

Strategic Environmental Assessment Post Adoption Statement

**Strategic
Environmental
Assessment Post
Adoption Statement
for**

Y Bannau: The Future
The Bannau Brycheiniog (Brecon Beacons) National Park
Management Plan 2023-2028

Adopted

11th April 2023

**Responsible
Authority**

Bannau Brycheiniog (Brecon Beacons) National Park Authority

**Availability of
documents**

Y Bannau: The Future, the Strategic Environmental Assessment
updated Environmental Report and Strategic Environmental
Assessment Post Adoption statement are available at the
National Park Website at

<insert URL when known>

And to inspect free of charge at the National Park Visitor Centre,
Libanus between the hours of 10am and 4pm.

Purpose of the Programme, Plan or Strategy

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 Authority 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 Authority 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 Authority 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 Authority 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 Authority'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).



What prompted the Programme, Plan or Strategy	The National Park Authority has a duty under the Environment Act 1995 to prepare and keep under review a National Park Management Plan for the area.
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Subject	National Park Management
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Period covered	2023-2028
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Frequency of updates	A review is undertaken within 5 years with the development of either an updated National Park Management Plan, or a replacement National Park Management Plan, depending on the finding of the review against monitoring data.
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1. Strategic Environmental Assessment Process (Strategic Environmental Assessment)

1.1 The Management Plan for the Bannau Brycheiniog National Park Authority Area *Y Bannau: The Future* ("The Plan") is the single most important policy document the organisation is charged with producing. The Plan is the vehicle by which all with an interest (statutory or otherwise) in the National Park come together to determine the most critical outcomes for the area.

1.2 In keeping with the significance of the Plan and the potential to have significant environmental impacts or impact on the sustainability of the area, National Park Management Plans are required to be developed through an Strategic Environmental Assessment process. This process includes the following 5 (cyclical) stages:-

- **Scoping** – where key evidence and issues are identified and the scope of the assessment agreed with statutory consultees, including defining sustainability objectives.
- **Assessment** – whereby policies and proposals within The Plan are considered for their impact on defined sustainability objectives, and opportunities arise to refine
- **Consultation** – Findings of the Assessment are published as the Environmental Report for stakeholder feedback
- **Review** – Findings from the consultation are used to refine the assessment process, further assessment is undertaken of any changes arising through consultation.
- **Adoption** (this stage) – The publication of the final report including Statement of Adoption of how the Strategic Environmental Assessment process influenced decision making.
- **Monitoring** – regular monitoring to determine the real-world impacts of the policies and proposals of the Plan as they are delivered. This monitoring may determine the need for early review of the Plan. All monitoring data will eventually feedback into scoping when the time arises for a new plan to be developed.

2. The Strategic Environmental Assessment process of the National Park Management Plan for Y Bannau Brycheiniog.

(a) Scoping In accordance with current guidance for the preparation of National Park Management Plans in Wales *National Park Management Plans Guidance* (CCW, 2007). Bannau Brycheiniog National Park Authority sought to concurrently develop the replacement Local Development Plan (LDP2) with the replacement National Park Management Plan. Accordingly, a joint baseline scoping report was prepared in support of both statutory plans this included

- Baseline data regarding the State of the National Park's natural and cultural environments.

- Links between the National Park Management Plan/Local Development Plan and other relevant policies, plans and programs
- Trend data where available for environmental/cultural indicators to determine the state of the National Park
- The sustainability objectives and method for future assessment

The scope and level of detail of the information to be included in the 'Environmental Report' of: The Bannau Brycheiniog National Park Management Plan 2020 – 2025 and The Bannau Brycheiniog National Park Local Development Plan 2018 – 2033. (Bannau Brycheiniog National Park Authority, October 2020) was published for statutory consultation with National Resources Wales and CADW in January 2021.

