



Brecon Beacons National Park Local Development Plan

Final Sustainability Appraisal Report
(incorporating Strategic Environmental
Assessment)

November 2013



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Brecon Beacons National Park Local Development Plan

Final Sustainability Appraisal Report

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NB: Appendices A – G were previously issued as part of the SA Report that accompanied the Deposit Plan in 2010. As these appendices have not been altered since that point they have not been re-issued for the Final SA Report.

Appendices H – L contain the SA Report Addenda that were produced to inform the post-Deposit LDP development stages and are therefore being issued with the Final SA Report.

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Glossary of terms and abbreviations

AA	Appropriate Assessment is part of the HRA process.
Alternatives	These are different ways of achieving the plan objectives. Also referred to as options.
AQMA	Air Quality Management Area. An area identified by local authorities where statutory UK air quality standards are being, or are expected to be breached.
BBNP	Brecon Beacons National Park.
C4S	Centre for Sustainability.
CCW	Countryside Council for Wales.
CFMP	Catchment Flood Management Plans.
Conservation Area	An area designated under the Planning (Listed Buildings And Conservation Areas) Act 1990 as being of special architectural or historic interest, the character and interest of which it is desirable to preserve and enhance.
Cumulative Effects	The effects that result from changes caused by a project, plan, programme or policy in association with other past, present or reasonably foreseeable future plans and actions. Cumulative effects are specifically noted in the SEA Directive in order to emphasize the need for comprehensive information regarding the effects.
DCLG	Department for communities and local government, formerly ODPM.
EAW	Environment Agency Wales.
EC	European Commission.
GHG	Greenhouse Gas.
HRA	Habitat Regulations Assessment. Required to identify likely impacts on Natura 2000 sites.
Indicator	A means by which change in a system or to an objective can be measured.
LBAP	Local Biodiversity Action Plan.
LDP	Local Development Plan.
LSOA	Lower Super Output Area
Mitigation	Measures to avoid, reduce or offset the significant adverse effects of the plan on sustainability.
MoD	Ministry of Defence.
Monitoring	Activities undertaken after the decision is made to adopt the plan or programme to examine its implementation.
Natura 2000 Sites (N2K)	<p>Natura 2000 is the European Union-wide network of nature conservation sites to be established under the Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) – The EC Habitats Directive (on Europa website).</p> <p>Natura 2000 comprises Special Areas of Conservation (SACs) designated under that Directive and Special Protection Areas (SPAs) classified under the Council Directive on the conservation of wild birds (79/409/EEC) – The EC Wild Birds Directive.</p>

NP	National Park.
NPA	National Park Authority.
NPMP	National Park Management Plan.
NTS	Non Technical Summary
Objective	A statement of what is intended, specifying the desired direction of change.
Options	See Alternatives.
PPP	Plans, Policies and Programmes.
PPW	Planning Policy Wales.
Ramsar Sites	Wetlands of international importance designated under the Ramsar Convention (1971).
SA	Sustainability Appraisal. A form of assessment used in the UK since the late 1990s. Sustainability Appraisal considers social and economic effects as well as environmental effects.
SAC	See Natura 2000 Sites
SAM	Scheduled Ancient Monument. A nationally important archaeological site included in the Schedule of Ancient Monuments maintained by the Secretary of State for the Environment under the Ancient Monuments and Archaeological Areas Act 1979.
Scoping	The process of deciding the scope and level of detail of the SEA. This also includes defining the environmental / sustainability effects and alternatives that need to be considered, the assessment methods to be used, the structure and contents of the Environmental / Sustainability Report.
Screening	The process of deciding whether a plan or programme requires SEA or an appropriate assessment.
SEA	Strategic Environmental Assessment. A systematic method of considering the likely effects on the environment of policies, plans and programmes.
SEA Directive	Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".
SEWTA	South East Wales Transport Alliance.
SPA	See Natura 2000 Sites
SPZ	Source Protection Zones.
SSSI	Site of Special Scientific Interest. The best sites for wildlife and geological features in England as designated under the Wildlife and Countryside Act 1981.
SUDS	Sustainable Drainage Systems.
SWWITCH	South West Wales Integrated Transport Consortium.
Target	A specified desired end, stated usually within a specified time-scale.
TRACC	Transport Consortium for Mid Wales Region.
UDP	Unitary Development Plan.
WAG	Welsh Assembly Government.

Final Sustainability Appraisal Report

Non-Technical Summary

Background

This document is the Non-technical Summary (NTS) of the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) for the Brecon Beacons Local Development Plan (LDP). It summarises the Sustainability Process that has been undertaken during the development of the LDP from 2006 through to the LDP's adoption in 2013. In accordance with the requirements of SEA regulations and Government planning regulations, an Adoption Statement has also been published alongside the Adopted Local Development Plan (LDP).

Sustainability Appraisal/ Strategic Environmental Assessment

A Strategic Environmental Assessment (SEA) has been carried out on the LDP as it has the potential to produce significant environmental effects. Sustainability Appraisal (SA) is required under other legislation relating to the new Local Development Plans (LDPs) being prepared by local planning authorities. This is in addition to SEA. The LDP guidance¹ merges the SA and SEA elements into a single process and therefore a joint SA/SEA process is being undertaken.

The main purpose of SA/SEA is improve the sustainability performance of a plan by assessing whether it is likely to result in any significant effects (positive or negative) and then making recommendations as to how adverse effects can be avoided, offset or reduced, as well as how improvements can be made. A programme to monitor significant effects is required in order to check whether the SA/SEA has been accurate in its predictions.

This Non-Technical Summary forms part of the final Sustainability Appraisal Report (SA Report) that has been prepared to accompany the LDP at the Adoption stage.

The Local Development Plan

The National Park Authority (NPA) have prepared their next Development Plan, known as the Local Development Plan or LDP. The LDP includes a set of concise development policies and proposals and will supersede the current Unitary Development Plan (UDP) as the development plan for the National Park area. The LDP covers a rolling 15 year period, with regular monitoring review.

As part of the LDP preparation process, the NPA prepared a 'Deposit LDP' which set out the future development strategy for the National Park. The Deposit LDP included the proposed vision and objectives for the Park. It also contained the proposed spatial strategy, planning policies and candidate sites that are needed to achieve the objectives of the LDP.

¹ Local Development Plan Manual (Welsh Assembly Government, 2006)

The Local Development Plan that the National Park Authority will be considering for formal adoption incorporates the Focused Changes, the Additional Focused Changes and the recommended Matters Arising Changes. As stated in the Inspector's Report on the Examination into the Brecon Beacons National Park Authority Local Development Plan, the Local Development Plan subject to these changes provides an appropriate basis for the planning of the National Park up to 2022.

The SA/SEA Process

The assessment process is briefly described below and summarised in Figure NTS 1. The SEA Regulations require that the following topics are investigated: Air; Biodiversity; Climatic factors; Cultural heritage; Human health; Landscape; Material assets; Population; Soil; Water; and the interrelationship between these factors. The Sustainability Appraisal element of the process widens this to include consideration of social and economic issues.

Stage A – At the initial scoping stage the sustainability characteristics of the area, including any trends were documented and the policy context of the LDP was reviewed to gain an understanding of the issues and priorities for the Park. From the outputs of these two initial stages the key sustainability issues and opportunities that exist in the Park were identified, on which the assessment should focus. A series of SA/SEA Objectives were developed to concentrate the subsequent assessment process on these issues.

Stage B - This stage involved predicting the effects that would result if the plan were implemented and then assessing whether any of these effects would be significant. Where potential adverse effects were identified then measures to mitigate these effects were proposed.

Stage C - The Sustainability Appraisal Report pulls together the results of all the assessment activities that have been undertaken and identifies monitoring activities to check the accuracy of the assessment once the Plan is adopted.

Stage D – This stage involves consultation on the SA Report with environmental bodies, key stakeholders and the public. The SA will then assess any significant changes to the Plan that are made after the consultation. At Plan adoption, an SA Adoption Statement will be published which explains how the SA has influenced the plan making process and finalising the monitoring arrangements.

Stage E – This stage takes place after the LDP is adopted and covers the monitoring of the predicted effects.

Sustainability Issues and Objectives

The first stage of the SA/SEA focused on the identification of the sustainability issues in the Park. Some of the main issues identified include:

- Increased risk of flooding;
- Targets for greenhouse gas emissions not being met;

- Acid rain (originating outside of the Park);
- Reservoirs running dry or low during prolonged drought;
- 9 of the 11 internationally important sites for nature conservation have features in an unfavourable condition;
- Seasonal population fluctuations;
- Limited land available for housing in Brecon; and
- Lack of railway transport.

Further detail can be found in the SA Report and its accompanying appendices.

Government guidance² on how to undertake SEA recommends that objectives are developed that relate to the key issues, so that the assessment can use these objectives to focus on the prediction and assessment of the effects that are most important in an area. The broad objectives that have been used in this SA/SEA are listed in Table NTS1. These objectives were developed as part of the Scoping Report and updated following consultation on that report in order to take account of consultation comments.

² A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)

Summary of the LDP & SA/SEA Processes

LDP	SA/SEA		
Evidence Gathering & Objectives	Compiling Sustainability Baseline Review of Plan, Policies and Programmes Consultation with	Establish the key issues	SA/SEA STAGE A
	Sustainability Problems and Opportunities	Develop the SA/SEA Methodology	
	Definition of SA/SEA Objectives	Define objectives to assess the sustainability performance of the LDP	
Strategic Options and Preferred Strategy	Consideration of Alternatives	Examine alternative ways of delivering the plan	SA/SEA STAGE B
	Assessment of Significant Effects of Plan options	Determine which sustainability effects are significant	
	Propose Mitigation & Enhancement	Offset negative effects and maximise positive effects	
LDP Preparation & Deposit	Publish Initial SA Report & Consult	Make information available to stakeholders & members of the public	SA/SEA STAGE C & D
	Update SA based on Deposit LDP Publish SA Report	Update assessment based on more detailed policies to be included in deposit LDP	
	Submission, Examination & Adoption	Publish Final SA Report and SA Adoption Statement Document how the SA/SEA has influenced the development of the LDP	
Monitoring and Review	Monitoring of Predicted Effects	Ensure predictions were accurate and mitigation is effective	SA/SEA STAGE E

Figure NTS 1: Summary of the SA/SEA Process

Table NTS 1: SA/SEA Objectives

SA/SEA Topic	SA/SEA Objective
Climatic Factors	Ensure that adequate measures are in place to adapt to the impacts of climate change.
	Mitigate effects on climate change by reducing greenhouse gas emissions in both existing and new development.
Natural Resources: Air, Water and Soil	To maintain or improve air quality.
	Maintain or improve water quality, and minimise the adverse effects of land use on water quality.
	Promote sustainable use of water resources and minimise adverse effects on water quantity.
	To protect and enhance soil quality (including non-chemical soil functions and processes such as permeability) and quantity, especially of carbon rich soils.
	Conserve geodiversity and promote the understanding and enjoyment of geodiversity.
Biodiversity	To value, conserve and enhance the diversity of species, habitats and ecosystems.
Cultural Heritage	To understand, value, protect and manage historic landscapes, scheduled ancient monuments and other archaeological features appropriately.
Landscape and the Built Environment	Maintain and enhance the quality of the built environment.
	Maintain and enhance the Park's landscape character and its associated features.
Material Assets	Make sustainable use of natural resources and build and maintain environmentally friendly, high quality, services and infrastructure.
	Increase sustainable transport opportunities.
Population and Human Health	Maintain distinctive cultural identity and ensure the needs of the changing demographics are reflected.
	Promote and improve accessibility to the Park and to its opportunities and facilities.
Education and Skills	Increase opportunities to build an education and skills base.
Achieving and Sustainable Economy	Promote a thriving, locally-based economy.

Initial Assessment of Alternative Strategies

An initial assessment of the four Strategic Development Options which were being considered by the NPA during the development of the Preferred Strategy was undertaken. These options were:

1. *The National Park Conservation Strategy/ Containment Strategy*
2. *Community Vitality Strategy*
3. *Sustainability and Climate Change Strategy*
4. *Market-led Growth Strategy*

The alternative strategies were each assessed to see how they would perform against the SA/SEA objectives – i.e. would the alternative help to achieve the objectives or would it have the opposite effect.

The assessment used the following scoring system:

Significance Assessment	Description
++	Option would have a major positive effect on sustainability in its current form as it would resolve an existing issue or maximise opportunities. SIGNIFICANT
+	Option would have a minor positive effect on sustainability.
?	Effect of option on sustainability is uncertain.
0	Option would have a neutral effect on sustainability.
-	Option would have a minor adverse effect on sustainability.
--	The option would have a major adverse effect on sustainability as it would substantially exacerbate existing problems. Consider exclusion of option. SIGNIFICANT

The results of this assessment can be seen in Figure NTS 2. More detail on the assessment can be found in the full SA Report and its accompanying Appendices.

SASEA Objective	Climate change adaptation	Greenhouse gas reduction	To maintain or improve air quality.	Water quality	Water quantity and flood risk.	Soil quality and quantity	Conserve geodiversity	Conserve and enhance biodiversity	Historic landscapes, monuments & archaeology	High quality services and infrastructure.	Landscape character and its associated features.	Make sustainable use of natural resources.	Increase sustainable transport opportunities.	Population and health	Promote and improve accessibility to the Park	Build an education and skills base.	Promote a thriving, locally-based economy
Option 1: Containment Strategy	0	+	0	?	-	0	0	?	?	-	0	0	+	?	0	0	?
Option 2: Community Vitality Strategy	0	-	?	?	-	?	0	?	?	?	?	-	-	?	+	0	+
Option 3: Sustainability & Climate Change Strategy	+	+	0	?	?	?	0	?	?	?	?	-	+	?	0	0	+
Option 4: Market-led Growth Strategy	-	?	?	?	-	?	0	?	?	?	?	-	+	?	0	0	+

Figure NTS 2: Summary of Alternatives Assessment

The assessments of the alternatives, along with other evidence gathered by the NPA, were then used to inform the plan makers as to the likely environmental/sustainability effects of each alternative to help them decide which of these should be taken forward as the 'Preferred Strategy'.

The Preferred Strategy

The evidence collected showed that the Preferred Strategy should balance the need to mitigate the effects of climate change and environmental impact against the need to provide opportunities for key social and economic growth whilst maintaining localised community vitality. Clearly, no one single option considered above would have been able to achieve this and the NPA therefore developed a hybrid strategy to bring forward the most beneficial outcomes from the four options. The hybrid strategy was developed to:

- Have sustainability and climate change at its heart;
- Enable economic growth and opportunities for regeneration in the strategic settlements identified in the Wales Spatial Plan; and
- Be responsive to communities' aspirations for some growth outside key settlements, particularly in those communities in the West of the Park.

Similar to the assessment undertaken on the alternative strategies, each of the plan elements of the Preferred Strategy (i.e. vision, objectives, strategy, policies etc.) was assessed and further information on this can be found in the SA Report produced to accompany the consultation in January 2009.

The Deposit LDP

As with the assessment of the Preferred Strategy, the assessment of the Deposit LDP was undertaken on the strategies and policies. However in addition, assessment was also undertaken on the site allocations.

Spatial Strategy

The assessment found that the Spatial Strategy provides a good balance between focusing development in the key settlements whilst allowing for demonstrated local needs to be met in smaller settlements and rural areas. The growth in key settlements will help to support certain regeneration needs in the towns and improve levels of community vitality, with associated social and economic benefits. It will also help to service the needs of surrounding areas. The strategy prevents the general dispersal of development across the wider Park countryside.

Through the moderate levels of growth proposed there will inevitably be increases in levels of land and resource use as well as increased greenhouse gas emissions from increased activities. However by focusing growth in the key settlements, the wider effects on the special qualities of the National Park should be minimised and through concentration of growth the strategy should also reduce the need to travel, particularly by private car. Also, several of the strategic and detailed policies and that support the Spatial Strategy will help to minimise the potential adverse effects that have been identified.

Deposit LDP Policies

The assessment of the Deposit LDP has found that generally the policies are likely to have positive Park-wide effects across the range of sustainability topics. The assessment has indicated that the Deposit Policies provide strong progression of core SA objectives, in particular those for climate change adaptation/mitigation through location and design of new development, and for population through the support for necessary regeneration within certain settlements, the provision of affordable housing to meet identified needs within the Park, and policies that enable appropriate levels of development within the smaller Park communities in order that they can maintain vitality and viability. The protection of the Park’s special qualities and the environment in general are built-in at multiple levels within the LDP.

The results of the assessment are summarised in **Figure NTS 3**.

Policy area	SA Objective	CC Adaptation	GHG Emissions	Air Quality	Water Quality	Water Resources	Soils	Geodiversity	Biodiversity	Cultural Heritage	Built Environment	Landscape	Natural Resources & Infrastructure	Sustainable Transport	Population	Access to Park & Facilities	Education & Skills	Economy
Strategic SP10		+	+	+	?	-	-	0	?	?	?	?	?	+	++	0	+	+
Brecon		+	+	0	+	+	-	0	-	+	0	+	+	+	+	+	0	+
Crickhowell		+	+	0	+	+	-	0	-	+	0	+	+	+	+	+	0	+
Talgarth		+	+	0	+	+	-	?	0	-	+	+	+	+	+	+	0	+
Hay on Wye		+	+	0	+	+	-	0	-	+	+	+	+	+	+	+	0	+
Level 3 settlement		0	+	0	+	+	-	0	-	+	0	+	+	+	+	0	0	+

Policy area	SA Objective	CC Adaptation	GHG Emissions	Air Quality	Water Quality	Water Resources	Soils	Geodiversity	Biodiversity	Cultural Heritage	Built Environment	Landscape	Natural Resources & Infrastructure	Sustainable Transport	Population	Access to Park & Facilities	Education & Skills	Economy	
Level 4 settlement		0	+	0	+	+	-	0	- +	0	+	+	+	+	+	0	0	+	
Edge of settlement		+	+	0	+	+	0	0	+	0	0	?	+	0	+	0	0	0	
Countryside		0	+	0	0	0	-	0	-	0	+	-	+	+	+	+	+	+	
NP Policy		0	0	0	+	+	+	+	++	+	+	++	0	0	++	+	0	++	
SP2 Major Devt		+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	?	
SP3 Environmental Protection.		+	0	+	+	+	+	+	++	+	+	++	0	0	+	+	0	+	
SP 4 Climate Change		+	+	+	0	+	+	0	+	0	0	0	?	?	+	0	0	+	
SP11 Sustainable Design		+	+	0	+	+	0	+	+	+	+	+	++	?	+	0	+	+	
SP9 Renewables		0	+	0	?	?	0	0	?	?	?	?	0	0	?	0	+	+	
SP5 Housing		0	-	-	0	-	-	0	-	0	+	0	+	0	++	0	0	+	
SP6 Affordable H		0	+	0	0	0	-	0	-	-	0	-	?	0	++	0	0	+	
SP 12 Economy		0	+	0	0	0	0	0	0	0	+	+	0	0	++	0	+	++	
SP 13 Retail		0	+	0	0	0	0	0	0	0	+	0	0	0	+	+	0	++	
SP 14 Tourism		0	-	-	0	0	?	0	?	0	0	0	0	0	+	+	+	+	
SP15 Communities		0	+	0	0	0	0	0	0	0	0	0	0	0	++	0	+	0	
SP16 Infrastructure		+	0	0	+	+	?	?	+	+	+	+	++	+	+	0	0	0	
SP17 Transport		0	+	+	+	0	0	0	0	0	+	+	0	+	+	+	0	0	
SP18 Sustainable Use of Land		+	0	0	0	0	+	0	+	0	0	+	0	0	0	0	0	0	
SP7 Waste		0	+	?	+	0	?	0	0	0	0	+	++	0	+	?	0	0	+
Minerals policies		0	+	+	+	0	+	?	+	+	0	+	++	0	+	0	0	-	

Figure NTS 3: Summary of Deposit LDP Assessment

Site Allocations

The specific sites proposed for development in the Deposit LDP generally performed well against the SA objectives, particularly the population objective. However as the majority of the sites are currently greenfield locations, development will inevitably result in some adverse effects such as soil sealing, loss of habitats and local landscape impacts. There are also some flood risk issues associated with a few sites and wider issues relating to waste water infrastructure capacity.

Where adverse effects have been identified against particular policies or site allocations several of the strategic and detailed policies will help to minimise the potential adverse effects that have been identified.

Post-Deposit Sustainability Appraisal (2011 – 2013)

Following the consultation on the Deposit LDP in late 2010, and prior to the finalisation of the LDP for adoption, a number of changes to the LDP were proposed. Further sustainability appraisal was undertaken to determine whether the inclusion of the changes would be likely to have significant sustainability effects beyond those already identified in the Deposit LDP SA Report. This further assessment was undertaken at four stages, as follows:

- Proposed Focused Changes – October 2011;
- Additional Focused Changes – September 2012;
- Potential School Closure Sites – February 2013; and
- 'Matters Arising' Changes – June 2013.

The additional assessment has identified new significant effects, both positive and negative – beyond those already identified for the Deposit LDP.

The significant positive effects identified are in support of the SA objectives for 'Biodiversity'; 'Cultural Heritage'; and 'Built Environment' in relation to a range of new policies proposed at the Focused Changes stage (October 2011).

The new significant adverse effects have been identified in relation to two site allocations that were introduced as 'Matters Arising Changes' (June 2013). These sites are 'CS117: Proposed extension to T9, Talgarth' and 'CS111: The Former Mid Wales Hospital, Talgarth'. In both cases the significant adverse effects were identified for the 'landscape' SA objective. However, several of the strategic and detailed policies in the LDP will help to minimise the potential adverse effects that have been identified in the assessments.

Overall the changes introduced to the Plan in the post-Deposit stages do not affect the main findings of the SA Report which found that generally the LDP is likely to have positive Park-wide effects across the range of sustainability topics.

Mitigation and Recommendations

A key role of the SA/SEA is to provide recommendations as to how the sustainability performance of a plan can be improved. The LDP already includes a range of policies that seek to prevent and where possible enhance the environment and overall sustainability of the plan. The SA/SEA has built on this by identifying a range of recommendations as to how LDP can maximise its performance against the range of sustainability topics. Some of these recommendations seek to mitigate potential adverse effects, whilst others look to build on some of the opportunities that are presented by Park's wealth of environmental resources. The majority of the recommendations made throughout the SA process were incorporated into the LDP. Examples include:

- Encouraging the protection and enhancement of wildlife corridors;
- Consideration of policy elements relating to the location of development to reduce the need to travel or to link in with existing public transport, and walking and cycling networks; and
- Encouraging the use of more sustainable modes of transport, including public transport, cycling and walking.

