none"> • 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	River Wye SAC	<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.

	<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>	<ul style="list-style-type: none"> • 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</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>

	<p>Primary Broad Natura 2000 Category:</p> <p>Core management plan/ conservation objectives Link</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</p> <p>Primary Broad Natura 2000 Category: Bats</p> <p>Secondary Natura 2000 category or categories: Grassland/ heathland, Bogs, Upland</p> <p>Core management plan/ conservation objectives Link</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>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)
17	<p>Rhos Goch SAC</p>	<p>The site is entirely outside the Bannau Brycheiniog National and has no mobile designated features. Rhos Goch SAC is designated for its:</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>	<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>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.

	<p>Core management plan/ conservation objectives Link</p>	<ul style="list-style-type: none"> • 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>
19	<p>Severn Estuary SAC, SPA, Ramsar site</p> <p>Primary Broad Natura 2000 Categories: Estuaries, Subtidal sandbanks, Intertidal mudflats and sandflats, Atlantic salt meadows and Reefs</p> <p>Core management plan/ conservation objectives Link</p>	<p>The Severn Estuary SAC, SPA and Ramsar site are entirely outside the National Park boundary.</p> <p>The SAC is designated for:</p> <ul style="list-style-type: none"> • Estuaries • Subtidal sandbanks • Intertidal mudflats and sandflats • Atlantic salt meadows • Reefs • River lamprey • Sea lamprey • Twaite shad <p>The SPA interest features are:</p> <ul style="list-style-type: none"> • Bewick's swan • European white-fronted goose • Dunlin

		<ul style="list-style-type: none"> • Redshank • Shelduck • Gadwall • Internationally important assemblage of waterfowl <p>Ramsar designated features are:</p> <ul style="list-style-type: none"> • Estuaries • Assemblage of migratory fish species (Sea Lamprey, River Lamprey, Twaite Shad, Allis Shad, Salmon, Sea Trout, Eel) • Bewick's swan • European white-fronted goose • Dunlin • Redshank • Shelduck • Gadwall • Internationally important assemblage of waterfowl <p>The SAC, SPA and Ramsar site are recorded as having an issue relating to (or the potential to adversely affect) site features within the following Natura 2000 Thematic Action Plans:</p>
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Appendix 2: Screening conclusions

Used to screen the draft Plan policies, the 'Screening categories', taken from Part F of the Habitats Regulations Assessment 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).

Mission/Objective	Screening category and justification
Climate Mission	
Reach net-Zero greenhouse gas emissions across the National Park by 2035	A. General statement of policy / general aspiration (screened out).
Water Mission	

Clean, safe, resilient, plentiful water resources and water environments by 2030	A. General statement of policy / general aspiration (screened out).
Nature Mission	
Nature positive Bannau Brycheiniog National Park by 2030	A. General statement of policy / general aspiration (screened out).
People Mission	
Living, working, visiting safely, equitably and sustainably	A. General statement of policy / general aspiration (screened out).
Place Mission	
Beautiful, thriving, prosperous, and sustainable places, celebrated for their cultural heritage, now and forever	A. General statement of policy / general aspiration (screened out).

Mission/Objective	Screening category and justification
Decarbonisation	
The National Park will maximise effort toward or beyond our fair share of action to halve global Emissions by 2030, in line with The Paris agreement's goal of limiting global temperature rises to 1.5 degrees.	<p>A. General statement of policy / general aspiration (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>
Sequestration	
Action will be happening across the national park to restore nature's ability to capture carbon from the atmosphere, in line with the climate change Committee's sixth carbon budget recommendations on Agriculture, land use, land use change and forestry	<p>A. General statement of policy / general aspiration (screened out).</p> <p>D. Plan-wide environmental protection / site safeguarding policy (screened out).</p>

	E. Policies or proposals which steer change in such a way as to protect sites from adverse effects (screened out).
Adaptation	
People and nature will be more resilient to the unavoidable impacts of climate destabilisation, in line with prosperity for all, the climate change adaptation plan for Wales	<p>A. General statement of policy / general aspiration (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>
Resilient catchments	
Resilient catchments supporting the provision of clean and sustainable water resources for the Bannau and beyond	<p>A. General statement of policy / general aspiration (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>
High quality water environments	
High quality water environments ensuring that the health and wellbeing benefits gained from high quality, nature rich, water environments can be experienced by all who live within and visit the Bannau.	<p>A. General statement of policy / general aspiration (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>

Habitat recovery	
All major habitats in the national park, including grassland, native woodland, upland heathland, and peatland, will be on a pathway to net biodiversity gain	<p>A. General statement of policy / general aspiration (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>
Ecosystem management	
Ecosystem functions and ecosystem service generated by the Park are enhanced	<p>A. General statement of policy / general aspiration (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>
Species Conservation	
Flagship species, that are emblematic of the national park or specific habitats are increasing in numbers and extent-- including reintroductions of indigenous species where appropriate consents and safeguards are met	<p>A. General statement of policy / general aspiration (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>
Quality of Life	
Improving the quality of life and well-being for all those who live work and play in the Beacons	<p>A. General statement of policy / general aspiration (screened out).</p>

Future Visitors	
We will have become the torchbearers for sustainable tourism. Visiting the Bannau provides a unique experience, which enhances support for nature recovery, community wellbeing and the local economy. Visitors will know our story and be motivated to help us respond to key challenges, especially through their own actions and behaviour.	A. General statement of policy / general aspiration (screened out).
Welsh language and culture	
Welsh culture is thriving and celebrated as part of the Rich tapestry of cultural lives of Wales. There is an increased awareness and knowledge of the Welsh Language and culture amongst our residents and visitors. Welsh language and culture is loved and valued by all regardless of level of language fluency	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).
Sustainable Businesses	
There will be a support network of businesses dedicated to building a local sustainable and equitable economy within the Bannau	A. General statement of policy / general aspiration (screened out).
Collaborating in Place	
Innovative collaborative action focused on a range of spatial areas to co-produce responses to the nature, climate and economic crises.	A. General statement of policy / general aspiration (screened out).
Ser Y Bannau statements	
Throughout the Plan space has been provided to those working within the Park to showcase their work and demonstrate the type of activity which could help deliver our	A. General statement of policy / general aspiration (screened out). C Proposal referred to but not proposed by the plan (screened out).

<p>missions. In general these statements have been provided by external parties and demonstrate their action/aspirations. The detail implementation of which will require separate processes of consent subject to Habitats Regulations Assessment</p>	
<p>NPA statements of contribution The plan contains a range of statements which define the contributions the NPA seeks to make to the delivery of the Management Plan. These range include the development of partnerships, supporting action planning and evidence gathering/dissemination. Each statement has been considered for its potential impact, alone or in combination, on European Sites. All have been determined to have no LSE in their general aspiration.</p>	<p>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).</p>