(b) Draft Environmental Report A Draft Environmental Report was published for public consultation alongside the draft National Park Management Plan *Future Beacons* from 4th November 2021 to the 4th March 2022. Following consultation, the report was updated summarising the assessment of the finalised Plan incorporating the recommendations from the statutory nature conservation body and further recommendations for mitigating identified adverse environmental effects. A revised draft Sustainability Appraisal incorporating Strategic Environmental Assessment was produced and further consultation with the statutory nature and heritage bodies undertaken.

3. **How environmental considerations have been included in the National Park Management Plan and how the Sustainability Appraisal incorporating Strategic Environmental Assessment has been considered.**

- 3.1 The Strategic Environmental Assessment process and Sustainability Appraisal identify likely significant positive effects across each of the assessment topics. This is largely in response to the Plan's policy foci on the principles of environmental and social sustainability. However, the assessment did find that the magnitude of these effects and the potential for avoiding adverse effects depends on the design of projects and programmes that implement the Plan.
- 3.2 Whilst the positive likely significant effects identified for different environmental topics and assessment themes are not comparable, they may broadly be summarised as follows:

Topic	Positive likely significant effects
(a)biodiversity:	Increased abundance and diversity supported by resilient ecological networks.
(b)population:	Health and well-being benefits from access to and interpretation of the landscape. Economic benefits derived from support to sustainable businesses, and expansion of 'green' economy.
(c)human health;	Physical and mental health benefits from landscape-based recreational activity

(d)fauna;	Increased abundance and diversity supported by resilient ecological networks.
(e)flora;	Increased abundance and diversity supported by resilient ecological networks.
(f)soil;	Peatland restoration, nutrient management, and footpath works tackling upland erosion.
(g)water;	Water quality improved and run-off slowed through habitat restoration
(h)air;	Improved by promoting active travel, woodland expansion and decarbonising energy/communities.
(i)climatic factors;	Mitigated through GHG budget, sequestration (peatland restoration and woodland expansion) adaptation through place based initiatives, nature based solutions to flood risk and temperature rise, minimised by promoting active travel and adaption through resilient ecological networks.
(j)material assets;	Enhancing the Public Rights of Way network, historic environment and resilient communities, improving access to services and facilities.
(k)cultural heritage, including architectural and archaeological heritage;	Understanding, safeguarding and improving condition and protection of the historic environment.
(l)landscape;	Overall condition enhanced.
(m)the inter-relationship between the issues referred to in sub-paragraphs (a) to (l):	Maintaining the special qualities of the National Park and providing opportunities for people to enjoy them through peaceful recreation.

3.3 Whilst no likely significant adverse effects have been identified. Objectives supporting future visitors were determined to have the potential for adverse impact. Following assessment explanatory text has been added to the Plan to clarify meaning of the word 'sustainability' and its implications in meeting the Missions/Objective. Following further advice from Natural Resources Wales, a further commitment has been made to develop a Sustainable Visitor Strategy to further manage any negative impacts.

4. How opinions expressed during consultation have been taken into account

4.1 The National Park Authority received a small number of representations on the Sustainability Appraisal (incorporating Strategic Environmental Assessment). The following table summarises those received:

Table 2 summary of comments received and NPA Response

Stage	From	Comment	NPA Response
Scoping	Natural Resources Wales	Suggest that SMNR is added to the key environmental protection aims for the Environmental Report under assessment topic (m).	Noted
Scoping	Natural Resources Wales	We recommend the key environmental protection aims for landscape topic in Table 2 and Appendix A should refer to the Statement on Natural Beauty (CCW 2006)	Noted
Scoping	Natural Resources Wales	The protection aim for landscape could be stronger with the use of 'conserve and enhance' rather than protect and sustain	Noted
Scoping	Natural Resources Wales	Fully support the use of the DECCA assessment for the flora topic, and suggest it could be extended to other topic areas, particularly fauna and biodiversity	Noted
Scoping	Natural Resources Wales	Suggest that table 2 has opportunities to further expand the environmental protection aims to include SSSIs alongside the National Site Network and a further reference to ecosystem resilience which should be an embedded theme, aim and objective of the NPMP (and LDP)	Noted
Scoping	Natural Resources Wales	Building ecosystem resilience must go beyond designated sites	Noted