Monitoring

Once the LDP is adopted, its effects on the environment are to be monitored to allow action to be taken to reduce and/or offset any significant effects.

A monitoring framework has been developed that incorporates measures that have already been developed by the National Park Authority to monitor the implementation of the LDP and the SA/SEA of National Park Management Plan.

1 Introduction

1.1 Background to Sustainability Appraisal/Strategic Environmental Assessment

The Planning and Compulsory Purchase Act 2004 requires planning authorities to undertake a Sustainability Appraisal (SA) of their Local Development Plan (LDP) and report the findings as an integral part of the process of plan preparation. In addition to this, the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 requires planning authorities to undertake a formal Strategic Environmental Assessment (SEA) of plans and programmes that are likely to have significant effects on the environment.

Brecon Beacon National Park Authority (BBNPA) has integrated the SA/SEA into the plan making process, the SA/SEA having provided input at each stage when decisions have been taken. In developing the SA/SEA, BBNPA have had regard to the specific objectives and principles of Planning Policy Wales (PPW).

1.2 Screening

An initial screening process confirmed that the LDP will have a significant economic, social, and environmental impact on the National Park area and should therefore be subject to SA/SEA. The LDP also has the potential to have adverse effects on nature conservation sites of European importance, and therefore a Habitats Regulations Assessment (HRA) has also been required.

1.3 Sustainability Appraisal (SA)

Sustainability Appraisals (SAs) are a process of evaluating the social, environmental, and economic implications of emerging strategies, policies and plans. This process is intended to make certain that plans and their goals³ and policies are in accordance with the underlying principles of sustainable development. SA seeks to ensure that the five principles and four agreed priorities for sustainable development are addressed⁴. These are as follows:

Principles:

1. Living within environmental limits;
2. Ensuring a strong healthy and just society;
3. Achieving a sustainable economy;
4. Promoting good governance; and
5. Using sound science responsibly.

Priorities:

- Sustainable consumption and production;
- Climate change and energy;
- Natural resource protection and environmental enhancement; and
- Sustainable communities.

³ Note that the term "objective" is used throughout this document in reference to SA/SEA objectives to be consistent with the vocabulary outlining these processes, despite the fact that they are not truly objectives.

⁴ As set out in "Securing the Future: Delivering a UK sustainable development strategy", DEFRA 2005

Protected areas should provide exemplars of best practice of sustainable development for wider Wales, so as a result it is important that the process of undertaking the SA in this case is seen as an example of best practice.

1.4 Strategic Environmental Assessment (SEA)

European Union Directive 2001/42/EC requires a formal Strategic Environmental Assessment (SEA) of all plans and programmes which are likely to have significant effects on the environment. It aims: "*...to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development ...*" (Article 1).

The Directive defines environmental assessment as a procedure comprising:

- The preparation of an Environmental Report on the likely significant effects of the draft plan or programme;
- carrying out consultation on the draft plan or programme and the accompanying Environmental Report;
- Taking into account the Environmental Report and the results of consultation in decision making; and
- Providing information when the plan or programme is adopted showing how the results of the environmental assessment have been taken into account.

SEA is required to be undertaken alongside the preparation of the plan to which it relates, to allow strategic alternatives to be formally incorporated into it at the earliest opportunity. This process, in conjunction with the requirements of the SA, should ensure that the environmental, social, and economic implications are fully integrated into emerging policies and strategies.

The SA/SEA of the LDP is being carried out by the Centre for Sustainability (C4S) to provide an independent assessment of the significant effects of the plan on environmental and sustainability issues. C4S are being supported by Enfusion Ltd for the HRA, the findings of which have informed the SA/SEA process.

1.5 Methodology

In accordance with current guidance the Sustainability Appraisal has been combined with the Strategic Environmental Assessment as one cohesive process and the findings of the SEA (environmental focus) have been incorporated into the broader SA which includes more of a socio-economic focus. The SA/SEA process has been integrated into each of the LDP preparation stages (Figure 1-1), thereby ensuring consistency between objectives, transparency in decision making, and a consistent level of rigour throughout the process.

This single process will subsequently inform monitoring of the effectiveness of the plan's implementation and assist in any future revisions.

1.6 Stages of the SA/SEA

The stages of the LDP and SA/SEA are shown in Figure 1-1. The documents produced are available to download on BBNPA's website at:

<http://www.breconbeacons.org/>.

This document is the Final SA Report that has been prepared to accompany the LDP at the Adoption Stage.

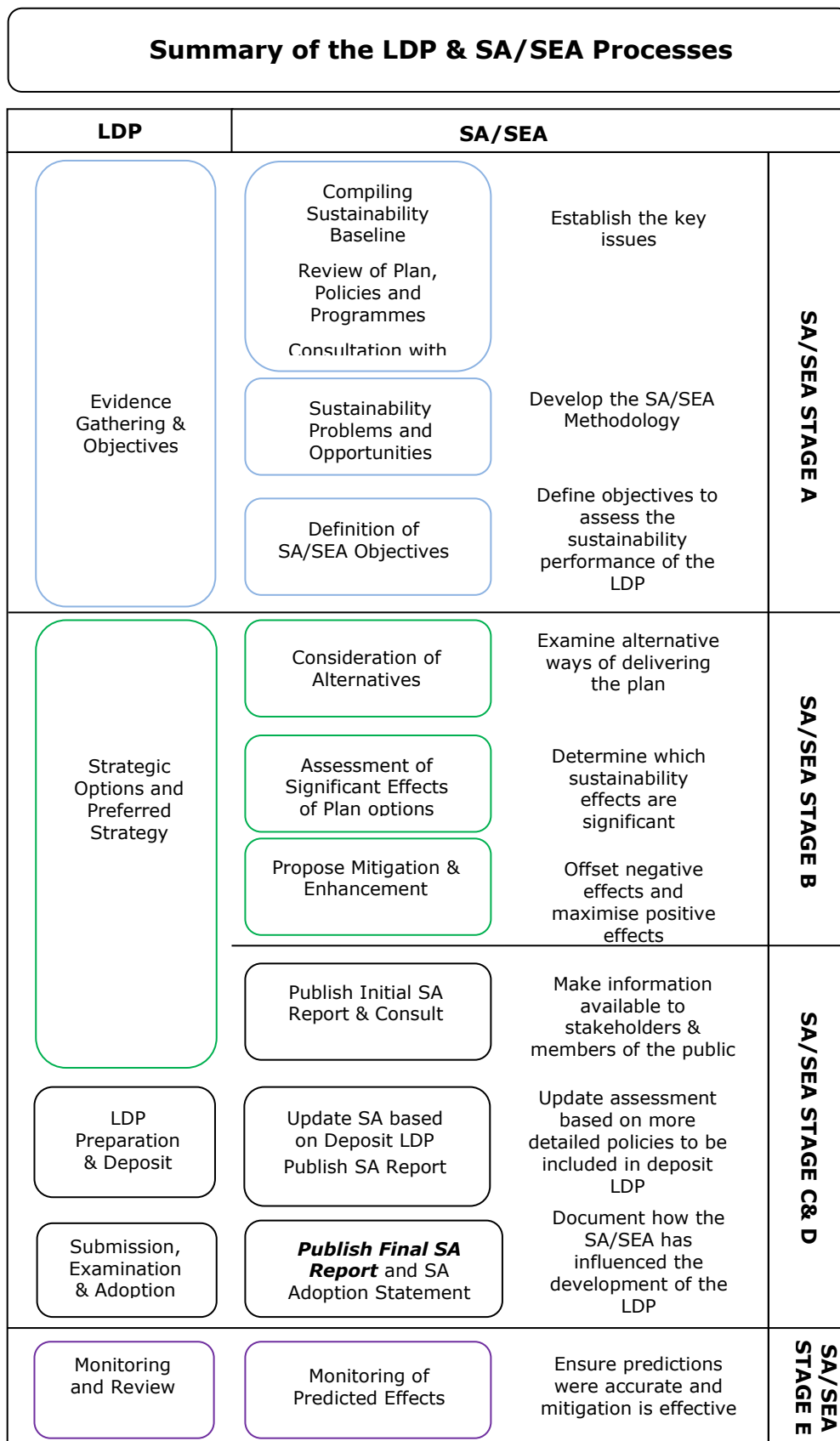


Figure 1-1: The LDP and SA/SEA Processes

1.7 Compliance with the SEA Directive/ Regulations

The SEA Regulations set out certain requirements for reporting the SEA process, and specify that:

"The Environmental Report required by the SEA Directive can be included in an assessment report on the wider effects of the plan or programme, such as a Sustainability Appraisal Report. However it must clearly show that the Directive has been complied with, for example by signposting to enable the components that meet the requirements for the Environmental Report to be readily identified."

Consequently, the requirements for reporting the SEA process are set out below, and the section of the report that includes each requirement is indicated.

An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes:

- Section 2.3 of this report sets out the contents of the Local Development Plan, including the vision, objectives and preferred strategy. The relationship with other relevant plans is summarised in Sections 3.2 and 3.3 and detail is provided in Appendix B.

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme:

- Section 3.5 of this report summarises the relevant baseline conditions for the National Park. Appendix A sets out this information in more detail. The likely evolution of current conditions is provided in Section 3.6 and Appendix A.

The environmental characteristics of areas likely to be significantly affected:

- Where relevant and available, information regarding particular areas has been included in Section 3.5. Good practice guidance specifies that the contents and level of detail of information required should be relevant to the particular plan being assessed. Accordingly, baseline information is provided at a range of different scales where available and appropriate.

Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive):

- Section 5.1 of this report summarises existing sustainability problems for the Park. Issues relating to Natura 2000 sites (designated by the above directives) are outlined in Section 1.8.

The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation:

- Appendix B outlines the environmental protection objectives relevant for sustainability in Park, and the implications of these objectives for the LDP.

The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and

archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects:

- The SA Framework of objectives presented in Section 5.2 and Appendix D of this report covers all of the topics in the SEA Regulations, and progresses them through SA objectives. This assures that all of the issues are considered during the assessment of the LDP. The likely effects of the LDP (including environmental effects, as well as an indication of the nature of that effect) are summarised in Section 8 of this report and detailed in Appendices F and G.

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme:

- Where significant adverse effects have been forecast for an element of the LDP the SA has considered whether there are safeguards in place from other LDP elements (e.g. policies relating to environmental protection). In addition measures have been outlined to mitigate other adverse effects through the on-going SA process (see Section 9).

An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information:

- Section 6 summarises the assessment conducted on strategic alternatives considered at earlier stages of the LDP development. The detailed assessment of these options can be seen in Appendix E.
- Section 7 provides a summary of the assessment of the Preferred Strategy that was published in January 2009.
- Section 8 provides a summary of the assessment of the Deposit LDP Draft Strategy, Policies and Allocations. The detailed assessment matrices are presented in Appendices F and G.
- The difficulties encountered in compiling information are summarised in Section 8.9.
- Section 10 provides a summary of the assessment undertaken following consultation on the Deposit LDP. The detailed assessments matrices are presented in Appendices I - L.

A description of measures envisaged concerning monitoring in accordance with Article 10:

- Potential measures envisaged for the monitoring of the sustainability effects (including environmental effects) arising from implementing the LDP are discussed in Section 11.2 of this report.

A non-technical summary of the information provided under the above headings:

- The non-technical summary was produced as a free-standing document at the Deposit LDP stage. For this Final SA Report the non-technical summary has been incorporated as the first part of this report.

Consultation:

- The results of the consultations on the Scoping Report, Initial SA Report and Deposit LDP SA Report, and appropriate modifications made, are provided in Section 4 and Appendices C and H.

1.8 Habitats Regulations Assessment

Habitats Regulations Assessment (HRA) of spatial, development plans is a requirement of the Habitats Directive (92/43/EEC) as set out in the amended Habitats Regulations⁵ (2007). A HRA for the LDP has been undertaken as a separate process to the SA/SEA. A summary of the process, results and recommendations are provided below. Further detail can be found in the HRA Report available at www.breconbeacons.org.

The screening assessment considered the potential for impacts arising from the Brecon Beacons National Park Authority Local Development Plan and the likelihood that the impacts arising would result in significant effects on the twelve European sites scoped into the Screening Assessment.

The first stage of the screening, undertaken at Preferred Strategy stage, concluded that there was potential for likely significant effects at four European sites (Llangorse Lake SAC, River Usk SAC, River Wye SAC and Usk Bat Sites SAC) as a result of identified impacts arising primarily from the proposed housing and employment allocations within the National Park. It was recommended that further screening work was undertaken once specific site allocations were known, and that where the effects of policies are dependent on how implementation occurs through the life of the plan, that caveats or restrictions are inserted to exclude support for potentially damaging proposals.

The second stage of the screening undertaken at Deposit stage (including proposed site allocations) identified that there was potential for likely significant effects at five European sites (Blaen Cynon SAC, Llangorse Lake SAC, River Usk SAC, River Wye SAC and Usk Bat Sites SAC) both alone (as a result of the location of certain candidate sites) and combined with other plans and programmes.

The screening recommended a number of policy safeguards that seek to address issues identified through the assessment. These recommendations were subsequently incorporated into the LDP. Monitoring measures and a joint Water Cycle Study (after adoption of the LDP) were also recommended as a result of data limitations and the uncertainty surrounding the implementation of development.

The screening concluded that with the recommended policy safeguards and monitoring measures incorporated into the Plan, the Deposit LDP would not have likely significant effects on European sites either alone or in combination with other plans or projects.

⁵ Habitats Regulations (The Conservation (Natural Habitats, & c.)(Amendment) (England and Wales) Regulations 2007)

2 Brecon Beacons National Park Local Development Plan

2.1 The Brecon Beacons National Park

The Brecon Beacons National Park (BBNP) contains some of the most spectacular and distinctive upland landforms in southern Britain. The Park covers 520 square miles (1,347 square kilometres) and lies between rural Mid Wales and the industrial South Wales Valleys. It is a diverse landscape, where sweeping uplands contrast with green valleys, with dramatic waterfalls, ancient woodland, caves, forests and reservoirs. The highest point in the Park is Pen y Fan in the Brecon Beacons, at the centre of the National Park. Its distinctive table-topped summit stands at 886m, and it is climbed by hundreds of thousands of people each year.

The Park is home to 33,000 people and over 9,000 different types of plants and animals. It has a strong Welsh heritage and rich economic, social and cultural life. The largest settlement is the cathedral town of Brecon with a population of approximately 7,500. Meanwhile, over 3 million people a year come to the Brecon Beacons National Park to enjoy the unforgettable landscape. The mountains, uplands and valleys are all excellent walking country. Others come to enjoy such activities as horse riding, cycling and mountain biking, and water-based recreation.

2.2 National Park Purposes and Duty

National Parks were designated under the 1949 National Parks and Access to the Countryside Act, but their current framework is the Environment Act 1995. Section 61 sets out their two purposes:

- Conservation and enhancement - *"to conserve and enhance the natural beauty, wildlife, and cultural heritage of the National Parks"*
- Understanding and enjoyment - *"to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public."*

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

The Parks have national and international importance as protected landscapes, and their funding and specialist staff help them serve as test-beds for sustainable and innovative development and management. Their work locally can therefore have national and global benefits.

The National Parks of Wales, Scotland, and England are Category V protected areas as defined by the World Conservation Union (IUCN) in the Guidelines of Protected Area Management Categories 1994. Category V protected areas are living and working landscapes with characteristic qualities, features, and services that have been moulded by the interplay of natural forces and human activities over the course of time. Consequently, careful regard must be given to the linkage between local communities and economies and environmental conservation in and around the National Parks. As such, the National Park Authority (NPA), in pursuit of the two statutory purposes, has a duty to:

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

Section 62(2) of the Environment Act 1995 imposes a duty on all public bodies to have regard to the two National Park purposes when making their decisions or carrying out activities in relation to or so as to affect land within a national park. The NPA leads the actions and facilitates the partnerships required to fulfil the Park purposes and duty, with the aim to foster a collective sense of purpose. In so doing, the NPA's role is to facilitate, coordinate, and add value to the work of others in the Park. It is not the responsibility of the NPA to duplicate work or assume others' responsibilities except where previously agreed. To this end, responsible stewardship of the National Park rests not only upon the shoulders of the National Park Authority but also upon the shoulders of all who reside, work, recreate, and/or have a vested interest in the Park.

The National Park Management Plan (NPMP) is the principal vehicle for ensuring that the statutory provisions of the Act are met⁶. The central role of the management plan, then, is to guide the delivery of the statutory purposes and duty, assisted by the NPA's statutory planning function.

The National Park Authority is the planning authority for the National Park area. The Brecon Beacons National Park, as an administrative area, covers parts of 9 of Wales' 22 Unitary Authorities (see Figure 2-1)

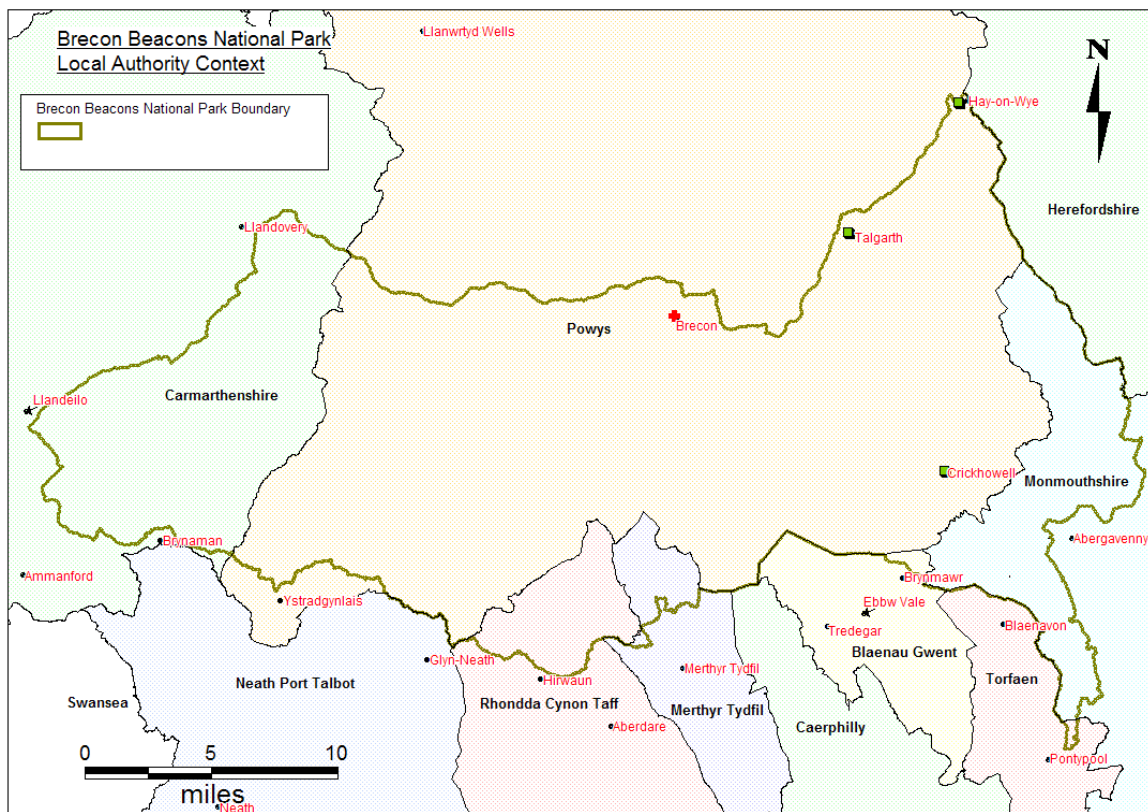


Figure 2-1: Brecon Beacons National Park Local Authority Context

⁶ National Park Management Plans: Guidance. CCW (2006)

2.3 The Local Development Plan

Part 6 of the Planning and Compulsory Purchase Act 2004⁷ requires each authority in Wales to prepare a Local Development Plan (LDP) for its area (section 62 of the 2004 Act). The requirement will build upon the substantive work that Brecon Beacons National Park Authority (BBNPA) has undertaken in developing its Unitary Development Plan (UDP), including consultative processes, gathered evidence and policy development. The LDP will become the Development Plan for the BBNPA when it is adopted (scheduled for 2012), superseding the current Authority Approved UDP and the Adopted Local Plan.

The LDP will act as the Development Plan for the BBNPA over a rolling 15 year period with regular monitoring reviews. It will comprise a strategy and integrated set of policies and site specific proposals that are linked to the vision of the NPA's constituent authorities' community strategies and the BBNPA NPMP. As with previous development plans the LDP will be used to support appropriate development and minimise inappropriate projects. It will therefore provide a basis by which planning applications can be determined consistently and appropriately.

The Government's stated intention in changing the planning system has been to make the production of development plans faster, more responsive to change and based on sound community involvement.

2.3.1 The National Park Management Plan Vision

The vision for the Brecon Beacons National Park Local Development Plan (LDP) is derived from the National Park Management Plan: Managing Change Together (2009 – 2014). The Management Plan was approved for publication on the 9th April 2010. The NPMP vision is as follows:

<i>In 2030 the Brecon Beacons National Park will be...</i>
<ul style="list-style-type: none"> • <i>Recognised internationally and nationally for its value as a protected area, whose character continues to be shaped by the long-standing interactions between people and the processes of nature.</i> • <i>Widely acclaimed for its natural beauty, geodiversity, biodiversity, and cultural heritage which are being conserved and enhanced by its stakeholders through traditional and innovative means.</i> • <i>A sought-after destination providing an outstanding variety of sustainable opportunities for all to understand and enjoy its tranquillity, rural character, Welsh way of life, sense of remoteness, and other special qualities.</i> • <i>Resilient, open, and responsive to change—particularly climate change—and its stakeholders proactive in mitigating and adapting to the effects of undesirable change through local action.</i> • <i>Less dependent upon external supply chains leading to increased food and energy security locally, improved quality of life, community cohesion and conservation of natural capital.</i> • <i>A living landscape where innovative approaches to sustainable development and renewable energy are encouraged and tested for the benefit of the environment,</i>

⁷ The 2004 Act

the economy, and local communities.

- **Managed sustainably⁸ through active partnerships** among the Park's stakeholders so that it continues to be a source of inspiration and enjoyment for future generations.
- Monitored over the long term to improve future policy and management practice.

2.3.2 The Local Development Plan Vision

The National Park Management Plan is the overarching vision for the National Park. It coordinates and integrates other plans, strategies and actions in the National Park and therefore provides a framework for the LDP. Due to the relationship between the two plans the aims are very similar. The vision for the LDP is an expression of those elements of the NPMP vision which can be achieved through the LDP process. The LDP contains both detailed and summary visions which are outlined below.

LDP Detailed Vision
<i>The LDP will guide development in a way which will ensure that within the life of the plan the Brecon Beacons National Park will be a place which:</i>
<ul style="list-style-type: none"> • <i>Continues to be recognised internationally for its value as a protected area, whose character continues to be shaped by the long-standing interactions between people and the processes of nature.</i> • <i>Continues to be widely acclaimed for its natural beauty, geodiversity, biodiversity, and cultural heritage which are being conserved and enhanced by its stakeholders through traditional and innovative means.</i> • <i>Continues to be a sought-after destination providing an outstanding variety of sustainable opportunities for all to understand and enjoy its tranquillity, rural character, Welsh way of life, sense of remoteness, and other special qualities.</i> • <i>Promotes an approach to development which ensures that that National Park of the future is able to be resilient, open, and responsive to change - particularly climate change - and can be proactive in mitigating and adapting to the effects of undesirable change.</i> • <i>Promotes an approach to development which enables our communities to be less dependent upon external supply chains leading to increased food and energy security locally, improved quality of life, community cohesion and conservation of natural capital.</i> • <i>Continues to be a living landscape where innovative approaches to sustainable development and renewable energy are encouraged and tested for the benefit of the environment, the economy, and local communities.</i> • <i>Managed sustainably through active partnerships among the Park's stakeholders so that it continues to be a source of inspiration and enjoyment for future generations.</i> • <i>Has appropriate monitoring systems in place to ensure that development and plan policies are monitored over the long term to improve future policy development.</i>

⁸ Sustainably: respecting the limits of the planet's natural resources, its environment and its biodiversity whilst having regard for social and economic concerns such that all actions taken to meet our needs today do not compromise the needs of future generations.

LDP Summary Vision
<i>The LDP will seek to ensure that...</i>
<i>The Brecon Beacons will be a place where the special qualities of the National Park are protected and enhanced for future generations. Everyone who lives, works or visits the Park will experience a prosperous and vibrant area while the impact on the local and global environment is minimised.</i>

2.3.3 The Local Development Plan Strategic Objectives

In order to achieve the vision for the Brecon Beacons National Park, the following strategic objectives have been developed (Table 2-1). These objectives are at the centre of the LDP and inform the selection of the Preferred Strategic Development Option and the development of the Strategic Policies.

Table 2-1: LDP Strategic Objectives

National Park Purposes; Special Qualities; & Potential for Growth	<p>Special Qualities <i>To conserve and enhance the special qualities of the Brecon Beacons National Park.</i></p>
	<p>Location of Growth <i>Encourage development in sustainable locations near facilities and services therefore minimising the need to travel, whilst also respecting the National Park purposes and special qualities.</i></p>
	<p>Sustainable Use of Land <i>Encourage development on previously developed land in preference to the development of Greenfield land.</i></p>
	<p>Landscape <i>To ensure that all future development will protect and enhance the beautiful and varied character of the Landscape.</i></p>
	<p>Built Environment <i>To ensure that all development affecting the historic environment enhances the historic landscape and traditions of the built environment whilst also taking appropriate account of the requirements for sustainable design.</i></p>
	<p>Cultural Heritage <i>Conserve and enhance the cultural heritage of the Park's communities including use of the Welsh language.</i></p>
	<p>Biodiversity <i>Conserve and enhance the rich and complex biodiversity of the Park.</i></p>
	<p>Geodiversity <i>Protect and enhance the geological resources of the Park, including the European Geopark.</i></p>
	<p>Infrastructure <i>To ensure adequate provision of utilities for local communities and future developments</i></p>

	<p>Natural Resources <i>To ensure that air, water and soil resources will be used in a sustainable manner in all new development, and that standards for soil and air quality are maintained at a high level.</i></p>
	<p>Waste <i>To ensure people and organisations reduce, reuse and recycle waste whilst also encouraging local waste and recycling facilities. To resist regional waste facilities in accordance with the Regional Waste Plan.</i></p>
	<p>Minerals <i>To protect the National Park against new mineral workings and extensions to existing mineral workings, whilst also safeguarding appropriate mineral resources from sterilisation.</i></p>
Sustainability and Climate Change	<p>Climate Change <i>To ensure that the National Park is resilient and responsive to drivers of change and proactive in limiting and mitigating the effects of climate change.</i></p>
	<p>Renewable Energy <i>Encourage developments to make use of renewable energy resources and to encourage small to medium scale community led renewable energy projects.</i></p>
	<p>Sustainable Design <i>Improve the physical quality, energy efficiency, accessibility and sustainable design and construction of all development throughout the Park; Promote a sustainable settlement pattern which enhances the special qualities of the National Park.</i></p>
	<p>Flooding <i>To ensure the location of development does not result in unacceptable flood risk.</i></p>
Foster the social and economic well-being of local communities	<p>Housing <i>Provide for the overall housing requirements through a mix of dwelling types, catering for identified needs and which promotes integrated and thriving communities</i></p>
	<p>Affordable Housing <i>To ensure that good quality, affordable housing of all types will be accessible to the Park's communities where there is an identified need.</i></p>
	<p>Employment <i>Provide for a sustainable economy with strong links between local employment opportunities and housing supply.</i></p>
	<p>Transport <i>To promote development which is supported by sustainable transport initiatives and reduce the reliance on private motor vehicles.</i></p>
	<p>Tourism <i>To support a sustainable tourism industry that contributes to the public's enjoyment of the National Park.</i></p>
	<p>Retail <i>To maintain and enhance the vitality and viability of the town centres in the National Park through the identification of prime retail cores.</i></p>

	<p>Sustainable Communities <i>Promote integrated communities with sustainable access to a wide range of facilities and services.</i></p>
	<p>Health and Wellbeing <i>Enable development opportunities in locations that encourage a healthy lifestyle and promote wellbeing.</i></p>

2.4 Deposit LDP

As part of the LDP preparation process, the NPA have produced 'a Deposit LDP' which sets out the future development strategy for the National Park.

2.4.1 Spatial Strategy and Policies

The Deposit LDP contains the following strategy for the location and scale of development in the Park.

Sustainable Living in a National Park Landscape
<p><i>We want to ensure that all the Communities in the Park are assured of a vital and sustainable future and are able to meet their day to day needs within the local community. We want to ensure that all development in the Park is able to adapt to the likely effects of climate change beyond the plan period. In order to do this we will ensure that all development takes account of future risks of flooding, is intelligently sited, climate responsive, built with sustainable materials, resource efficient and accessible to all for the lifetime of the development.</i></p>

The spatial distribution of development is implemented at a strategic level through policy SP10 'Sustainable Distribution of Development'. The purpose of this policy is to:

- Address how the spatial strategy will be translated into the spatial distribution of development across the Park:
- Set out a hierarchy of locations for development which are considered to be the most sustainable: and
- Determine at a strategic level the scale of growth appropriate for housing, employment, retail and community facilities in relation to the hierarchy.

The spatial strategy is accompanied by a series of other strategic policies which are intended to provide a policy framework which will deliver development which will meet the Strategic Objectives. The Strategic Policies are not intended to be a detailed set of policies to cover every eventual issue affecting development proposals. They seek to focus solely on those issues which must be addressed at a strategic level in order to set out the strategic direction of the Plan and to implement the chosen Strategic Option. Where further guidance is appropriate detailed policies have been developed.

The elements of the LDP have been formulated into the following categories:

1. Spatial Distribution of Development (i.e. spatial policies);
2. Policies applicable to all development (i.e. national park policies); and
3. Topic specific policies.

2.4.2 Site Allocations

BBNPA have undertaken a consultation exercise in which candidate sites have been put forward for consideration for inclusion in the Deposit LDP. The sites have been assessed using a multi-stage methodology against a series of criteria, a process which has resulted in the identification of sites that have been included in the LDP. These sites cover the following range of uses:

- Employment;
- Mixed-use;
- Residential – for both current and phased delivery through the life of the LDP; and
- Affordable housing.

2.5 Post-Deposit LDP Changes

Following the consultation on the Deposit LDP in late 2010, and prior to the finalisation of the LDP for adoption, a number of changes to the LDP were proposed at the following stages:

- Proposed Focused Changes – October 2011;
- Additional Focused Changes – September 2012; and
- ‘Matters Arising’ Changes – June 2013.

The Local Development Plan that the National Park Authority will be considering for formal adoption incorporates the Focused Changes, the Additional Focused Changes and the recommended Matters Arising Changes. As stated in the Inspector’s Report on the Examination into the Brecon Beacons National Park Authority Local Development Plan, the Local Development Plan subject to these changes provides an appropriate basis for the planning of the National Park up to 2022.

3 Environmental and Sustainability Planning Context

3.1 Introduction

This section summarises the findings from the SA scoping stage. The scoping process seeks to ensure that the Sustainability Appraisal encompasses the key sustainability issues relevant to the Park in the context of the development plan system. This section provides the environmental and sustainability context by:

- Examining the relationship of the LDP with other policies, plans and programmes, to identify all relevant environmental protection objectives and to identify potential conflicts to be addressed within the plan-making process; and
- Assembling baseline data on the current and future state of the Park for the sustainability topics which may be affected by the LDP.

3.2 Review of Policies, Plans and Programmes

The SEA process requires authorities to review the requirements of policies, plans and programmes (PPPs) relevant to the content of the Plan. Appendix B provides full details of all the documents reviewed and Section 3.3 summarises the key issues.

3.3 Key Issues from PPP

The key issues and opportunities identified for the LDP in the review of policies, plans, and programmes include:

3.3.1 International and European context

The Plan must conform to EU directives in relation to: SACs (NB: There are no SPAs in the Park), water quality, greenhouse gas emissions, air quality, noise and waste. The Water Framework Directive which requires all inland and coastal waters to reach "good status" by 2015 by establishing a river basin district structure within which demanding environmental objectives will be set, including ecological and chemical targets for surface waters. The LDP should address the causes of some waters being biologically less than 'good' and chemically less than 'very good'.

The thresholds for noise based on noise maps and plans have not been exceeded. The Common Agricultural Policy reform will influence the Park's landscape, agriculture, biodiversity, and economy through farmers' compliance with it. The European Landscape Convention requires landscapes to be taken into consideration through planning activities.

3.3.2 UK National Context

The Plan must conform to UK environmental, human rights and disability legislation. Among other elements, the LDP should contribute to the reduction in CO₂ emissions. It will also require Disability Equality Impact Assessment. The Countryside and Rights of Way Act will also form a context for any policies for public enjoyment of the Park.

3.3.3 Welsh National Context

The Plan should help deliver the outcomes of the Environment Strategy for Wales: integrating environmental considerations; providing environmental education and information; encouraging responsible behaviour; minimising greenhouse gas emissions; minimising waste generation, promoting reuse and recycling and providing for waste management; managing water resources; safeguarding soil; minimising the impact of mineral working – all in the context of the Wales Spatial Plan. Recently published Planning Policy Wales (Edition 2) puts increased focus on tackling climate change through the planning system.

The Plan should be prepared in accordance with the NPA's Welsh Language Scheme, prepared under the Welsh Language Act, and must conform to Welsh planning policy and guidance.

3.3.4 Regional and Local Strategies

The Unitary Authorities' Community Strategies and the Brecon Beacons NPMP will form a context for the Plan, and relevant aspects will be incorporated into it. The neighbouring authorities Unitary Development Plans or Local Development Plans also provide context for the NP LDP. The LDP needs to understand the neighbouring authorities' plans for any strategic growth or other developments close to the border of the Park.

The Park area falls within areas covered by three of Wales' four regional transport consortia (South East Wales Transport Alliance (SEWTA), Transport Consortium for Mid Wales region (TRACC) and (South West Wales Integrated Transport Consortium (SWWITCH)). Regional Transport Plans have been developed by these three bodies and their objectives and measures will need to be taken into account. The Park also falls within areas covered by two of Wales' Regional Waste Strategies (South East Wales and South West Wales). Both of these strategies aim to minimise the adverse impacts of waste on the environment and human health.

The full description of the other PPPs reviewed can be seen in Appendix B.

3.4 Baseline Data

It is fundamental to both the SA and SEA that baseline information is collected to assist in the identification of sustainability and environmental issues/opportunities in the Park. It is also important to consider the implications of the LDP in its wider context. Baseline data is required to establish the present state of the National Park and its surrounding area and will be used subsequently for comparative purposes when monitoring and evaluating the LDP and the future state of the Park.

Baseline data sets have been collected from various international, national, regional, and local sources (Appendix A). These data sets span the range of issues associated with the Park's two statutory purposes and its duty, and simultaneously address sustainability and environmental issues pertinent to both the SA and the SEA. Several of these data sets have been used to inform the most recent BBNP State of the Park Report (2006). Additional or alternate data sets may be analysed and used as indicators for future state of the Park reports. It is worth noting that this initial baseline data report will expand and improve as new data sets become available. The NPA is gathering further evidence to support the preparation of the LDP and this new information, along with other

new baseline information (e.g. LANDMAP studies) will feed into future SA/SEA assessments. All data gathered through this process will inform the Baseline Data Report available in Appendix A.

3.5 Environmental Characteristics and Trends of the Park

The baseline data assembled for this SA/SEA builds on the information compiled in the BBNP State of the Park Report 2006. This report can be accessed at <http://www.breconbeacons.org>.

The Baseline Data Report (Appendix A) is divided into sections based on three of the principles of sustainability as they apply to the LDP via the SA and SEA processes. These principles are: living within environmental limits, ensuring a strong, healthy, and just society, and achieving a sustainable economy. The Baseline Data Report includes data, trends and their significance for the Park, and how the LDP (and NPMP) should deal with them.

There have been difficulties in obtaining Park-specific data due to the fact that much information is collected for Unitary Authority (UA) areas and the Park straddles nine UAs. Data relevant to the Park are often amalgamated within larger data sets for areas or conditions not representative of the Park. Consequently, resulting trends from these broader data sets do not always accurately portray conditions or trends within the Park. Separating data relevant to the Park from the broader data sets presents logistical and financial challenges. But, some of these challenges are worth engaging to better characterise the state of the Park and manage it in the future. For many indicators we have used data for Powys, Monmouthshire and Carmarthenshire as these authorities cover the majority of the Park's area. For many potential indicators identified in Table 5-2, data sets may be unavailable or of poor quality.

There are several other sources and topics that could be included in the baseline data report, but due to data unavailability and/or time constraints, they are not present in the baseline appendix. In many cases this is because the data is available at local authority level but not at NP level. As new baseline data becomes available the SA/SEA will be updated where possible, at each stage of the SA/SEA process.

Key information relating to the SA/SEA topic has been summarised in the following sub-sections. The key sustainability and environmental issues affecting the National Park identified in the Baseline Data Report have been included in the SEA framework set out in Section 5 below.

3.5.1 Climatic Factors and Natural Resources

3.5.1.1 Air Quality

The Unitary Authorities carry out Updating and Screening Assessments (USAs) to determine if there are 'hotspot' locations where there is potential for air quality objectives to be exceeded. An updated data set is forthcoming at Carmarthenshire, however for the remaining UAs, data shows that the air quality in the Park does not exceed the air quality objectives and is up to standard in the Park. In 2005, approximately 73% of sensitive UK habitats were at risk from

acid rain and 66% from the fertilising effects of nitrogen⁹. Even after major reductions in releases of key pollutants, it is likely that a substantial proportion of these habitats will remain a risk. Nine of the SAC sites within the Park are in an unfavourable condition which could be due to these habitats reaching critical loads of nutrient nitrogen and acidity.

There are not any current ammonia monitoring sites in the BBNP, however the three sites that are in close proximity to the Park, which are Llyn Brianne (Powys), Holme Lacy (Herefordshire) and Penallt (Monmouthshire), show that the levels of ammonia are well under the critical threshold of 8.0ug/m⁻³.

3.5.1.2 Climate Change and Greenhouse Gas Emissions

The UK Climate Impacts Programme has identified that the global temperature has risen by 0.6°C since the beginning of the twentieth century and over the last 30 years winters have been getting warmer and summers drier¹⁰. Most of Wales and the Park are slightly colder in winter than the extreme western coast, slightly warmer in summer and the growing season is slightly shorter (240-320 days as opposed to 320-365 days on the extreme western coast). The east of the Park (east of a north – south line drawn through Llangynidr in the Park) has a climate that becomes less humid, with colder winters (snow lies longer here), with considerably hotter and drier summers and soil temperatures getting up to 20°C, which is warm enough to permit the growing of cereals and other arable crops, with good yields¹¹.

Winters over the last 200 years have become much wetter relative to summers throughout the UK. By the 2080s, summer rainfall in the Park is predicted to decrease by over 15%, maybe over 45% in East Wales, while winter rainfall is predicted to increase, perhaps by more than 15%. This would increase run-off and may also cause increased erosion, loss/changes to habitats and water quality (eutrophication) problems. Droughts followed by flooding would have adverse impacts on soils, rivers, lakes and wetlands.

Global warming is recognised as one of the greatest environmental threats facing the world today. Carbon dioxide (CO₂) accounts for the greatest proportion of greenhouse gas emissions in the UK. Despite a reduction since 1990, UK targets for reducing them were not being met as they were expected to start increasing again after 2005. Table 3-1 shows the estimated amount of carbon emissions in Wales from 1990 to 2002 which is on the decline.

Table 3-1: Estimated emissions, million tonnes carbon equivalent¹²

1990	1998	2000	2002
14.0	13.9	14.7	12.8

⁹ Environment Agency, Air Quality (2005)

¹⁰ UKCIP (2002)

¹¹ Ellis, R.G., (1983) Flowering Plants of Wales, National Museum of Wales (based on Bioclimatic Map of Wales, reproduced by permission from Bendelow, V.C. and Hartnup, R. (1980) Climatic Classification of England and Wales, Soil Survey Technical Monography No. 15, Harpenden 1980).

¹² Key Environment Statistic for Wales, WAG, 2007

Data on the level of CO₂ emissions estimated per capita for 2006 in Powys, Carmarthenshire and Monmouthshire are listed below¹³:

- Powys: 1,105kt CO₂
- Carmarthenshire: 1,692kt CO₂
- Monmouthshire: 932kt CO₂

3.5.1.3 Ecological Footprint

The average global ecological footprint is 2.7 global hectares (gha) per person¹⁴, while there are only 1.8 hectares of biologically productive area per person available on the planet¹⁵. In 2006, Wales' overall ecological footprint was 4.41 gha per person, which reduced from 5.06 gha in 2003. The three authorities that have significant percentages of the Park's population are Powys, Carmarthenshire and Monmouthshire, and respectively, their ecological footprints are 4.68 gha per person, 4.39 gha per person and 4.68 gha per person¹⁵. At a local authority level, Blaenau Gwent has the lowest ecological footprint of 4.02 gha per person in 2006 which is still substantially more than at a global level.

Housing accounts for 25% of the 5.16 gha per person's ecological footprint of Wales. At a local authority level Torfaen has the highest ecological footprint for housing at 1.28-1.33 gha/capita and the Vale of Glamorgan has the lowest at 1.09-1.15 gha/capita. Transport makes up 18% of the total ecological footprint of Wales. The average distance people travel each year is growing at a considerable rate and as a result the transport footprint (i.e. the part of the ecological footprint which covers personal travel behaviour and spending on transport infrastructure) is predicted to increase by 2020. Even with efficiency improvements in cars the transport footprint is estimated to increase by over 6% by 2020. Including air travel increases this to over 12% over the same time period¹⁶.

3.5.1.4 Renewable energy

The BBNPA have recently calculated that if there were a few combined heat and power plants, it could generate up to 5.35 megawatts of electricity, enough to supply 63.5% of the Park's households. It is also additionally feasible to generate 244 kilowatts of hydro-electricity to supply 2.7% of the Park's households. The Park's first community renewable energy scheme was approved in 2004. By the end of 2007, three hydro, six photo-voltaic, 40 solar and five wind (single turbine) renewable energy schemes were in place in the National Park. More recently, interest and implementation of micro-generation schemes has increased dramatically through community-led initiatives associated with the Green Valleys Project.

¹³ Defra, Emissions of Carbon Dioxide for Local Authority Areas

¹⁴ State of the Environment, Stats Wales, 2009

¹⁵ EPA Victoria, Ecological Footprint

¹⁶ Stockholm Environment Institute, Wales' Ecological Footprint – Scenarios to 2020, 2008

In 2008, there were 24 operational onshore and one offshore wind farms in Wales. Three onshore wind farms are under construction, and six onshore and two offshore consented projects. A further 19 onshore wind farms are in the planning stages. There are no multiple turbine wind farms within the Park; however the potential effects of any future wind turbines would need to be assessed for their impacts on landscape and biodiversity.

3.5.1.5 Water Quality

Under the EU Water Framework Directive (WFD), water quality assessments are being published using a new, tougher methodology. It uses a principle of 'one out, all out' which means that the poorest individual result drives the overall result. It is also based on a wider range of assessments reporting on over 30 measures, grouped into ecological status (including biology and 'elements' such as phosphorus and pH) and chemical status ('priority substances'). Figure 3-1 shows the overall WFD status of water bodies in the National Park. Of the 82 water bodies in the Park, 29% were given a 'good status', 56% a 'moderate status', 13% a 'poor status' and 1% a 'bad status'.