Stage	From	Comment	NPA Response
Scoping	Natural Resources Wales	Include an additional indicator for ecological connectivity and/or ecological resilience	Noted
Scoping	Natural Resources Wales	Flood Risk Assessment Wales (FRAW) map could provide useful information in support of the key indicator for flood risk	Noted
Scoping	Natural Resources Wales	The key aim for topic (h) should be re-considered to include how the LDP will protect the National Site Network and SSSIs among other statutory and non-statutory designated sites from being damaged or for where further damage could occur	Noted
Scoping	Natural Resources Wales	The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2020 although in draft, should be considered in the review of plans, policies and programmes and be an influencing piece of legislation.	Noted
Scoping	Natural Resources Wales	We welcome the inclusion of 'contribution to meeting phosphate targets in rivers and lakes' as a means of framing whether there are any significant effects of the plan in respect of water quality. However we also advise that this may need to be amended to consider wider nutrients which are monitored or may affect the water	Noted

Stage	From	Comment	NPA Response
		quality of protected freshwaters.	
Scoping	GGAT	It should be noted that these are outnumbered by non-designated historic assets, detailed within the Historic Environment Record, and that these are more likely to be impacted by change or development. With the extant legislation, policies, and park policies, enhancement and protection is given, to the historic assets that give a sense of place and value to the Park.	Noted
Consultation Draft	Natural Resources Wales	<i>Potential</i> adverse effects are noted in your assessment for four of the policies and in some instances this may be mitigated through Policy wording strengthening. We have commented on ways to mitigate these through strengthening of wording for "Treescapes" which we consider has a link to potential adverse effects on Biodiversity, through reference to "Right Tree, Right Place" and "Busy Places" through emphasising the ecological sensitivities of the protected sites	Noted and welcomed. Whereas policy statements have been refined in the final draft, the principles embedded here of 'right tree, right place' and of sustainable visitor management are critical and have been taken forward to the final adopted Plan.

Stage	From	Comment	NPA Response
		within the Policy and its proposed Actions	
Consultation Draft	Natural Resources Wales	As noted in our response to the Management Plan, although an interesting approach there are challenges around the complexity of the Doughnut model.	We disagree, we have received much positive feedback on the model and its ease of communicating complex information.
Consultation Draft	Natural Resources Wales	Para 3.8 (Table 3): <i>"General condition of landscape types in the National Park (2021)"</i> . It would be helpful to have the full reference and link to the document here.	Noted and amended
Consultation Draft	Natural Resources Wales	Para 4.2 We would welcome inclusion of the reference to the data source regarding SAC feature condition "Natural Resources Wales indicative assessments (2020)". As mentioned in our comments on the Plan these assessments would normally be provided for feature condition rather than conservation status.	Noted
Consultation Draft	Natural Resources Wales	p14 Table 5: <i>Emerging National Park Doughnut indicators by Environmental Report topic</i> . It would be helpful to clarify the units of measurement for the indicators.	Noted
Consultation Draft	Natural Resources Wales	Where the Indicator trends are listed as "unclear" it would be	Noted – table has been refined to combine both indicator sets and include more detail as to

Stage	From	Comment	NPA Response
		helpful to clarify whether this is due to no data source, or no analysis having been possible/trend detectable?	the data availability/trend analysis.
Consultation Draft	Natural Resources Wales	In summary, we are uncertain how these two different sets of indicators in Tables 5 and 6 are to be used in future State of the Park reporting and suggest therefore some further background explanation of the changes or planned changes to indicators.	See above – refined
Consultation Draft	Natural Resources Wales	It is not clear how the Table 7: Sustainability Objectives for each of the assessment topics of the Environmental Report relate to Table 5 and 6 Indicators. We find this quite confusing due to the different indices. For example, "Flora and "Fauna" uses Section 7 species and "Biodiversity" does not appear to include SSSIs in Table 7.	Noted objectives added to table 7 for clarity
Consultation Draft	Natural Resources Wales	<i>para 6.10 We note and welcome that ...Any detailed plans and programmes which emerge from the Plan will be screened to understand whether more detailed assessments are necessary. Strong</i>	Noted and welcomed