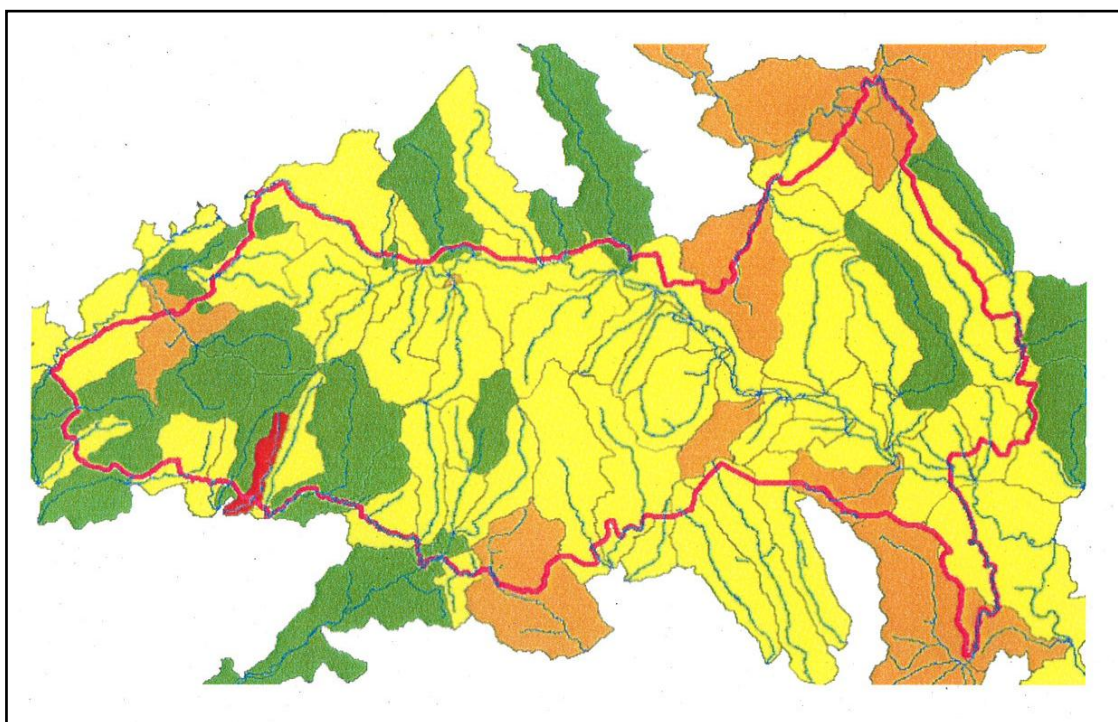


Figure 3-1: Map showing Overall Water Framework Directive Status of Water Bodies in the National Park¹⁷

Key: Blue – High Status, Green – Good Status, Yellow – Moderate Status, Orange/Brown – Poor Status, Red – Bad Status

The River Basin Management Plans for Western Wales and the Severn, which cover the National Park Area state that the main reasons why water bodies are not achieving good ecological status are:

¹⁷ Environment Agency Wales Planning Liaison Officer

- Diffuse sources, including agricultural, mixed urban run-off, contaminated land (inc. landfill, excl. disused mines), natural mineralisation
- Disused mines point and/or diffuse source
- Physical modification, including land drainage, urbanisation, barriers to fish migration, flood protection, water storage and supply (including for power generation)
- Point source water industry sewage works
- Acidification from forestry and acid deposition

3.5.1.6 Water availability

The main sources of water within the National Park include the River Wye, the River Usk and the River Tywi which are all Special Areas of Conservations (SACs) and are therefore accorded the highest level of statutory protection. The River Usk is 121km long and is one of the largest rivers in Wales. The Usk Catchment Abstraction Management Strategy (CAMS) area encompasses approximately 1169km² of mostly rural landscape over 5 local authorities. The River Usk and its upper tributaries have been designated as a riverine SAC, as the habitat provides for nine rare or threatened nationally and internationally important species. The River Usk and its main tributaries are also recognised as a SSSI.

The Usk catchment has been split into three areas of water that can be managed as individual units; the River Usk, Sor Brook and Malpas Brook. The River Usk and Bettws/Malpas Brook Water Resource Management Units are both deemed to be over licensed. The current level of abstraction means that there is no water available at low flows and therefore if further licences were to be issued they could cause unacceptable environmental damages. Water may be available at high flows, with appropriate restrictions. Sor Brook has water available and therefore water is likely to be available at all low flows.

WRMU name	Associated main river	Resource Availability Status				Details of the WRMU are on pages
		Individual WRMU status	Integrated WRMU status	Target status in 2013*	Target status in 2019*	
1	Sor Brook	Water Available	Water Available	Water Available	Water Available	23-25
2	River Usk	Over Licensed	Over Licensed	The Usk Habitats Directive RoC process will determine the level of abstraction where 'no adverse effect' on the integrity of the SAC can be concluded. Please see Section 4.2 for further details.		26-29
18	Bettws/Malpas Brook**	Over Licensed	Over Licensed	Over Licensed	No Water Available	30-33

* For WRMU 2, the level of abstraction determined through the Usk Habitats Directive RoC process is not a CAMS resource availability status target but a level that must be achieved in order to satisfy the Habitats Regulations.

** The name of the watercourse changes from Bettws Brook to Malpas Brook after flowing through Bettws village.

Figure 3-2: Overview of existing water resource availability and target water resource availability at low flows for the Usk Catchment¹⁸

The Environment Agency is currently in the process of reviewing all existing consents to ensure there are no adverse effects on the nature conservation interests of designated sites such as Special Areas of Conservation (SAC) and

¹⁸ Environment Agency (2007) The Usk Catchment Abstraction Management Strategy <http://publications.environment-agency.gov.uk/pdf/GEWA0307BLTO-e-e.pdf?lang=e>

Special Protection Areas (SPA). The review of consent for the River Tywi found that five discharges to water, four water abstractions and two air quality permissions had the potential to affect species and habitats of the SAC. However, proposed modifications to these consents along with changes to the ways that operators practice will prevent further impacts. The review of consents for the Rivers Usk and Wye are not yet available.

During 2007/08 the reservoir stocks based on storage at the Big Five Group, Brenig, Brianne, Celyn and Elan Valley Group reservoirs were higher than the 1995/96 stocks by as much as 35%. These reservoirs are located at varying distances from the Park and supply a growing demand to parts of the UK such as Liverpool and Birmingham. Llyn Brianne is the closest in proximity to the Park and regulates the flow in the River Towy which flows south-westwards through Carmarthenshire.

3.5.1.7 Flood Risk

Around 5 million people in 2 million properties live in flood risk areas in England and Wales. The Park has a significant area of flood risk zone C2¹⁹ (Figure 3-3). These are areas of floodplain with a high risk from flooding but without a significant flood defence infrastructure. In the Park, the percentage of allocated development land on indicative floodplains have halved from 29% in 1999 to 9.5% in 2006. There are smaller areas of Zone C1 (areas of floodplain having a high risk from flooding which tend to be developed and protected by flood defences) and Zone B (areas known to have flooded in the past evidenced by sedimentary deposits).

There is an increased risk of flooding as a consequence of climate change. Development on the flood plains makes future occupants vulnerable to the risk and reduces the capacity of the river systems to cope with the excess water. Catchment Flood Management Plans (CFMP) have been produced for the Usk and Wye, the Taff and Ely catchment, the Loughor to Taff catchment, the Eastern Valleys catchment and the Ogmore to Tawe (including Thaw and Cadoxton) catchment.

¹⁹ TAN 15

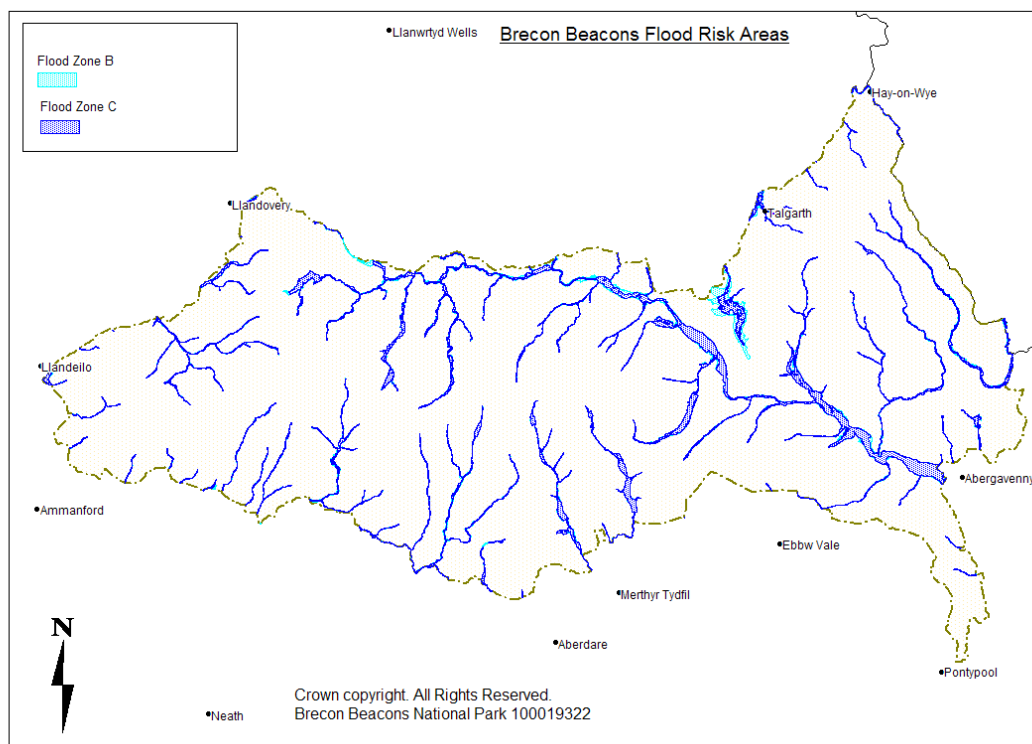


Figure 3-3: Brecon Beacons flood risk areas²⁰

3.5.1.8 Groundwater Vulnerability/ Source Protection Zones (SPZ)

Groundwater vulnerability relates to areas where water-bearing rocks (aquifers) are vulnerable to pollution because of the type of soil cover which occurs above them. Major aquifers are capable of yielding large quantities of water for abstracting, whilst minor aquifers are capable of providing lower yields. The majority of the Park is made up of aquifer bearing rock with an area along the southern fringe of the Park being a major aquifer.

Source Protection Zones (SPZ) show the risk of contamination from any activities that may cause pollution in the area. The closer the activity is, the greater the risk of pollutants entering the water. Within the Park, there are 16 SPZs, located at Halfway, Brecon, Penderyn, Llyad Llŵchwr, Rock Spring, Shon Sheffery, Rhymney Bridge, Ffynnon Gisfaen, Llanover, Llanwenarth Citra, Llwyn Du, Tynywern, Cwn Cegyr, The Wern, Llanbedr Springs and Llanthony.

3.5.1.9 Contaminated Land/Landfill/Quarries

No contaminated land has been identified in the Park, according to information received from the Unitary Authorities, which are responsible for collecting it.

There are no operational landfill sites in the Park, however there are several old landfill sites that are no longer used.

The numbers of working quarries and mines decreased between 1975 and 2005. In 1975, there were 9 limestone quarries, however only 2 remain due to the decline of the steel industry and aggregates market forces. Since 2005, there

²⁰ BBNPA GIS Data – as supplied by Environment Agency Wales

has been an increased demand for local building stone which has encouraged some small quarries to open or reopen.

3.5.1.10 Waste

Levels of reuse/recycling/composting in Powys and Monmouthshire (which account for 91% of the Park's population) were 41.3% and 38.5% respectively in 2008/9. Levels in Monmouthshire continue to rise year on year, whilst in Powys there has been a slight fall since a peak of 42.4% in 2006/7.

In 2004 all of the Park's waste went to transfer stations, treatment facilities and landfill sites outside the Park. The only licensed treatment or disposal site in the Park is a cardboard incinerator which only takes material from the operating company. The civic amenity sites serving Park residents are just outside the boundary except for a privately run civic amenity site in Brecon. In the Park there are recycling bring-sites in the larger settlements.

3.5.2 Special Qualities and Landscape

The BBNP includes the Black Mountains in the east and Y Mynydd Du (The Black Mountain) in the west. In the south there are some of the plateaux and ridges that form the northern rim of the South Wales Coalfield. The broad valleys of the River Usk cuts across these mountains and the Rivers Tywi and Wye border the Park. The Park covers 520 square miles (1,344 square kilometres) and lies between rural Mid Wales and the industrial South Wales Valleys. The bulk of the Park is underlain by Old Red Sandstone rocks of Devonian age²¹. Fforest Fawr (the Great Forest) is the range of mountains between the Black Mountain and central Brecon Beacons and has become the first Geopark in Wales or in any UK National Park.

3.5.2.1 Tranquillity

The importance of tranquillity to Wales and the Welsh landscape is considerable. In 2009, the total amount of Tranquil Areas in Wales was over 11,600km², representing 55% of the total area of Wales. Between 1997 and 2009, there was a loss of nearly 1,500km² of Tranquil Areas (Figure 3-4). This is over 6% of the total land area of Wales, and is greater than the area of the Brecon Beacons National Park.

²¹ State of the Park (2006)

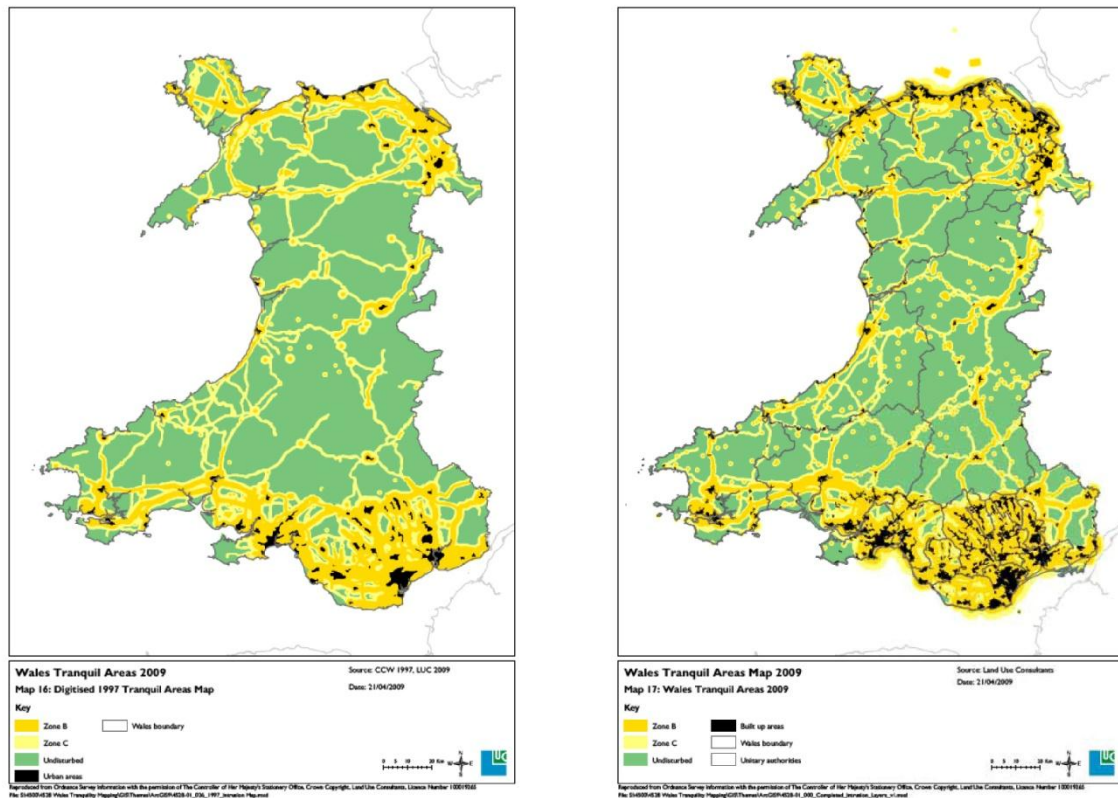


Figure 3-4: Wales Tranquil Areas Maps 1997 and 2009²²

In Figure 3-4, orange shows areas of the countryside that are subject to significant traffic intrusion and other equivalent disturbance. The yellow shows land that would fit within the broad English definition of Tranquillity, but which is not deemed fully tranquil by Wales standards as it is somewhat disturbed by light traffic noise and small settlements. The green shows undisturbed or tranquil countryside that is usually free of any substantial disturbance in daytime, although significant intermittent aircraft noise can occur.

3.5.2.2 Light Pollution

Large parts of Wales, including much of the National Park are among the darkest parts of the UK. A slight increase in light pollution is shown between 1993 and 2000 (Figure 3-5). The red in the figures below indicate areas with the highest levels of light pollution and the dark blue indicate areas where light pollution is not detected. However, although the situation may be improving as non-spill street lighting is being used more often in the Park, especially on major roads outside settlements to reduce light pollution, increasing urbanisation in the Park is counteracting these improvements.

²² Wales Tranquil Areas Report (2009) Prepared for CCW by Land Use Consultants

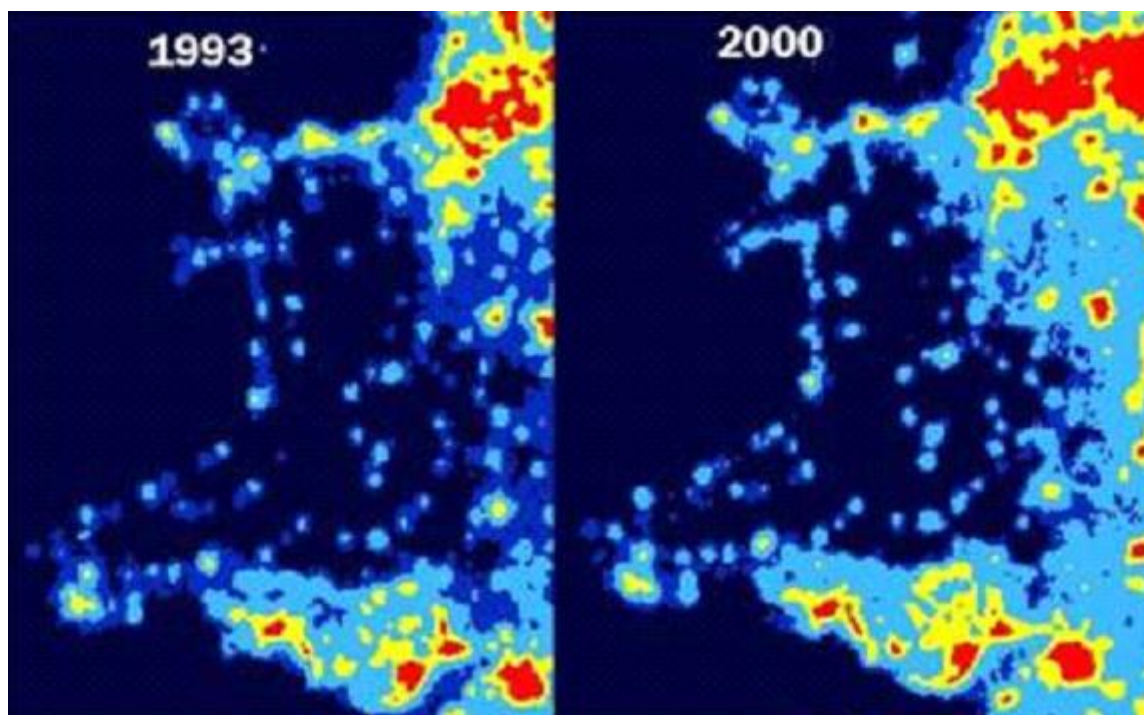


Figure 3-5: Satellite images of Wales showing light pollution²³

3.5.2.3 Common Land/ Other Open Country

Many commons throughout Wales were lost under the Enclosure Acts of the early nineteenth century however there was an increase in public interest in preserving commons in the twentieth century²⁴. Those remaining were legally registered under the Commons Registration Act 1965.

In 2005, 36.7% of the Park was registered common land, and is of supreme importance to the Park as it is the second largest land use type, as well as being the oldest surviving form of agricultural practice. Significant proportions of common land are also SSSIs and other protected sites. Common land is also the basis of upland agriculture and prime recreational use, however most activities require permission from the owner of the land and usually the agreement of the commoners too. Some activities such as riding motorbikes on common land without the owner's permission are illegal.

Open country is important in its own right, as a link between commons and a link between commons and more intensively farmed land. Between 1985 and 2005, there had been an increase in the amount of open country from covering 3.2% of the Park to 5.8%. This increase could be mainly due to the classification of additional land as "open" by the Countryside Council for Wales under the CROW Act.

3.5.2.4 Woodland

The percentage of all types of woodland in the Park has increased from covering 13.8% in 1985 to 14.6% in 2005. The apparent increase of 899 ha could be due

²³ Campaign to protect rural England website 19.7.06

²⁴ Brecon Beacons National Park Authority, Common Land

to the different ways of measuring Woodland, particularly broadleaved, is a very important landscape feature and habitat, which offers climate change mitigation (in young woodland), flood control and water conservation. Broadleaved woodland has increased within the Park from 4.8% in 1985 to 5.7% in 2005.

3.5.2.5 Farmed Land

In 2007, 57.2% of the land within the Park was farmed land, and farming is crucial to all aspects of the Park's qualities, landscape, biodiversity, public enjoyment and its communities. The area of farmed land within the Park has decreased since 2002, whereby 57.7% of the land within the Park was farmed land. While farming in the Park is under stress, as elsewhere, the area of farmed land is not a very good indicator of its health due to the way data is collected. Most of the open country recorded above will also be counted as farmed land.

3.5.2.6 Agri-environment Schemes

Between 2004 and 2005 the area of the Park under Tir Gofal (Wales agri-environment scheme), and the number of holdings in the schemes increased by 15, covering 16% of the Park. The existence, take up, value and monitoring of agri-environment schemes and cross compliance could significantly benefit landscape, biodiversity and other goals. Tir Gofal combines existing schemes such as Environmentally Sensitive Areas and Tir Cymen to encourage farmers to maintain and enhance the countryside. The future of Tir Gofal is uncertain as payments have been affected by the introduction of Tir Cynnal and cross-compliance. The removal of the Tir Mynydd income by 2008 will have an adverse effect on the uplands and hill farms.

3.5.3 Soils and Proportion of High Quality Agricultural Land

Peat and organo-mineral soils act as important stores of carbon and should be afforded protection. The distribution of organo-mineral soils are evenly distributed throughout Wales and a high concentration is found in the Park. Peat soils are concentrated towards the north, and only a small concentration is found in the Park.

Agriculture makes up a relatively small percentage of economic activity in Wales as only 0.2% of Wales' agricultural land is classified as Grade 1 and 2.3% is Grade 2. The majority of the land within the Park is covered by lower grades. 80% of the land is used for farming and forestry and supports other wider countryside activities such as tourism and conservation.

3.5.4 Biodiversity and Geodiversity

3.5.4.1 European Designations

The Brecon Beacons National Park covers an area of biodiversity interest containing 11 internationally important biological Special Areas of Conservation (SAC) (Blaen Cynon, Brecon Beacons, Coed y Cerrig, Coedydd Nedd a Mellte, Cwm Cadlan, Cym Clydach Woodlands, Llangorse Lake/ Lyn Syfaddan, River Usk, River Wye, Sugar Loaf Woodlands, and Usk Bat Sites) covering 2% of the Park. Nine of these have features that are in unfavourable condition with only two having all the features of designation in a favourable condition. The River Tywi is a designated SAC, 1km outside of the BBNP boundary but it is within the potential influence of the plan and should therefore be assessed.

3.5.4.2 National and Local Designations

There are also 64 nationally important biological Sites of Special Scientific Interest (SSSI) covering 15% of the Park (Figure 3-6). Within these SSSIs, there are 82 biological “features of importance”, the condition of which is: 29% ‘favourable’; 55% ‘unfavourable’; 15% ‘unknown’; and 1% ‘partially destroyed’. Of those which have features in unfavourable condition, 24% are recovering, but 24% are also declining (2005). The poor conditions of these SSSIs could be due to the lack of knowledge on how to manage these unique habitats. 22 of the features are on land owned/ managed by the NPA. 17 of these are in an unfavourable condition; however the National Park Authority and public bodies have a statutory duty to have these SSSIs in a favourable condition.

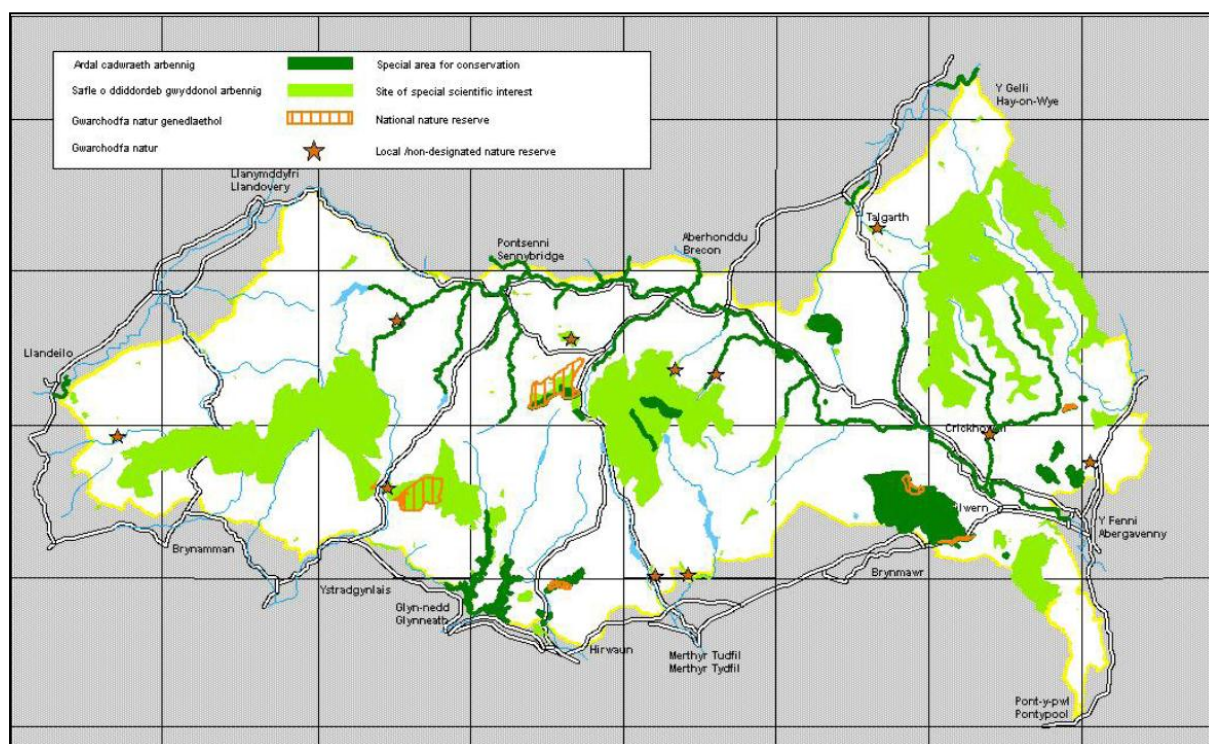


Figure 3-6: SSSIs and Nature reserves in the BBNP²⁵

3.5.4.3 Priority Habitats and Species

The area of the Park covered by UK Biodiversity Action Plan (BAP) habitats is 22%. There are 21 UK Priority habitats and 48 species included in the BBNP Local BAP, 2006. There are 17 habitats of local priority and 27 species. These are the most important habitats and species on which the conservation effort is being concentrated. Further details on LBAP habitats and species are provided in Appendix A.

The law for protecting bats is considerably stricter than it is for most other animals. Since 2007, the effective protection for bats now comes from Schedule 2 of the Conservation (Natural Habitats &c) Regulations 1994. Changes to legislation, and devolution, mean the law is difficult to summarise succinctly

²⁵ BBNPA GIS data September, 2005

across the UK, but the strong legal protection for bats and roosts remains²⁶. The main threats to bat populations are if there is a high rate of redevelopment. The only way to reduce the risk is to require ecological surveys for all such buildings, irrespective of whether or not evidence for bats has been found previously.

Four species of bat have been identified in the Park. The Lesser Horseshoe bat is a SAC and LBAP mammal. In 2005, 12-15 known nursery sites were identified and approximately 1,100 breeding females. Their numbers vary on location as there is an upward trend on the River Usk valleys sites, whilst the Wye valley sites are more at risk. The Common Pipistrelle bat is another LBAP mammal and data from 2005 shows that it is widespread throughout the Park. The Daubenton's bat and the Noctule bat have declined due to disturbance of habitats, loss of tree roosting sites and food availability.

The Local Biodiversity Action Plan (LBAP) for habitats and species show the types of habitats and species found within the NP. Table 3-2 summarises the amount of hectares (ha) each habitat covers within the Park, the number of species, breeding pairs and for those that the number is unknown, their location and habitat type. The complete table is available in Appendix 1a.

Table 3-2: Local Biodiversity Action Plan Habitats and Species

Local Biodiversity Action Plan Habitats and Species	
Habitat Action Plans	
First Tranche 2000	Extent in the National Park
Acid grassland	2,400 ha of lowland acid grassland, (6% of the total cover for Wales).
Calcareous grassland	Lowland: 120 ha but probably under recorded. Upland: 490 - 500 ha
Cliff, rocks and scree	No quantitative data.
Dwarf shrub heath	Upland heath: 9,600ha - about 14% of the Welsh resource (5630ha dry heath, 660ha wet heath, 3,320ha grass-heath mosaic). Lowland heath: 410 ha (41ha dry heath, 120ha wet heath, 250ha grass heath mosaic).
Limestone pavement	41 ha
Neutral grassland	124ha
Raised and blanket bog	Raised bog: 0.8 ha, with 17 ha of modified wet bog. Blanket bog: 1,093 ha, including 11 ha in the lowlands. In addition, there are a further 2,027 ha of wet modified bog, 1,832 ha of dry modified, 119 of bare peat and 3859 ha of degraded blanket bog.
Reed-beds	11 ha
Rhos pasture	2,300 ha
Rivers and streams	The Upper Usk SSSI covers about 300ha within the Park.

²⁶ Naturenet, Bats and the Law

Woodland (native beech, wet woodland, upland ash, upland oak and lowland mixed broadleaf)	Upland ash woodland: 630ha Upland oak woodland: 2,800ha Wet woodland: 1,100ha Native beech woodland: 300ha Lowland broadleaf woodland: 952ha
Second Tranche	Extent in the National Park
Action plans under development for Ancient species rich hedgerows, Bracken, Buildings and gardens Caves, Cereal field margins, Coniferous woodland (for birds), Fen and swamp, Flushed and tufa springs, Linear habitats, Standing open water and Scrub	
Species Action Plans	
Curlew	Approximately 20-25 pairs.
Dormouse	Low numbers in Wales, where it occurs at the western extremes of its geographical range.
Golden Plover	Approximately 10 pairs.
Earthtongue	It occurs in heavily grazed turf on the North Crop Limestone in the BBNP
Lapwing	55-65 breeding pairs.
Lesser horseshoe bat	Concentrated in the lowlands. Some hibernation sites being found at higher levels within the cave systems.
Marsh fritillary	16 colonies recorded since 1990.
Nightjar	Occurs at two sites, Pant Mawr and Glasfynydd, in the National Park. (Approximately 10 churring males in total.)
Otter	Good populations in the River Usk with most tributaries utilised. The 1991 Survey of Wales found otters signs at 66% of sites within the NP but now more recent local surveys suggest 80% is now a more likely figure.
Red wood ant	Recorded at 3 sites with a total of 27 nests
Twaite and allis shad	Shads may migrate and spawn as far upstream as Crickhowell, though there are no confirmed spawning sites within the NP.
Water vole	Monmouthshire-Brecon Canal - sightings at Brecon, Llanfrynach, Govilon, Gilwern and Cockalofty (Black mountains).
White clawed crayfish	High.
Action plans under development for Bechstein's bat, greater horseshoe bat, river jelly lichen, arched earthstar, slender green feather moss, pink meadow cap and violet crystalwort.	

3.5.4.4 Geodiversity

In 2005, there were 19 geological SSSIs covering 12% of the Park. Within this area there were 37 features of importance, of which 51% is in an unfavourable condition, 30% in a favourable condition and the remainder is unknown. Geodiversity has been neglected in the past, but has come to prominence with designation of the Fforest Fawr Geopark.

3.5.5 The Historic and Built Environment

Blaenavon Industrial Landscape was designated as a World Heritage Site in 2000 and more than 40% of the site falls within the Park. From the mid-18th Century the people who lived in and around Blaenavon played a leading role in the UK

iron and coal industries and helped change the world through the Industrial Revolution²⁷.

The Park contains four Conservation Areas located within Brecon, Crickhowell, Hay-on-Wye and Talgarth which give protection to unlisted buildings and trees in the area.

In 2005, 1,711 listed buildings, including 29 Grade 1 and 86 Grade 2*, were identified within the Park. The Park also contains 256 Scheduled Ancient Monuments with 95.9% in a stable or favourable condition, 3,700 other archaeological features, 6 Historic Parks and Gardens, 4 landscapes of outstanding historic interest and 3 landscapes of special historic interest. Within the Park, there are 6 areas designated as historic landscapes.

3.5.6 The Park's people, communities and understanding and enjoyment of the Park

The BBNP as an administrative area covers parts of 9 of Wales' 22 Unitary Authorities which are Powys, Carmarthenshire, Monmouthshire, Rhondda Cynon Taff, Merthyr Tydfil, Blaenau Gwent, Torfaen, Neath Port Talbot and Caerphilly. The National Park Authority is the planning authority for the National Park area, while the constituent Unitary Authorities retain responsibility for all other local government services within their areas of the Park. The NPA therefore works in close partnership with these authorities, who all (except those with no population) appoint members to serve on the Authority.

The Park's resident population in 2001 was 32,295 which had increased to 32,909 in 2005. The Park's population has a predicted negative natural change but has increased by net in-migration and it is predicted to rise to 35,059 by 2016. This combined with a predicted fall in average household size gives a predicted rise in the number of households of 2,040 over the same period.

Figure 3-5 shows the demography of the Park's population compared to the demography of Wales in 2001. The Park had a lower proportion than Wales of females in all age groups up to 30-34 and a lower proportion of males in all age groups from 55-59 to 90 plus. The birth rate in the Park is slightly below the Welsh rate and the proportions of people in age groups over 60 are slightly higher. The resident population of Powys in the Park has slightly increased from 68% in 1991 to 20% in 2000. The relative increase in Powys could be due to the greater availability of housing land in this area, which comprises 66.1% of the Park.

²⁷ Blaenavon Industrial Landscape, World Heritage Site

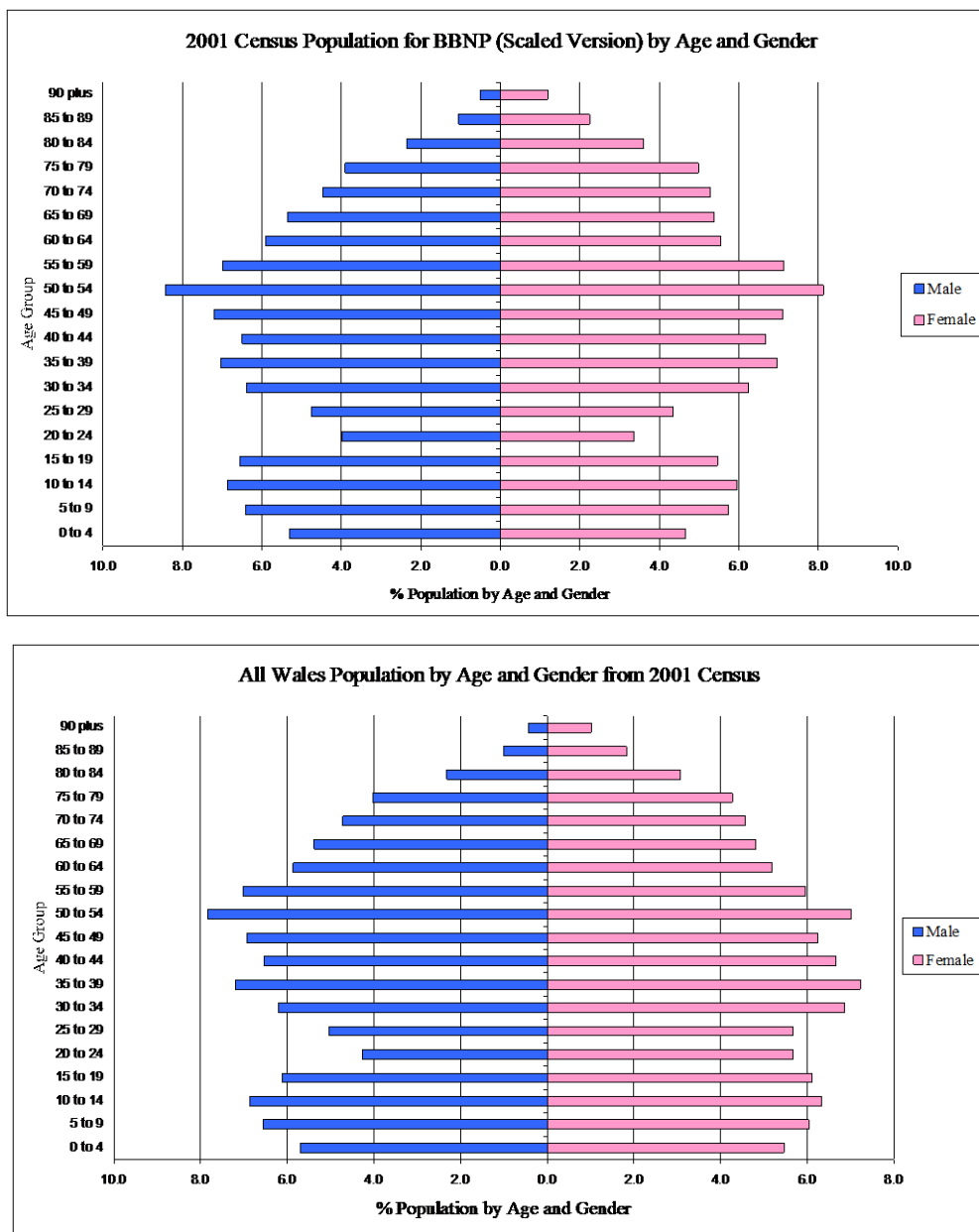


Figure 3-7: Demography of the Park’s population compared to the demography of Wales²⁸

Within the Park there are 42 communities. Village and church halls and/or other meeting spaces available to the community are available in 35 settlements in 25 community council areas.

In 2005, the average house price within the Park’s main postcode areas was £193,492 compared to the Welsh average of £141,860. The average house prices are higher in Powys (which includes 66.1% of the Park) than the Wales average, which is brought down by very low values in the Valleys. Despite prices being higher than the Wales average, the price to income ratio is lower in Powys, at least for smaller properties.

²⁸ 2001 Census of Population & Housing Standard Table SO1, derived for BBNP by Cardiff Research Centre 2003

3.5.6.1 Health

As most of the Park's population live in Powys (70%) or Monmouthshire (21%), the data obtained for these can be used as a guide to the overall health of people living in the Park. Health statistics in Powys shows that it has a better health profile than average for Wales. There is a growing older population that will influence the demand on health services in the future. Education and unemployment are significantly better than the average for Wales, which are key determinants for overall health. Powys also has lower premature death rates than the average for cancer and heart disease. However, Powys has a worse than average rate for road traffic accidents, which could be attributed to the rural environment; this is also the case in Monmouthshire.

In Monmouthshire, the health statistics are significantly better than the Welsh average. It has similar positives as Powys but it also has lower rates for suicide, smoking and premature deaths from cancer compared with the average²⁹.

3.5.6.2 Index of Multiple Deprivation (IMD)

In Wales there are 1,896 Lower Super Output Areas³⁰, within the Park, 50% of the LSOAs present, have a higher overall deprivation ranking than in 2004. In the Park, 38 Super Output Areas (SOAs) were identified, of which 30 fall into the bottom quartile, i.e. the most deprived for overall deprivation. The list below indicates which areas within the Park are the most and least deprived in the income, employment, health, education, access to services, housing, physical environment and the community safety domains.

- The overall most deprived LSOA within the Park is 'Vaynor 1' (Merthyr Tydfil). NB: this LSOA extends outside the Park boundary into Trefechan.
- A large proportion of the LSOAs within the Park are the least deprived in the income domain. The most deprived area within the Park is 'St John 2' (Brecon).
- 20 LSOAs within the Park are the least deprived in the employment domain. 'Vaynor 1' (Merthyr Tydfil), 'Glanaman 2' (Ammanford) and 'St John 2' (Brecon) are the most deprived areas.
- 'Brynmawr 1' (Blaenau Gwent) is the most deprived area in the health domain; however the majority of the LSOAs in the BBNP are the least deprived.
- 'St John 2' (Brecon) and 'Vaynor 1' (Merthyr Tydfil) are most deprived areas within the Park for the education domain, however more than two thirds of the areas are the least deprived.
- Figures show that for the access to services domain, 24 of the LSOAs within the Park are the most deprived, the least deprived area is 'St Mary 1' (Brecon).

²⁹ Wales Centre for Health

³⁰ Lower Super Output Areas (LSOAs) are statistical boundaries used by the Office for National Statistics to provide statistics at a local level. LSOAs fit within Ward boundaries and have a minimum population of 1,000, and a mean population of 1,500.

The majority of the LSOAs within the Park for the housing domain are the least deprived, however the most deprived area is St Mary 1 (Brecon).

- In the physical environment domain, 'Cantref 1' (Brecon), 'Castle and Llanfoist Fawr', 'Gwernyfed' (Brecon), 'Rhigos' (Aberdare), 'Maescar / Llywel' (Brecon) and 'Llangattock' LSOAs are most deprived areas within the Park and 5 areas are the least deprived.
- The majority of the LSOAs within the Park are the least deprived for the community safety domain. The most deprived areas within the Park are 'St Mary 1' (Brecon), 'St John 2' (Brecon) and 'Hay' (Hay-on-Wye).

3.5.7 The Park's economy

Data from 2001 showed that 65.2% of the population within the Park are economically active and 2.7% are unemployed. Of the 34.8% that are economically inactive, 16% are retired. The Park has a slightly larger proportion of economically active people than the Wales average (Figure 3-8).

The most significant employment category in the Park is public administration, and 33.1% of the economically active residents within the Park work within the 'public administration, education and health' sector. During the time period of 1991-2001 there were increases in people employed in the manufacturing, catering and financial services, while decreases were recorded in the agriculture, water and transport/communication sectors.

In agriculture, the number of full time principal farmers has decreased, which will have a negative impact on the availability of skills and resources to carry out land management for conservation. Between 2002 and 2004, there was a slight decrease in most of the aspects of agricultural activity. This was not unique to the Park area, but is part of a wider trend. A continued decrease in farming as a full-time way of life, and in family-run farms might cause changes in the Park's society and an increase in the size of farm holdings could have effects on the landscape and biodiversity.

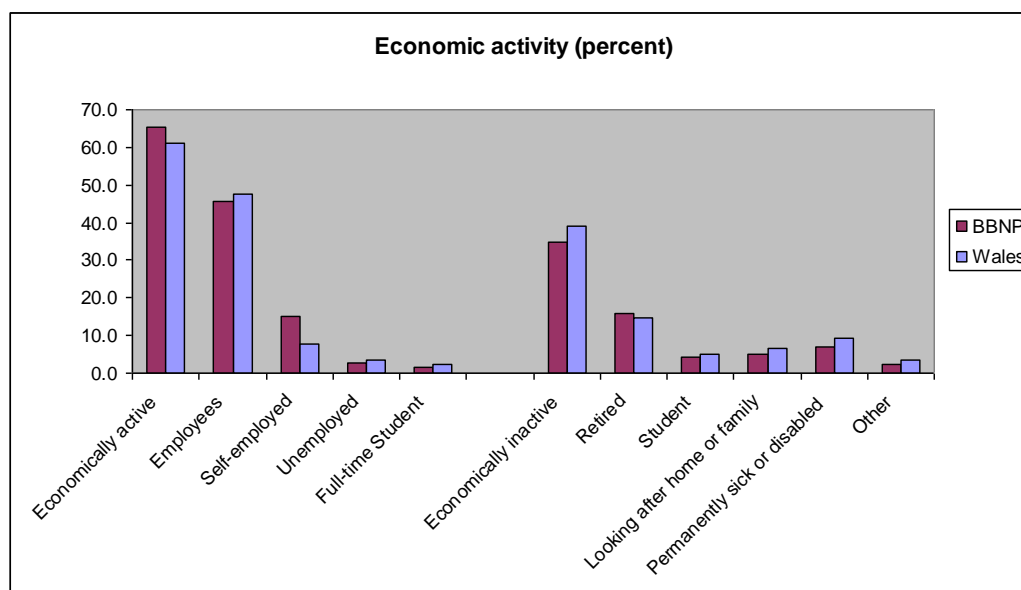


Figure 3-8: Comparing the level of economic activity in the BBNP and in Wales³¹

3.5.8 Sustainable Tourism

Each year the Park is visited by some 3.8 million people who spend around 4.2 million days there³². In 2003/2004, there were a total of 3,975 visitor bed spaces in non-serviced accommodation and 1,686 visitor bed spaces in serviced accommodation. In 2004, there was a substantial increase over 2003 in the percentage rate of occupancy of beds in serviced accommodation during most of the summer months.