Stage	From	Comment	NPA Response
		<i>matrix and partnership working in partnership practices thorough project development and management processes will ensure benefits are realised across each of the relevant assessment topics.</i>	
Consultation Draft	Natural Resources Wales	p37 We are uncertain what is meant by NPMP Option 2 and feel it would be helpful to make this clearer.	Noted rephrased to <i>Alternative Plan structure and policies for assessment for consideration emerging from Gap analysis above</i>
Consultation Draft	Natural Resources Wales	Finally, we welcome the consideration of Area Statement priorities within the Policy assessment for all four overlapping Area Statements in the National Park and look forward to building on these links.	Noted.
Revised Draft	Natural Resources Wales	With the importance of its link to the Monitoring chapter, we suggest that some of the complexities and novel nature of the approach means there is a need to be mindful that further explanation may be required around communicating the model as part of ongoing external engagement.	Our experience has in direct opposition to that which you fear for the NPA and use of the Doughnut. Our use of the Doughnut Model to display state of the park data against targets for collective activity across the Park has received much positive attention with many people asserting the very opposite of this view. The NPA would be very happy to continue this conversation with you if you remain concerned with the model's complexity.

Stage	From	Comment	NPA Response
Revised Draft	Natural Resources Wales	We reiterate our comment on para 4.2 that SAC feature condition should refer to feature "condition" not "conservation status" (which relates to the condition of the feature across the country as a whole).	Noted
Revised Draft	Natural Resources Wales	We note that in response to our previous comment, the ISA objectives and Doughnut/SoPR indicators are now contained in one unified table to show how they interlink, which is helpful. However, trend data and evidence as you are aware is in some instances weak and sometimes un-referenced and we assume that the ongoing work on the Monitoring chapter will ensure these aspects can be finalised.	Sadly the availability of data which is specific to National Park Boundaries is exceptionally limited. We will endeavour to use the plan period to rectify these data gaps in time for the next State of the Park Report. As such the potential for all data gaps to be filled through consultation would probably not be possible.
Revised Draft	Natural Resources Wales	We have already expressed concern at the lack of reference to LANDMAP in assessing the condition and trend of the National Park's landscapes. We note the reference to the 2012 Landscape Character Area study, although it remains unclear how it will be reconciled with the	Noted

Stage	From	Comment	NPA Response
		current Reading University report.	
Revised Draft	Natural Resources Wales	Also, some gaps remain as mentioned previously e.g. The INNS indicator refers to incidence of re-infestations, but the monitoring measure is stated as number of INN species present in the Park.	Both will be monitored. The boundary level is no INNS within the park
Revised Draft	Natural Resources Wales	We note that “Locally the Missions and Objectives will be implemented through Action Plan development (post adoption) within Place-based and Thematic partnerships including, but not limited to...” It is helpful to see the list of partnerships presented here. Will Thematic plans/Partnerships include for example the Peatland Strategy?	Noted – It is not for the Plan to determine the actions of the Partnerships
Revised Draft	Natural Resources Wales	the plan includes multiple layers of ‘intention’, each layer with increasing specificity i.e., missions, objectives, goals, outcome statements, contributions, actions, and monitoring targets. The SA, however, only considers the first two layers, namely the high-level missions and associated objectives.	The Plan explains that where lower tier plans are necessary to deliver missions, they will be developed in the relative thematic or spatial partnership, for example, the <i>Historic Environment Action Plan</i> which has been developed with the Historic Environment Partnership. Such plans will develop their own action plans. The NPA sees no need in developing a specific action plan to the NPMP as this would be repetitive of others work and take unnecessary