The tourism revenue in all sectors of accommodation type had increased from 2001 to 2004, apart from "staying with friends or relatives". Many of the tourism businesses within the Park and the communities that rely on their income benefit greatly from these visits. Tourism revenue had increased in all sectors such as indirect expenditure and shopping from 2000 to 2004, excluding data from 2001, the year of Foot and Mouth.

Amongst other data, visitors to the Park have steadily increased over the last five years (2000-2004) with about 6% pa growth, which is a combination of day and staying visitors. It has been ascertained that open access is a very important recreational resource in the Park, with 47% of the Park being legal open access.

There are various different attractions for visitors to the Park, and this is of significant importance to BBNPA in ensuring the Park's tourist industry and local communities thrive.

3.5.9 Sustainable Transport

Transport is one of the negative environmental impacts of the National Park. Not only the resident population of the Park's mode of transport, getting around and managing the landscape, but also those of businesses and visitors.

At the time of the 2001 census, 16.83% of households did not own a car or van, compared to a Welsh average of 25.95%³³. Data from the BBNPA's visitor survey showed that 84.3% of respondents used a car, and they stated it was the main mode of transport used by visitors to access the Park. Between 2003 and 2004, the number of days spent by tourist cars on the Park's roads increase overall by 4%. During the summer months, vehicle activity peaked to 130,000 vehicle days in 2004.

There are a number of bus services, but the Park is generally not very well served, especially in the evenings, Sundays and bank holidays. There are no railway stations within the Park, but there are stations at the Park's boundaries. The potential of railways to bring visitors to the Park is not being fully realised, however there are poor linkages to the Park from the train stations due to poor bus services and cycleways.

³¹ 2001 Census as quoted in BBNP Local Plan 1999

³² BBNPA

³³ Census of population data profile

Within the Park there are nearly 2,000km of public rights of way. Of these, 62% are classified as being 'easy to use', a percentage which is higher than in some areas but still in need of improvement. The Rights of Way Improvement Plan provides a framework for improving ease of use as well as for improving the network.

3.6 Evolution of the baseline without the plan

The SEA regulations require that information is provided on "...the relevant aspects of the current state of the environment and the *likely evolution thereof without implementation of the plan*". It is recognised that the future baseline or the 'business as usual' scenario is difficult to describe, as trend data is often not available. However, this section will attempt to describe the future baseline for each SA/SEA topic.

In forecasting the 'business as usual' scenario it is necessary to determine what this means and what assumptions the scenario has been based on. Within this SA the business as usual scenario has been taken to mean a continuation of the current Unitary Development Plan.

Table 3-3: Evolution of the baseline without the plan

SA/SEA Topic	Evolution of baseline without the plan
Climate change	Temperatures are likely to rise, with summer heat waves becoming more common. Summer rainfall is predicted to decrease in the Park. Flood risk is likely to increase in the future even if no further development took place in the Park, due to the effects of climate change. Increased rain in winter and stronger storm events will increase fluvial flooding. It will also increase run-off and may cause increased erosion, loss/change to habitats and water quality problems.
Greenhouse gas emissions	Greenhouse gas emissions are likely to continue to decrease, although it is unlikely that they will reduce significantly. The amount of energy produced from renewable sources is likely to continue to increase.
Air quality	It is likely that those habitats currently at risk from acid rain and the fertilising effects on nitrogen will continue to be at risk. Increasing levels of visitor traffic in the Park could have an adverse effect on air quality.
Water quality	By 2015, 34% and 36% of surface water bodies within the Severn River Basin District and Western Wales River Basin District are expected to meet good or better overall status ³⁴ .
Water quantity	In 2013, the River Usk and the Bettws/Malpas Brook are both likely to be over licensed ³⁵ ; however there will be no water available in 2019 in the Bettws/Malpas Brook.

³⁴ River Basin Management Plans: Severn River Basin District and Western Wales River Basin District (2009)

³⁵ Note. The Usk Habitats Directive ROC process will determine the level of abstraction where 'no adverse effect' on the SAC can be concluded. This ROC is not yet available.

Soil and geodiversity	<p>Any contaminated land may be reduced as a result of national policy emphasis on use of brownfield land.</p> <p>Soil erosion may increase as a result of heavier rainfall in winter and increased flooding.</p> <p>Geodiversity has been neglected in the past (51% of geological SSSIs are in unfavourable condition) but has come to prominence with designation of the Fforest Fawr Geopark which could lead to an improvement in the condition of SSSIs.</p>
Biodiversity	<p>The current unfavourable status of a number of SACs and SPAs is likely to remain. While the favourable status of a number of areas is at risk as a result of issues including climate change and poor maintenance.</p> <p>55% of biological SSSIs are in unfavourable condition and of these 24% are still in decline. Therefore it is likely that a large proportion of biological SSSIs will remain in poor condition.</p> <p>The trend in the Park is for a continuing high rate of redevelopment, with a subsequent high risk to bat populations.</p> <p>Species and habitats along the River Usk (SSSI/SAC) are likely to be continued to be threatened by increasing abundance of aquatic invasive plant species, particularly Japanese knotweed. Himalayan balsam and Giant hogweed.</p>
Landscape and the built environment	<p>Loss of Tranquil Areas and increased levels of light pollution are likely to continue.</p>
Cultural heritage	<p>No trend data.</p>
Population and human health	<p>The Park's population is predicted to rise to 35,059 by 2016. This combined with a predicted fall in average household size, gives a predicted rise in the number of households of 2,040.</p> <p>There is likely to continue to be a growing number of older people within the Park.</p>
Housing	<p>No trend data.</p>
Economy	<p>The decrease in agricultural activity across the Park is expected to continue.</p> <p>Revenue from tourism is likely to continue to increase, particularly given the likelihood of warmer summers.</p>
Material Assets: Transport, Waste, Infrastructure	<p>Cars are likely to remain the most common form of transport used in the Park.</p>

4 Consultation

4.1 Background

Consultation is a mandatory requirement for SA/SEA and is required at more than one stage of the process. To date two consultation exercises have been undertaken.

4.2 Scoping Consultation

It is a legal requirement under the SEA Regulations for Wales to consult the designated consultation bodies; Countryside Council for Wales, the Environment Agency and Cadw, on the proposed scope of the SEA.

Consulting on the proposed scope of an SEA is commonly undertaken through the production of a 'Scoping Report'. Although not a mandatory requirement, Scoping Reports serve a useful function in SEA in bringing together vital information which can be used to facilitate consultation with stakeholders.

A Scoping Report was prepared for the emerging LDP, and was consulted on during September/October 2008. In addition to the designated Consultation Bodies (Environment Agency, Countryside Council for Wales (CCW) and Cadw), it is considered good practice to extend consultation on the proposed scope to other key stakeholders. To this end a wider range of organisations were contacted including amongst others community groups, health boards and environmental groups.

The following organisations responded to the Scoping Report:

- Environment Agency
- Countryside Council for Wales (CCW)
- Glamorgan Gwent Archaeological Trust Ltd
- Mid and West Wales Fire and Rescue Services & South Wales Fire and Rescue Services

Most responses provided useful additional baseline data or highlighted additional plans and programmes to be included in the review. All appropriate suggestions were adopted by the SA. Further detail on the scoping consultation, including a summary of the consultation responses and the actions taken in response, can be found in Appendix C of the Initial SA Report which can be accessed on the BB NPA Website.

4.3 Preferred Strategy Consultation

A second stage of consultation on the SA/SEA was undertaken alongside the consultation on the Preferred Strategy in January – February 2009. Similar to consultation at scoping it is a legal requirement under the SEA regulations for Wales to consult the designated Consultation Bodies. However, at this stage it is also necessary to consult other stakeholders and the public. To this end a wider range of organisations were contacted including amongst others community groups, health boards and environmental groups. A full list of organisations that were consulted on the Initial SA Report is provided Appendix C.

Consultation responses were received from the following four organisations:

- Countryside Council for Wales;
- Environment Agency Wales;
- Powys Local Health Board; and
- Welsh Assembly Government.

Many of the comments highlighted gaps in the baseline data or additional PPPs to be reviewed. A number of the consultees also provided comments in relation to the assessment methodology and monitoring. Appendix C provides further detail of the consultation responses received on the SA Report and the actions that taken forward in the SA process.

4.4 Deposit LDP Consultation

As a result of the consultation on the SA Report that accompanied the Deposit LDP, comments were received from the Countryside Council for Wales (CCW) and the Environment Agency Wales (EAW).

The details of the consultation comments and responses to those comments are provided in Appendix H.

5 Environmental and Sustainability Issues and SA/SEA Framework

5.1 Identifying Environmental and Sustainability Issues

The SEA Directive requires the identification of existing environmental issues which are relevant to the Plan. As the LDP relates to 'the conservation and enhancement of natural beauty, wildlife and cultural heritage' (the first purpose of designation) with regard to the entire Park, most environmental matters are relevant to it.

Sustainability appraisal is not such a prescribed process as SEA, and it normally relates to emerging strategies and policies within plans. However, as the SA and SEA are being carried out as one process for the LDP, it makes sense to include non-environmental (i.e., socio-economic) sustainability issues here as well.

The SEA Directive requires the identification of existing environmental and sustainability issues which are relevant to the LDP. These issues have been detailed in the SA/SEA Scoping Report. Table 5-1 sets out the environmental and sustainability issues which have been identified in the National Park area, through the following means:

- WAG and CCW guidance;
- Review of other policies, plans, and programmes;
- Analysis of the baseline information that is currently available for the Park;
- A workshop with key NPA staff;
- Informal and formal consultation with the Consultation Bodies; and
- Workshops with stakeholders.

Table 5-1: SA/SEA Topics and issues identified

SA/SEA Topic	Issues Identified
Climate change	Increase in the risk of flooding.
	Development in the floodplain
	Increase in the risk of drought.
	Increase in the risk of erosion, habitat loss and water quality.
Greenhouse gas emissions	Targets for Greenhouse gas emissions are not being met.
Air quality	Main outstanding issue is acid rain (nitrate deposition) originating outside the park.
	Potential issue with ozone levels
Water quality	The causes of some waters being biologically and chemically less than 'very good' needs to be addressed.
	A large majority of the NP falls within groundwater vulnerability zones.
	Issues with groundwater contamination from old mine works.
	Need to improve the water quality at the lower part of Monmouthshire Canal.

	Catchment management as the most cost-effective means of conserving water and improving water quality, versus expensive and intrusive water treatment works (new one at Talybont, new one sought in Upper Swansea Valley).
Water quantity	The effects of climate change on the abundance or limitations of water; River Usk is at or close to maximum abstraction capacity.
	Reservoirs run low or empty during prolonged drought.
Soil and geodiversity	Risk of soil erosion and reduction from grazing animals, walkers and other recreational activities.
	NP contains areas of peat and high carbon soils already degraded, compacted and eroded.
	51% of geological SSSIs in the park are in an unfavourable condition.
Biodiversity	Threats to biodiversity from habitat loss, pollution and the anticipated effects of climate and agricultural change.
	Of the 11 SACs in the NP, 9 have features that are in an unfavourable condition.
	55% of SSSI biological "features of importance" in the NP are in an unfavourable condition. Of those owned/managed by the NPA 77% are in an unfavourable condition.
	Continued risk to bat populations from built development; continued risk to other European Protected Species from declining hedgerow and coppiced woodland management (dormice), water levels and pollution (trout, salmon, twaite and allis shad, sea, river and brook lamprey, bullhead, white-clawed freshwater crayfish, otter, poorly planned development (great crested newts)
	Many of the LBAP habitats are currently declining.
	Knowledge gaps relating to the status and distribution of Species of Principal Importance to Wales and the status and condition of Habitats of Principal Importance to Wales (NERC list S42).
	Residual impacts of the natural gas pipeline travelling through the BBNP, which affects both the Rivers Usk and Wye SACs, numerous European Protected Species, 11 Affected Locations and farmland that has been poorly reinstated.
	Increasing abundance of riparian invasive plant species, particularly Japanese knotweed (also along roadsides) and Himalayan balsam, as well as Giant Hogweed, Cotoneaster (on limestone pavement and cliffs), potential increase by Rhododendron, grey squirrel.
	Increase in the risk of damage to flora and fauna from careless recreational use of wetlands.
	Pressure on the Park's biodiversity from the number of economic and social activities
Landscape, cultural heritage and the built environment	Lack of management of historic landscapes, scheduled ancient monuments and other archaeological features
	Effects of the natural gas pipeline on cultural heritage (3 Landscapes of Outstanding/Special Historic Interest), at least 1 historic park and garden and the NP landscape in general, as a consequence of the risk and possible likelihood of poor aftercare and final restoration.
	Adverse effects of changes in agricultural and rural development on the Park's landscape character and features.

	Increase in risk of quality and character of the built environment and cultural traditions.
	Loss of tranquillity within the Park.
	Noise/tranquillity issues in relation to MoD activities.
	Changes to the NP resulting in changes to agricultural practices. For example fewer people are exercising their grazing rights, and the anticipated decline in hill farming, thereby undermining the principal means of managing the Park's emblematic uplands and achieving essential improvements to this management.
Population and human health	Overall increase in population is expected via in-migration.
	Increase in the cost of housing in an area with already a high ratio of house price to income.
	The provision of affordable, low environmental impact and energy efficient housing for local people with fundamental services.
	Range of implications for the National Park from energy consumptions to planning maintenance of infrastructure to social services.
	Seasonal population fluctuations, impacting on communities, facilities and infrastructure.
	Compared to the rest of Wales health indicators for the NP (based on figures for Powys and Monmouthshire) are all above the national average (positive), with the exception of "Death from Road Traffic Accidents" which is significantly below (negative).
	Some of the rural areas within the Park suffer from poor access to local services.
Housing	A lack of land available for housing development within Brecon Town.
	Whilst the population of Brecon is projected to increase, the demand for housing is expected to increase at a faster rate. Factors contributing to this include the increase in buy-to-let investments, rising second home ownership and a reduction in the average number of people in each household.
	An identified shortfall in the level of affordable housing stock, primarily a result of a rising cost of land and an already limited number of available plots.
Economy	Employment figures are increasingly concentrated in limited industries.
	The agricultural industry employment figures are decreasing, which reduces the availability of skills and knowledge for land management of conservation.
Material Assets: Transport, Waste, Infrastructure	Lack of railway transport infrastructure and use of services is low.
	Increasing dependence on private vehicles as most of the Park is not well served.
	Need for improved rural transport.

5.2 Environmental and Sustainability Objectives

The purpose of the framework for the SA/SEA, set out in Table 5-2, is to provide a way in which the effects of the plan can be described, analysed, and compared. This process involves considering the content of the LDP against identified SA/SEA objectives.

The framework consists of the questions that need to be asked in order to assess the effects of the LDP on the environment and sustainability.

A more detailed framework which links the issues identified to the objectives and questions and which provides potential indicators to use in monitoring is presented in Appendix D. The indicators that are selected for monitoring will be finalised later in the SA/SEA process and agreed upon LDP adoption.

Table 5-2: The SEA/SA and framework objectives and questions

TOPIC: CLIMATIC FACTORS	
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
1. Ensure that adequate measures are in place to adapt to the impacts of climate change.	<ul style="list-style-type: none"> ...reduce - where practical - vulnerability to the effects of climate change? ...mitigate against flooding, or drainage problems? ...migrate development away from the floodplain where possible? ...have compliance with the objectives within the Water Framework Directive? ...encourage new development to be resilient to climate change? ...provide habitat corridors to allow species to adapt to the changing climate?
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
2. Mitigate effects on climate change by reducing greenhouse gas emissions in both existing and new development.	<ul style="list-style-type: none"> ...reduce greenhouse gas emissions? ...improve production and use of renewable energies? ...promote sequestration of carbon?³⁶ ...maintain existing carbon stores (e.g., organic soils and broad-leaved forests)? ...affect habitats, resulting in methane release? ...encourage use of locally sourced products?
TOPIC: AIR, WATER AND SOIL	
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
3. To maintain or improve air quality.	<ul style="list-style-type: none"> ...maintain or improve air quality? ...minimize emissions from residential and commercial sources? ...reduce emissions from transportation sources?
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
4. Maintain or improve water quality, and minimise the adverse effects of land use on water quality.	<ul style="list-style-type: none"> ...maintain or improve water quality, including groundwater quality?
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
5. Promote sustainable use of water resources and	<ul style="list-style-type: none"> ...restore and maintain water abstraction, run-off and recharge rates within the Park's carrying capacity (including future capacity)?

³⁶ Consideration of this approach is required as it is far from straightforward.

minimise adverse effects on water quantity.	...promote the sustainable use of water?
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
6. To protect and enhance soil quality (including non-chemical soil functions and processes such as permeability) and quantity, especially of carbon rich soils.	...reduce the loss or impoverishment of soils? ...reduce compaction and sealing of soils?
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
7. Conserve geodiversity and promote the understanding and enjoyment of geodiversity.	...conserve geological and geomorphological features? ...promote the enjoyment and understanding of geodiversity?
TOPIC: BIODIVERSITY	
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
8. To value, conserve and enhance the diversity of species, habitats and ecosystems.	...conserve and enhance the diversity of species? ...prevent the loss of LBAP target species and their habitats where possible? ...reduce the richness and abundance of non-native species? ...conserve and enhance the diversity of habitats? ...create and/or improve condition of LBAP target habitats? ...minimize disturbance to LBAP target habitats? ...have no adverse effect on SACs? ...conserve and enhance the integrity of ecosystems? ...prevent fragmentation of habitats? ...ensure development does not create barriers to species movement? ...promote ecological connectivity and habitat networks?
TOPIC: CULTURAL HERITAGE	
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
9. To understand, value, protect and manage historic landscapes, scheduled ancient monuments and other archaeological features appropriately.	...provide for the protection and management of historic landscapes, including the canal, scheduled ancient monuments and other archaeological features?
TOPIC: LANDSCAPE AND THE BUILT ENVIRONMENT	
SEA/SA	QUESTIONS: will the proposals in the plan...?

OBJECTIVES	
10. Maintain and enhance the quality of the built environment.	<p>...reduce the number of Listed Buildings at risk?</p> <p>...conserve the character of buildings and the street scene in Conservation Areas, as well as surroundings?</p> <p>...promote high quality design based on local character and distinctiveness?</p> <p>...promote a sense of place?</p>
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
11. Maintain and enhance the Park's landscape character and its associated features.	<p>...reduce or mitigate the adverse effects of agricultural change on the landscape?</p> <p>...ensure development is sited and designed with the landscape character in mind?</p> <p>...improve woodland management?</p> <p>...protect and enhance hedgerows and drystone walls?</p> <p>...reduce the visual impact of large developments that can be seen from the Park?</p> <p>...improve tranquillity or reduce light pollution?</p>
TOPIC: MATERIAL ASSETS	
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
12. Make sustainable use of natural resources and build and maintain environmentally friendly, high quality, services and infrastructure.	<p>...contribute to the reduction, reuse and recycling of waste?</p> <p>...contribute to appropriate waste treatment and disposal?</p> <p>...promote sustainable waste management? Reduce waste production and promote reuse and recycling?</p> <p>...minimise the use of finite resources and promote higher resource efficiency and the use of secondary and recycled materials?</p> <p>...promote the delivery of robust ICT infrastructure?</p> <p>...ensure adequate sewerage capacity is provided for new development?</p>
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
13. Increase sustainable transport opportunities.	<p>...promote sustainable modes of transport?</p> <p>...reduce the requirement for use of the private car?</p> <p>...promote a sustainable settlement strategy and appropriate location of services and facilities?</p> <p>...improve the integration of non-car transport modes and services?</p> <p>...promote the use of community transport?</p> <p>...improve accessibility to services, particularly for disadvantaged sections of society?</p> <p>...improve or extend the public rights of way network?</p>
TOPIC: POPULATION AND HUMAN HEALTH	
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
14. Maintain distinctive cultural identity and ensure the needs of the	<p>...provide sufficient housing for the needs of the local communities?</p> <p>...provide for and access to community services?</p> <p>...encourage healthy lifestyles?</p>

<p>changing demographics are reflected.</p>	<p>...ensure the population trends are considered in decision making processes, especially age? ...promote the retention of younger people? ...promote the design of settlements that improve social fabric by removing barriers and creating opportunities for positive interactions? ...improve safety and security for people and property. ...promote community interactions that will improve social cohesion? ...promote inclusion of disadvantaged and minority groups into society? ...ensure the quality of the built environment? ...reduce the burden of ill-health in the population? ...encourage walking or cycling as an alternative means of transportation? ...promote thriving safe and cohesive communities within and around the Park? ...promote and provide services to maintain healthy communities ...support the area's cultural traditions? ...support the Welsh language? ...encourage use of local products?</p>
<p>SEA/SA OBJECTIVES</p>	<p>QUESTIONS: will the proposals in the plan...?</p>
<p>15. Promote and improve accessibility to the Park and to its opportunities and facilities.</p>	<p>...improve access to the Park and to its opportunities and facilities for all? ...create new access opportunities where appropriate? ...ensure that the Park is easily accessible and promoted through eco-tourism? ...ensure that the tourism sector and attractions provide access by a choice of travel other than private means? ...improve the quantity and quality of publicly accessible open space? ...provide opportunities for people to come into contact with and appreciate the diversity of species, habitats, and ecosystems in the Park? ...remove barriers and create opportunities for people to live healthier lifestyles? ...reduce inequality and provide access to all facilities and services? ...encourage walking or cycling as an alternative means of transportation? ...reduce the causes of accidents? ...encourage integration of health issues into planning activities?</p>
<p>TOPIC: EDUCATION AND SKILLS</p>	
<p>SEA/SA OBJECTIVES</p>	<p>QUESTIONS: will the proposals in the plan...?</p>
<p>16. Increase opportunities to build an education and skills base.</p>	<p>...promote providing the best start in life for children? ...promote appropriate education provision for supporting 16-19 year olds? ...promote enrolment in further and higher education institutions? ...increase levels of literacy (in English and Welsh) and</p>

	numeracy? ...promote lifelong learning? ...promote the retention of skills in the Park? ...provide accessible educational and training facilities which meet the future needs of the area? ...promote education in rural skills?
TOPIC: ACHIEVING A SUSTAINABLE ECONOMY	
SEA/SA OBJECTIVES	QUESTIONS: will the proposals in the plan...?
17. Promote a thriving, locally-based economy.	...promote a sustainable agricultural economy in the Park? ...support a thriving, locally-based economy in the Park? ...support a flourishing and sustainable tourism industry in the Park? ...encourage use of local products and services? ...help provide good quality employment opportunities for all sections of the population? ...promote sustainable businesses in the Park? ...promote home working?