Stage	From	Comment	NPA Response
		The assessment undertaken is therefore relatively limited in its scope as you acknowledge in paragraphs 6.8 and 6.14. We consider the approach risks missing potential effects on the environment, together with identifying opportunities for minimising negative effects and maximising positive effects from the lower layer measures. To manage this risk, we would strongly support the development of a lower tier 'action plan' setting out in more detail the collaborative actions required to meet the goals and monitoring targets, and which would enable a more robust and useful assessment.	ownership of the actions of others.
Revised Draft	Natural Resources Wales	We noted Para 9.1 mentions place-planning and Thematic Action Plans whereas para 8.5 mentions Place, Thematic <i>and</i> Spatial Plans.	Noted and amended
Revised Draft	Natural Resources Wales	Whilst we support the full Well Being of Future Generations Act reference to "sustainable" being included, we note that the assessment predicts, in general	Noted. Additional contribution added to People Mission which reads: <i>6. We will co-design a Sustainable Visitor Strategy working with a wide range of stakeholders with the aim of</i>

Stage	From	Comment	NPA Response
		<p>terms, that there could be adverse impacts from "Future Tourism" on the landscape and cultural heritage of the National Park. Visitor management is an essential role of National Parks to minimise impacts while maximising the many benefits tourism brings. Natural Resources Wales has previously suggested that the Park consider developing a strategy or framework for the whole Park to manage visitors including transport, recreation, access etc which could help to address the predicted impacts in an integrated way as well as action in Places (please refer to all previous responses). We advise, in light of the assessment, that such a strategy/framework should be a priority and we look forward to discussing this further in terms of Action planning requirements to address this.</p>	<p><i>ensuring that the Park meets its objective to be an exemplar destination which manages the needs of visitors with the needs of the environment</i></p>
Revised Draft	Natural Resources Wales	<p>We also note Table 9: Overall assessment of each of the Missions/ objectives against the sustainability objectives and para 7.9 predict</p>	<p>See above</p>

Stage	From	Comment	NPA Response
		"uncertain" impacts from "Future Tourism" on Biodiversity and we suggest there should be further consideration and explanation here as to how the need to reduce the uncertainty relates to action plan requirements for "honey pot" sites, and recreational pressures, particularly where sites are also designated as SACs and that these sites should be clearly stated.	

5. Measures that are to be taken to monitor significant environmental effects of the implementation of the National Park Management Plan

- 5.1 In general assessment predicted many likely significant positive environmental effects arising from the NPMP, and as such the iterative nature of the Strategic Environmental Assessment provided a positive feedback loop, providing reassuring evidence for the predicted benefits of the Plan of value in communicating about the Plan with stakeholders and decision makers.
- 5.2 However two areas were cautioned and have given rise to key changes within the Plan.
- 5.3 Firstly in recognition that many areas of assessment are predicted to be positive subject to more detailed action planning to control impacts, text has been inserted into the Plan to identify the need for further action plans to be devised, so as to ensure that there is opportunity for further environmental assessment to identify opportunities to maximise positive effects and to mitigate as fully as possible any residual adverse effects. For example in relation to objectives relating to Sustainable Tourism. A definition of Sustainable Tourism has been included, as has a commitment on the part of the NPA to co-produce a *Sustainable Visitor Strategy* with impacted stakeholders. This strategy will itself be subject to Strategic Environmental Assessment /HRA.

- 5.4 Secondly, the Plan has significant objectives in relation to carbon reduction, sequestration, and climate change adaptation. In support of this all iterations of the Plan have included reference to increased tree coverage across the Park. However in recognition of the potential negative landscape and environmental impacts of such a policy/target, any reference to tree planting within the Plan now includes the caveat, 'right tree/right place'.

6. Reasons for choosing the National Park Management Plan as adopted, in light of other reasonable alternatives.

- 6.1 Reasonable alternatives have been considered and assessed throughout the plan making process. Please refer to Appendix 3 of the Updated Sustainability Appraisal for detail of this process and its summary paras 6.1-6.6

7. Measures that are to be taken to monitor significant environmental effects of the implementation of the National Park Partnership Plan

- 7.1 A monitoring framework has been developed for the Management Plan in collaboration with the Authority's Stakeholder Reference Panel. The framework involves identifying indicators of success and will incorporate the requirements for Strategic Environmental Assessment monitoring.