5.3 Compatibility of SA/SEA Objectives

A compatibility assessment of the SA/SEA objectives has been undertaken in order to identify whether there is incompatibility or tensions between certain objectives (Table 5-4). Where incompatibilities are identified it will be necessary to take these in to account when undertaking the assessment process and consider appropriate mitigation measures or alternative approaches in the LDP.

Table 5-3: Key to Compatibility Assessment

C	Objectives are compatible
?	Uncertainty over compatibility
N	Objectives not compatible
-	No relationship between objectives

Several uncertainties were identified and these are discussed below:

- The objectives to '*maintain and enhance the quality of the built environment*' and '*to maintain and enhance the Park's landscape character*' have an uncertain compatibility with the SA objective '*reduce greenhouse gas emissions*'. Uncertainty remains as renewable energy technologies such as wind turbines could have a negative effect on the built environment or landscape depending on their type, scale and location.
- There remains uncertainty between the SA objectives to '*maintain cultural diversity and allow for the changing demographic*' and '*promote a thriving, locally based economy*' on the following SA objectives: *reduce greenhouse gas emissions, maintain or improve water quality, sustainable use of water resources, protect and enhance soil quality and quantity, conserve geodiversity, value, conserve and enhance biodiversity, appropriate*

management of historic landscapes, maintain and enhance the Park's landscape character and make sustainable use of natural resources'. These objectives could be incompatible as they allow for both housing and employment growth. However, the assessment is considered to be uncertain as any effect will depend on the type, scale and location of future housing and employment growth.

- There is an uncertain compatibility between the objectives '*promote and improve accessibility to the Park and facilities*' and to '*value, conserve and enhance biodiversity*', '*appropriate management of historic landscapes*' and '*maintain and enhance the Park's landscape character*'. This is because improving accessibility to the Park could increase visitor numbers thereby adversely affecting these environmental assets.

Table 5-4: Compatibility of SA/SEA Objectives

Abridged Titles.	1. Climate change adaptation measures	2. Reduce GHG emissions	3. Maintain or improve air quality.	4. Maintain or improve water quality.	5. Sustainable use of water resources.	6. Protect and enhance soil quality and quantity.	7. Conserve geodiversity.	8. Value, conserve & enhance biodiversity.	9. Appropriate management of historic landscapes.	10. Maintain and enhance the quality of the built environment.	11. Maintain and enhance the Park's landscape character.	12. Make sustainable use of natural resources.	13. Increase sustainable transport opportunities.	14. Maintain cultural diversity and allow for the changing demographic.	15. Promote and improve accessibility to the Park + facilities.	16. Increase opportunities to build an education and skills base.	17. Promote a thriving, locally based economy.
1. Climate change adaptation measures.																	
2. Reduce GHG emissions.	C																
3. Maintain or improve air quality.	C	C															
4. Maintain or improve water quality.	C	-	-														
5. Sustainable use of water resources.	C	-	-	C													
6. Protect and enhance soil quality and quantity.	-	-	-	C	-												
7. Conserve geodiversity.	C	C	-	-	-	C											
8. Value, conserve & enhance biodiversity.	C	C	C	C	C	C	C										
9. Appropriate Management of historical landscapes.	-	-	-	-	-	-	-	C									
10. Maintain and enhance the quality of the built environment.	C	?	-	-	C	-	-	-	C								
11. Maintain and enhance the Park's landscape character.	-	?	-	-	-	-	-	-	-	C							
12. Make sustainable use of natural resources.	C	C	C	C	C	C	C	C	C	C	C						
13. Increase sustainable transport opportunities.	C	C	C	-	-	-	-	-	-	-	-	C					
14. Maintain cultural diversity and allow for the changing demographic.	C	?	?	?	?	?	?	?	?	C	?	?	C				
15. Promote and improve accessibility to the Park + facilities.	-	-	-	-	-	-	-	?	?	-	?	C	C	C			
16. Increase opportunities to build an education and skills base.	-	-	-	-	-	-	-	-	-	-	-	C	-	C	C		
17. Promote a thriving, locally based economy.	-	?	?	?	?	?	?	?	?	-	?	?	-	C	-	C	

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5.3.1 Inter-relationships between SA/SEA objectives

During the SA/SEA assessment the SA/SEA objectives should not be considered in isolation as many inter-relationships exist that need to be taken into account. Some of these relationships are clear cut and easy to understand, for example reduced greenhouse gas emissions and improved air quality which would both result from transport modal shift to sustainable travel modes. Others however can be less obvious, but are equally important and need to be understood when assessing the LDP. For example there are inter-relationships between climate change adaptation measures and improvement in human health, from improved safety associated with reducing the risk of properties flooding, through to reduced levels of stress and improved well-being resulting from improvements to energy efficiencies of homes.

Close inter-relationships exist between environmental topics such as air quality, water quality, soil and biodiversity, with improvements or degradation to one often resulting in a similar effect on the other related media/topics. For example increased air pollution can have adverse effects on soil, water quality, and biodiversity through acidification. These effects can then cause issues relating to landscape degradation.

5.4 Compatibility of SA/SEA Objectives with LDP Objectives

A compatibility assessment of SA/SEA objectives with the LDP objectives has been undertaken and is summarised in Table 5-5. As with the internal compatibility of the SA/SEA objectives (above), where incompatibilities are identified these have been taken into account when considering appropriate mitigation measures or alternative approaches in the LDP.

Most of the objectives were identified as either being compatible or having no relationship with each other. The compatibility assessment identified one incompatibility, between the LDP objective *'no new mineral workings or extensions to existing mineral workings will be permitted in the National Park except in exceptional circumstances'* and the SA/SEA objective *'to promote a thriving, locally based economy'*. The incompatibility has been identified as restricting minerals extraction in the Park could have a negative effect on the local minerals industry.

A number of uncertainties were identified in the compatibility assessments.

5.4.1 National Park Purposes; Special Qualities & Potential for Growth

The compatibility of the LDP objectives and the SA objectives has identified some uncertainties which are listed below.

- The LDP objective to *'encourage development on previously developed land in preference to the development of Greenfield land'* could be incompatible with the SA objectives on geodiversity, biodiversity and historic features but this is dependent on the features present at the individual sites. For example some brownfield sites can have a high biodiversity value.
- The compatibility between the LDP objective to *'conserve and enhance the rich and complex biodiversity of the Park'* and the SA objective to

'promote and improve accessibility to the Park and facilities' is uncertain. Habitat connectivity between urban and greens spaces may be damaged if new roads are constructed or existing road are extended to improve the accessibility to the Park. This could result in fragmentation of habitats. From the opposite standpoint, conservation biodiversity may result in access restrictions being introduced which could restrict accessibility to certain areas of the Park.

- There is uncertainty between the LDP objective *'to ensure adequate provision of utilities for local communities and future developments'* and the SA biodiversity objective. This is because there is the potential for biodiversity to be compromised when utilities are installed or upgraded. Compatibility between this LDP objective and the SA objective on water quality is also uncertain, as installation of new sewerage infrastructure may help to alleviate local water quality issues if they exist.
- *The compatibility between the LDP objective 'To protect the National Park against new mineral workings and extensions to existing mineral workings, whilst also safeguarding appropriate mineral resources from sterilisation.'* with the SA objective on geodiversity is uncertain as refusing permission for new or extended minerals working may limit the number of new geodiversity sites that emerge.

5.4.2 Sustainability and Climate Change

The compatibility of the LDP objectives and the SA objectives has identified some uncertainties which are listed below.

- The compatibility of the LDP objective to *'encourage developments to make use of renewable energy resources and to encourage small to medium scale community led renewable projects'* with the SA objectives on biodiversity, historic landscape, built environment and landscape is uncertain as future renewable energy developments such as wind turbines or micro-generation equipment could have adverse visual effects, whilst any small hydro-electric schemes may adversely affect biodiversity. The effects are uncertain as they are dependent on the scale and location of the schemes.

5.4.3 Foster the social and economic well-being of local

The compatibility of the LDP objectives and the SA objectives has identified some uncertainties which are listed below.

The compatibility of the LDP objective *'to support a sustainable tourism industry which contributes to the public's enjoyment of the National Park'* with the SA objective on biodiversity is uncertain. Although the LDP supports sustainable tourism, this could still have a negative effect on biodiversity, particularly through disturbance. For example, increasing footfall on the hills could affect upland species.

Table 5-5: Compatibility Assessment of SA/SEA Objectives and LDP Objectives

LDP Objectives	SA Objectives																
	1. Climate change adaptation measures.	2. Reduce GHG emissions.	3. Maintain or improve air quality.	4. Maintain/improve water quality.	5. Sustainable use of water resources.	6. Protect and enhance soil quality and quantity.	7. Conserve geodiversity.	8. Value, conserve & enhance biodiversity.	9. Appropriate management of historic landscapes/features.	10. Maintain and enhance the quality of the built environment.	11. Maintain and enhance the Park's landscape character.	12. Make sustainable use of natural resources.	13. Increase sustainable transport opportunities.	14. Maintain cultural diversity and allow for changing demographic.	15. Promote and improve accessibility to the Park + facilities.	16. Increase opportunities to build an education and skills base.	17. Promote a thriving, locally based economy.
National Park Purposes: & Potential for Growth	To conserve and enhance the special qualities of the Brecon Beacons National Park.	-	-	-	-	-	-	C	C	C	C	C	-	-	-	-	-
	Encourage development in sustainable locations near facilities and services therefore minimising the need to travel, whilst also respecting the National Park purposes and special qualities.	-	C	C	-	-	-	-	-	-	-	C	-	C	-	-	-
	Encourage development on previously developed land in preference to the development of Greenfield land.	-	-	-	-	-	C	?	?	?	-	C	C	-	-	-	-
	To ensure that all future development will protect and enhance the beautiful and varied character of the Landscape.	-	-	-	-	-	-	-	-	C	C	C	-	-	-	-	-
	To ensure that all development affecting the historic environment enhances the historic landscape and traditions of the built environment whilst also taking appropriate account of the requirements for sustainable design.	-	-	-	-	-	-	-	-	C	C	C	-	-	C	-	C
	Conserve and enhance the cultural heritage of the Park's communities including use of the Welsh language.	-	-	-	-	-	-	-	-	C	-	-	-	-	C	-	-
	Conserve and enhance the rich and complex biodiversity of the Park .	-	-	-	-	-	-	-	C	-	-	C	-	-	-	?	-
	Protect and enhance the geological resources of the Park, including the European Geopark.	-	-	-	-	-	-	C	-	C	-	C	-	-	-	-	-
	To ensure adequate provision of utilities for local communities and future developments.	-	-	-	?	-	-	-	?	-	-	-	-	-	C	-	-
	To ensure that air, water and soil resources will be used in a sustainable manner in all new development, and that standards for soil and air quality are maintained at a high level.	-	-	C	C	C	C	-	C	-	-	-	C	-	-	-	-
National Park Purposes: Special Qualities	To ensure people and organisations reduce, reuse and recycle waste whilst also encouraging local waste and recycling facilities. To resist regional waste facilities in accordance with the Regional Waste Plan.	-	C	-	-	-	-	-	-	-	-	C	-	-	-	-	C
	To protect the National Park against new mineral workings and extensions to existing mineral workings, whilst also safeguarding appropriate mineral resources from stensilisation.	-	-	-	-	-	-	?	C	C	-	C	C	-	-	-	N
	To ensure that the National Park is resilient and responsive to drivers of change and proactive in limiting and mitigating the effects of climate change.	C	C	-	-	-	C	-	-	-	-	-	C	-	-	-	-
	Encourage developments to make use of renewable energy resources and to encourage small to medium scale community led renewable energy projects.	-	C	-	-	-	-	-	?	?	?	?	C	-	-	-	-
	Improve the physical quality, energy efficiency, accessibility and sustainable design and construction of all development throughout the Park; Promote a sustainable settlement pattern which enhances the special qualities of the National Park.	C	C	-	-	C	-	-	-	-	C	-	C	C	-	C	-
	To ensure the location of development does not result in unacceptable flood risk.	C	-	-	-	-	-	-	-	-	-	-	-	-	C	-	-
	Provide for the overall housing requirements through a mix of dwelling types, catering for identified needs and which promotes integrated and thriving communities.	-	-	-	-	-	-	-	-	-	C	-	-	-	C	-	C
	To ensure that good quality, affordable housing of all types will be accessible to the Park's communities where there is an identified need.	-	-	-	-	-	-	-	-	-	C	-	-	-	C	-	C
	Provide for a sustainable economy with strong links between local employment opportunities and housing supply.	-	-	-	-	-	-	-	-	-	-	-	-	-	C	-	C
	To promote development which is supported by sustainable transport initiatives and reduce the reliance on private motor vehicles.	-	C	C	-	-	-	-	-	-	-	-	C	C	-	C	-
Foster the social and economic well-being of local communities	To support a sustainable tourism industry that contributes to the public's enjoyment of the National Park.	-	-	-	-	-	-	?	C	-	C	-	C	C	C	-	C
	To maintain and enhance the vitality and viability of the town centres in the National Park through the identification of prime retail cores.	-	-	-	-	-	-	-	-	C	-	-	-	C	C	-	C
	Promote integrated communities with sustainable access to a wide range of facilities and services.	-	C	C	-	-	-	-	-	-	-	-	C	C	C	C	C
	Enable development that encourages a healthy lifestyle and promotes wellbeing.	-	C	C	-	-	-	-	-	-	-	-	C	C	C	-	-

6 Initial Assessment of Strategic Alternatives

6.1 Introduction

An initial assessment of the emerging Strategic Development Options which were being considered by the NPA during the development of the LDP was undertaken. The four Strategic Development Options were considered during the preparation of the LDP were:

1. *The National Park Conservation Strategy/ Containment Strategy*

Low level of growth: approx. 1,200 houses. No expansion of existing urban areas. Development only where there is access to service and facilities;

2. *Community Vitality Strategy*

Moderate level of growth: 1,500 - 1,650 households. Predict and provide approach. Dispersal of growth throughout communities in the Park. Development within settlements with a demonstrable need. Potential for Greenfield sites for locally derived need;

3. *Sustainability and Climate Change Strategy*

Moderate level of growth: 1,500 - 1,650 households. Locate development in key settlements, near facilities and services. Avoid areas of flood risk. Limited growth outside key settlements; and

4. *Market-led Growth Strategy*

Moderate to high level growth: including significant commercial opportunities. Large scale growth along A40 particularly in the east of the Park. Increased commercial opportunities in the key settlements. Significant growth in Brecon and Talgarth.

6.2 Assessment Approach

Each of the four Strategic Development Options was assessed against the 17 Sustainability Appraisal (SA) objectives included in the SA Objectives Framework³⁷.

The results of the assessments are summarised using the following key (Figure 6-1).

³⁷ The SA Objectives Framework was sent out for consultation in September 2008. Consultation comments were still being received and the framework was therefore not finalised at the time of undertaking this assessment.

Figure 6-1: Assessment Criteria

Significance Assessment	Description
++	Option would have a major positive effect on sustainability in its current form as it would resolve an existing issue or maximise opportunities. SIGNIFICANT
+	Option would have a minor positive effect on sustainability.
?	Effect of option on sustainability is uncertain.
0	Option would have a neutral effect on sustainability.
-	Option would have a minor adverse effect on sustainability.
--	The option would have a major adverse effect on sustainability as it would substantially exacerbate existing problems. Consider exclusion of option. SIGNIFICANT

6.3 Assessment Results

Figure 6-2 provides a summary of the assessment of each option against the SA objectives. The following text outlines the sustainability conclusions for each option. The full results of the assessment are provided in Appendix E.

SA/SEA Objective	Climate change adaptation	Greenhouse gas reduction	To maintain or improve air quality.	Water quality	Water quantity and flood risk.	Soil quality and quantity	Conserve geodiversity	Conserve and enhance biodiversity	Historic landscapes, monuments & archaeology	High quality services and infrastructure.	Landscape character and its associated features.	Make sustainable use of natural resources.	Increase sustainable transport opportunities.	Population and health	Promote and improve accessibility to the Park	Build an education and skills base.	Promote a thriving, locally-based economy
Option 1: Containment Strategy	0	+	0	?	-	0	0	?	?	-	0	0	+	?	0	0	?
Option 2: Community Vitality Strategy	0	-	?	?	-	?	0	?	?	?	?	-	-	?	+	0	+
Option 3: Sustainability & Climate Change Strategy	+	+	0	?	?	?	0	?	?	?	?	-	+	?	0	0	+
Option 4: Market-led Growth Strategy	-	?	?	?	-	?	0	?	?	?	?	-	+	?	0	0	+

Figure 6-2: Summary of Strategic Development Option Assessment

Option 1: The National Park Conservation Strategy/ Containment Strategy

This option will limit some of the environmental impacts but the low levels of growth could restrict opportunities for enhancements to community viability and vitality outside the main settlements.

This option restricts ability to address current vulnerability to extreme weather events. It therefore will not allow risks to be reduced in a holistic manner. The strategy will limit ability to meet emissions reduction targets that are being set nationally.

Option 2: Community Vitality Strategy

The dispersed nature of the growth, even in moderate levels, under this option will increase environmental impacts across the whole Park. However provision of local needs will help to maintain community viability and vitality outside the main settlements.

This option limits the ability to significantly reduce greenhouse gas emissions through the use of community heat & power schemes and through increased car usage. It will not increase the ability to manage flood risk, in particular the reduction of existing vulnerability.

Option 3: Sustainability and Climate Change Strategy

The concentrated nature of development under this option should limit environmental impacts across the Park, however the moderate levels of growth may increase impacts compared to Option 1. Allowing some growth outside the main settlements will allow for provision of essential needs in smaller settlements, although not at the same level as Option 2.

This option will help to enable the wider viability of community heat and power schemes, tapping into existing buildings, and a greater mix of building uses – e.g. domestic, commercial, hotels etc. which will help to increase efficiency of energy use thereby helping to reduce per capita greenhouse gas emissions.

Where development is located at locations at reduced flood risk – then site specific plans would be required to ensure that the development itself did not exacerbate the flood risk lower down the valley. Approach should help to reduce the percentage of dwellings vulnerable to extreme weather events.

May have a minor economic benefit in enhancing local SD construction and renewable energy skills and supply chains

Option 4: Market-led Growth Strategy

The higher levels of growth under this option are likely to result in increased impacts on the environment. However increased housing and employment opportunities would provide social benefits.

Areas of demonstrated demand may be in areas that are particularly vulnerable to climate change across any of a broad range on elements – flooding, water resources, vulnerable soils, migration corridors etc. The market is unlikely at present to take account of this. This is likely to result in long term vulnerability being increased.

One of the topic based implications refers to the likely low level of affordable housing growth under this option. However this could be managed by the introduction of a specific local condition requiring a proportion of these as Affordable Housing.

6.4 The Preferred Strategy

In addition to the assessment undertaken for the SA/SEA the NPA undertook further assessment and evidence gathering in order to decide on a preferred strategy. The evidence collected showed that the preferred strategy needed to balance the need to mitigate the effects of climate change and environmental impact against the need to provide opportunities for key social and economic growth whilst maintaining localised community vitality. Clearly, no one single

option considered above would have been able to achieve this. The NPA therefore developed a hybrid strategy to bring forward the most beneficial outcomes from the four options. The hybrid strategy would:

- Have sustainability and climate change at its heart;
- Enable economic growth and opportunities for regeneration in the strategic settlements identified in the Wales Spatial Plan; and
- Be responsive to communities' aspirations for some growth outside key settlements, particularly in those communities in the west of the Park.

7 Assessment of the Preferred Strategy

7.1 Introduction

The evidence collected during the consideration of strategic alternatives showed that the Preferred Strategy should balance the need to mitigate the effects of climate change and environmental impact against the need to provide opportunities for key social and economic growth whilst maintaining localised community vitality. No one single option considered at that stage would have been able to achieve this and the NPA therefore developed a hybrid strategy to bring forward the most beneficial outcomes from the four options. The hybrid strategy was developed to:

- Have sustainability and climate change at its heart;
- Enable economic growth and opportunities for regeneration in the strategic settlements identified in the Wales Spatial Plan; and
- Be responsive to communities' aspirations for some growth outside key settlements, particularly in those communities in the west of the Park.

To support the delivery of the Preferred Strategy a series of Strategic Policies were developed. In addition, one Strategic Development Site was included in the Preferred Strategy document.

The Preferred Strategy and supporting policies were assessed against the SA/SEA objectives and presented in an Initial SA Report which was published for consultation alongside the Preferred Strategy in December 2008. The results of that assessment are summarised below.

7.2 Assessment Summary

Similar to the assessment undertaken on the alternative strategies, each of the plan elements (i.e. vision, objectives, preferred strategy, policies etc.) was assessed against the framework of objectives. This second round of assessment went into greater detail than the previous assessment, looking at how effects may vary over time and location as well as whether cumulative effects may result. A summary of the assessment can be found in Figure 7-1.

None of the components within the Preferred Strategy were identified as likely to have a significant adverse effect on the sustainability objectives. Significant positive effects were identified for the following components:

- **The Preferred Strategy** - Aiming to ensure that all development in the Park is able to adapt to the likely effects of climate change beyond the plan period, should have a significant positive effect on climate change adaptation. The strategy will ensure that all development takes account of future risks of flooding, is intelligently sited, climate responsive, built with sustainable materials, resource efficient and accessible to all for the lifetime of the development.
- **Strategic Policy 3 Environmental Protection** – As this policy aims to protect and enhance across a range of environmental and social assets it has been forecast to have significant positive effects against seven SA/SEA objectives: water quality, geodiversity, biodiversity, cultural heritage, built environment and landscape.

- **Strategic Policy 4 Climate Change** – The policy aims to ensure that development within the Park is resilient and adaptable to the likely effects of climate change thereby helping to ensure that adequate measures are in place to adapt to the impacts of climate change adaptation. Also the policy requires proposals to demonstrate how the development will minimise greenhouse gas emissions and limit and mitigate the likely effects of climate change is likely to reduce greenhouse gas emissions from new developments.
- **Strategic Policy 11 Sustainable Development** - The policy requires all development to be constructed in line with the Sustainable Design Guide. Key principles within this guide are to design for climate change, for example by ensuring that building fabric is designed to cope with hotter, wetter and windier conditions, and to minimise greenhouse gas emissions.
- **Brecon Strategic Employment Site** - Development of the site for employment uses will contribute towards regeneration of Brecon and will provide jobs for the local community and hinterlands thereby having a significant positive effect on the economy.

Minor positive or minor adverse effects have been forecast for some of the 'Preferred Strategy' components against other SA objectives. In particular, adverse effects have been forecast for a number of the SA objectives (including soil) as a result of the components which will allow for housing and employment development. However other components within the 'Preferred Strategy' should help to mitigate these effects.

Some uncertainty over the effects of the proposed housing and employment development on a number of the objectives (including biodiversity, landscape and cultural heritage) were identified. This was because the effect of the development would be dependent on its final scale and location.

LDP Component		SA/SEA Objective Topic																
		Climate Adaptation	GHG Reduction	Air Quality	Water Quality	Water Quantity	Soil	Geodiversity	Biodiversity	Cultural Heritage	Built Environment	Landscape	Material Assets	Transport	Population	Accessibility	Education/Skills	Economy
Preferred Strategy		++	+	?	?	-	-	0	?	?	?	?	-	+	+	0	?	+
Strategic Policies	SP1 National Park Policy	0	0	0	+	+	+	+	+	+	+	0	0	+	+	0	+	
	SP2 Major Devt in the National Park	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	
	SP3 Environmental Protection	+	0	+	++	+	+	++	++	++	++	0	0	+	++	0	+	
	SP4 Climate Change	++	++	+	0	+	+	0	+	0	0	0	?	?	+	0	0	0
	SP5 Housing	0	-	-	0	-	-	0	?	?	?	?	-	0	?	0	0	0
	SP6 Affordable Housing	0	0	0	0	0	-	0	-	?	0	?	0	?	+	0	0	0
	SP7 Waste	0	0	0	+	0	0	0	0	0	0	0	+	0	0	0	0	+
	SP8 Minerals	0	0	0	0	0	+	?	+	+	0	+	+	0	+	0	0	-
	SP9 Renewable Energy	0	+	0	?	?	0	0	0	-	-	-	0	0	?	0	+	+
	SP10 Sustainable Distribution of Development	+	+	+	?	?	-	0	?	?	?	?	?	+	+	0	+	+
	SP11 Sustainable Development	++	++	0	+	+	+	+	+	+	+	+	+	?	+	0	+	+
Brecon Strategic Employment Site		0	?	?	0	0	-	0	?	0	0	?	0	+	+	0	+	++

Figure 7-1: Summary of Preferred Strategy Assessment

8 Assessment of Deposit LDP

8.1 Methodology of the Assessment

The assessment of the Deposit LDP explored the likely effects of the strategy, policies and candidate sites against 17 Sustainability Appraisal (SA) objectives which are included in the SA Objectives Framework developed as part of the LDP SA/SEA Scoping Report and updated following consultation on that report. The assessment considered the sustainability effects of implementing the LDP when compared to the 'business as usual' scenario of continuing with the current Unitary Development Plan (UDP) (see Section 3.6).

The same scoring criteria as used for both of the previous assessment stages was utilised (Figure 6-1). Where relevant effects have been forecast in terms of:

- Permanence (permanent or temporary);
- Scale (local (within the NP), regional (affecting local neighbouring authorities), national/international (affecting Wales/UK or a wider global impact)); and
- Timescale (in the short term (1-5 years), medium term (5-10 years) or long term (10+ years)).

The assessment has also identified cumulative/synergistic effects, cross-boundary effects and interrelationships between the SA objectives.

In order to streamline the assessment and reporting process the policies were grouped under the appropriate strategic policy and assessed in combination. This helped to avoid the unnecessary duplication of assessments.

For the assessment of the site allocations the assessment needs to take account of the greater level of locational specificity made available by inclusion of the detailed sites and their proposed uses. In order to facilitate this process an additional series of site specific questions have been added to the SA objective framework. Detail of these can be found in the Site Assessment Appendix G.

Where conflicts were identified, possible measures to offset adverse effects were considered, with recommendations provided. The majority of the recommendations have been as part of the on-going plan making process and have been adopted through continuous improvement of the policies.

8.2 Spatial Strategy and Site Allocation Assessment

In undertaking the Sustainability Appraisal of the spatial strategy and the site allocations to deliver this strategy an approach has been taken that aims to simplify the process and also avoid unnecessary duplication of assessments.

Certain sustainability issues can be appropriately covered at the strategic level whilst others need more detailed settlement and in some cases site level information to inform the assessment process. A cascaded approach to the assessment has therefore been adopted and this is summarised in Figure 8-1.

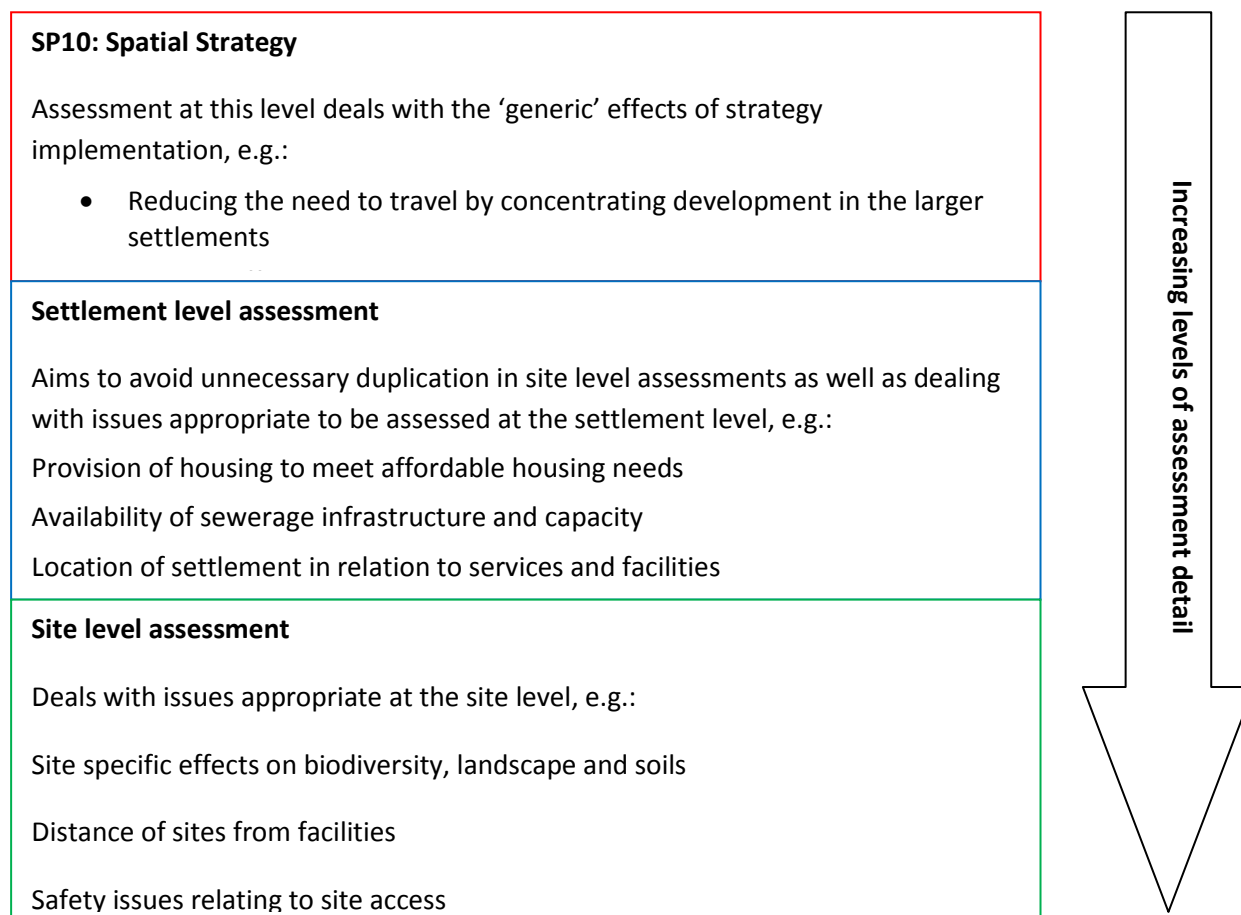


Figure 8-1: Tiered Approach to Assessment

The assessments have been informed by the comprehensive site selection process that has been undertaken by BBNPA officers, in particular the detailed ‘Part 3’ assessments that have been carried out for all sites that passed through the ‘Part 2’ screening process.

8.3 Summary of the Assessment

The assessment of the Deposit LDP has found that generally the policies are likely to have positive Park-wide effects across the range of sustainability topics. The assessment has indicated that the Deposit Policies provide strong progression of core SA objectives, in particular those for climate change adaptation/mitigation through location and design of new development, and for population through the support for necessary regeneration within certain settlements, the provision of affordable housing to meet identified needs within the Park, and policies that enable appropriate levels of development within the smaller Park communities in order that they can maintain vitality and viability. The protection of the Park’s special qualities and the environment in general are built-in at multiple levels within the LDP.

Where adverse effects have been identified against particular policies or site allocations several of the strategic and detailed policies will help to minimise the potential adverse effects that have been identified.

Figure 8-2 provides a summary of the assessment of the Strategic Policies against the SA/SEA objectives. The following sections provide summaries of the findings of the SA assessments for the different levels and elements of the

Deposit LDP. Full assessments and more detail on the methodologies utilised can be found in the detailed Appendices F and G.

Cumulative, synergistic and secondary effects were also assessed and are discussed in Section 8.7. Cross boundary effects are discussed in Section 8.8.

Policy area	SA Objective																		
	CC Adaptation	GHG Emissions	Air Quality	Water Quality	Water Resources	Soils	Geodiversity	Biodiversity	Cultural Heritage	Built Environment	Landscape	Natural Resources & Infrastructure	Sustainable Transport	Population	Access to Park & Facilities	Education & Skills	Economy		
Strategic SP10	+	+	+	?	-	-	0	?	?	?	?	?	+	++	0	+	+		
Brecon	+	+	0	+	+	-	0	-	+	0	+	+	?	+	+	+	0	+	
Crickhowell	+	+	0	+	+	-	0	-	+	0	+	+	?	+	+	+	0	+	
Talgarth	+	+	0	+	+	-	?	0	-	+	+	+	?	+	+	+	0	+	
Hay on Wye	+	+	0	+	+	-	0	-	+	+	+	?	+	+	+	+	0	+	
Level 3 settlement	0	+	0	+	+	-	0	-	+	0	+	+	?	+	+	+	0	0	+
Level 4 settlement	0	+	0	+	+	-	0	-	+	0	+	+	?	+	+	+	0	0	+
Edge of settlement	+	+	0	+	+	0	0	+	0	0	?	+	0	+	0	0	0	0	
Countryside	0	+	0	0	0	-	0	-	0	+	-	+	+	+	+	+	+	+	
NP Policy	0	0	0	+	+	+	+	++	++	+	++	0	0	++	+	0	++		
SP2 Major Devt	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	?	
SP3 Environmental Protection.	+	0	+	+	++	+	+	++	++	+	++	0	0	+	+	0	+		
SP 4 Climate Change	++	++	+	0	+	+	0	+	0	0	0	?	?	+	0	0	+		
SP11 Sustainable Design	++	++	0	+	+	0	+	+	+	+	+	++	?	+	0	+	+		
SP9 Renewables	0	+	0	?	?	0	0	?	?	?	?	0	0	?	0	+	+		
SP5 Housing	0	-	-	0	-	-	0	-	0	+	0	+	0	++	0	0	+		
SP6 Affordable H	0	+	0	0	0	-	0	-	-	0	-	?	0	++	0	0	+		
SP 12 Economy	0	+	0	0	0	0	0	0	0	+	+	0	0	++	0	+	++		
SP 13 Retail	0	+	0	0	0	0	0	0	0	+	0	0	0	+	+	0	++		
SP 14 Tourism	0	-	-	0	0	?	0	?	0	0	0	0	0	+	+	+	+		
SP15 Communities	0	+	0	0	0	0	0	0	0	0	0	0	0	++	0	+	0		
SP16 Infrastructure	+	0	0	+	+	?	?	+	+	+	+	++	+	+	0	0	0		
SP17 Transport	0	+	+	+	0	0	0	0	0	+	+	0	+	+	+	0	0		
SP18 Sustainable Use of Land	+	0	0	0	0	+	0	+	0	0	+	0	0	0	0	0	0		
SP7 Waste	0	+	?	+	0	?	0	0	0	0	+	++	0	+	?	0	0	+	
Minerals policies	0	+	+	+	0	+	?	+	+	0	+	++	0	+	0	0	-		

Figure 8-2: Summary of Assessment

8.4 Assessment of Spatial Strategy

8.4.1 SP10 Spatial Strategy

The Spatial Strategy provides a good balance between focusing development in the key settlements whilst allowing for demonstrated local needs to be met in smaller settlements and rural areas. The growth in key settlements will help to support certain regeneration needs in the towns and improve levels of community vitality, with associated social and economic benefits. It will also help to service the needs of surrounding areas. The strategy prevents the general dispersal of development across the wider Park countryside. Significant positive effects have been predicted in relation to the population objective.

Through the moderate levels of growth proposed there will inevitably be increases in levels of land and resource use as well as increased greenhouse gas emissions from increased activities. However by focusing growth in the key settlements, the wider effects on the special qualities of the National Park should be minimised and through concentration of growth the strategy should also reduce the need to travel, particularly by private car. Also, several of the strategic and detailed policies and that support the Spatial Strategy will help to minimise the potential adverse effects that have been identified.

8.4.2 Brecon

- Policy BL LP1: Enabling Appropriate Development
- Policy BL LP2: Mitigating Impact

Whilst the use of predominantly greenfield sites and exceptional use of edge of settlement sites to deliver the desired level of development could result in some adverse effects on soils, biodiversity and potentially local landscapes, the policies generally perform well against the majority of the other SA objectives. The provision of housing, employment, retail and community facilities in the Principle Settlement within the Park will help to meet the needs of both the local population and the wider Park community and help to tackle specific issues of deprivation within certain areas of Brecon.

Concentrating development within Brecon will help to reduce the need to travel to access services and jobs and will also help to protect the rural areas of the Park which will be subject to lower levels of growth. Enabling development that can strengthen and enhance the social and cultural status of the town could have wide ranging effects on the general vitality of the town and surrounding area.

8.4.3 Crickhowell

- Policy CR LP1: Enabling Appropriate Development.
- Policy CR LP2: Mitigating Impact

Whilst the use of greenfield sites and exceptional use of edge of settlement sites to deliver the desired level of development could result in some adverse effects on soils, biodiversity and potentially local landscapes, the policies generally perform well against the majority of the other SA objectives.

The provision of housing, employment, retail and community facilities in this Key Settlement will help to meet the needs of both the local population and the

surrounding area and help to tackle the specific issue of a lack of affordable housing for local residents of Crickhowell. Enhancing the tourism offering of Crickhowell, particularly the night-time economy should increase the vitality of the town and encourage the provision of new jobs to the benefit of the local community.

8.4.4 Talgarth

- Policy T LP1: Enabling Appropriate Development.
- Policy T LP2: Mitigating Impact

Whilst the use of predominantly greenfield sites and exceptional use of edge of settlement sites to deliver the desired level of development could result in some adverse effects on soils, biodiversity and potentially local landscapes, the policies generally perform well against the majority of the other SA objectives.

The provision of housing, employment, retail and community facilities in this Key Settlement will help to meet the needs of both the local population and the surrounding area and help to enable the continuing regeneration of Talgarth and tackle the relatively high levels of deprivation that exist in some areas of the town. Enhancing the tourism offering of Talgarth should help increase the vitality of the town and encourage the provision of new jobs to the benefit of the local community.

8.4.5 Hay on Wye

- Policy HOW LP1: Enabling Appropriate Development.
- Policy HOW LP2: Mitigating Impact

Whilst the use of predominantly greenfield sites and exceptional use of edge of settlement sites to deliver the desired level of development could result in some adverse effects on soils, biodiversity and potentially local landscapes, the policies generally perform well against the majority of the other SA objectives.

The provision of housing, employment, retail and community facilities in this Key Settlement will help to meet the needs of both the local population and the surrounding area and help to address some of the issues relating to higher than average house prices and a high level of 2nd home ownership. Enhancing the tourism offering of Hay on Wye which will help to strengthen the vitality of the town and its role as a "cultural capital" and encourage the provision of new jobs to the benefit of the local community.

8.4.6 Level 3 settlements

- Policy S LP1: Definition of Settlements
- Policy S LP2: Enabling Appropriate Development
- Policy S LP3: Mitigating Impact

Whilst the use of predominantly greenfield sites and exceptional use of edge of settlement sites to deliver the desired level of development could result in some adverse effects on soils and biodiversity and potentially local landscapes, the Level 3 settlement policies generally perform well against the majority of the SA objectives.

The policies allow for identified local needs to be met which should help to maintain community vitality and the viability of service provision as well as supporting local rural economies. The policies should also help reduce the need to travel to access local services as well as enabling access to everyday needs for those who do not have access to a private car. The policies also prevent the character of settlements from being adversely affected by an inappropriate scale of new development.

8.4.7 Level 4 settlements

- Policy LGS LP1: Limited Growth Settlements
- Policy LGS LP2: Enabling Appropriate Development
- Policy LGS LP3: Mitigating Impact

Whilst the use of predominantly greenfield sites and exceptional use of edge of settlement sites to deliver the desired level of development could result in some adverse effects on soils and biodiversity and potentially local landscapes, the Level 4 settlement policies generally perform well against the majority of the SA objectives.

The policies allow for an appropriate level and scale of development to meet identified local needs, including diversification of agriculture and provision of tourism facilities. This should help to maintain community vitality and the viability of local service provision as well as supporting local rural economies. The policies should also help reduce the need to travel to access local services as well as enabling access to everyday needs for those who do not have access to a private car. The policies also prevent the character of settlements from being adversely affected by an inappropriate scale of new development.

8.4.8 Edge of Settlement

- Policy E LP1: Community Sustainability Edge of Settlement Locations

By enabling the edge of settlement provision of developments that are important for community sustainability this policy has been predicted to have positive effects against a range of the environmental and social SA objectives. Uncertain effects have been predicted against the landscape objective as new developments, even if of appropriate design and scale, could have some adverse effects on local landscapes.

8.4.9 Countryside

- Policy CYD LP1: Enabling Appropriate Development

The policy generally performs well against the SA objectives, although where development will take place on greenfield sites there could be adverse effects on biodiversity, and soils. New development in the countryside is likely to have some localised effects on landscape. The policy enables some low levels of development that could help to maintain the viability of countryside communities and support the local rural economies. Whilst the policy does limit the types and scale of development the policies will help to address some issues relating to the access to services for the more remote areas of the Park.

8.5 Assessment of Enabling Policies

[NB: the policy numbers included in this section of the report refer to the numbering used at the Deposit LDP stage (i.e. that in place when the assessment was undertaken) and not the numbers used in the Final LDP.]

8.5.1 SP1 National Park Policy

This policy has been assessed as having mainly positive effects against the SA/SEA objectives as it seeks to enable development that supports the two 'purposes' of the National Park whilst at the same time assisting the social and economic wellbeing of local communities. Significant positive effects have been predicted in relation to biodiversity, cultural heritage, landscape, population and the economy.

8.5.2 SP2 Major Development in National Park

Given the restrictive nature of this policy it will have positive effects against many of the environmental objectives.

8.5.3 SP3 Environmental Protection

- Policy 2: Important Wild Species
- Policy 3: Biodiversity and Development
- Policy 4: Trees and Development
- Policy 5: Water Resources
- Policy 6: Light Pollution
- Policy 7: Soil Quality
- Policy 8: Air Quality
- Policy 49: Areas of Archaeological Investigation

This strategic policy and supporting policies aim to protect and enhance across a range of environmental and social assets and has been predicted to have positive effects against several SA/SEA objectives. Significant positive effects have been predicted for the water resources, biodiversity, cultural heritage and landscapes objectives in relation to the enhancements that should result from policy implementation.

8.5.4 SP4 Climate Change

This policy addresses both the minimisation of greenhouse gas emissions and adaptation to climate change, with significant positive effects having been predicted against the relevant SA/SEA objectives. There is some uncertainty as to whether the requirement for development to reduce greenhouse gas emissions will result in positive effects against the objectives for transport and material assets (in respect to broadband provision).

8.5.5 SP5 Housing

- Policy 10 Renovation of former Dwellings
- Policy 11 Demolition and replacement of dwellings
- Policy 12 House Extensions and Ancillary Buildings

The development of new housing will inevitably lead to increased energy and resource use as well as increased travel and the loss of greenfield land. There will therefore be potential adverse effects against some SA/SEA objectives. However there is an identified need for housing in many Park settlements, particularly affordable housing, and these policies will help to meet these needs. As a result significant positive effects have been predicted for the population objective. The renovation and re-use of existing dwellings provides opportunities to improve the built environment where the existing buildings are in a poor state of repair or are out of keeping with the character of settlements.

8.5.6 SP6 Affordable Housing

- Policy 13 Enabling Affordable Housing
- Policy 14 Enabling Affordable Housing outside development limits
- Policy 15 Local Needs Housing within Limited Growth Settlements
- Policy 16 Sites for Gypsy and Travellers

The policy has been assessed as having significant positive and positive effects against the SA/SEA objectives for population and economy respectfully as the provision of affordable housing will help to retain younger people in the communities, thereby supporting the vitality of communities and the viability of rural enterprises. The provision of affordable housing outside of existing development boundaries is likely to result in some adverse effects on soils, biodiversity, cultural heritage and local and historic landscapes.

8.5.7 SP7 Waste

- Policy 42 Local Waste Management Facilities
- Policy 43 Energy from Waste Facilities
- Policy 44 Composting

Due to the generally restrictive nature of elements within these policies they have been assessed as having either minor positive or neutral effects against the majority of the SA/SEA objectives, however there is uncertainty as to how the provision of energy from waste plants could affect local air quality and human health, including the perceived risk to health.

Allowing for the provision of local waste facilities will reduce the distance that certain waste streams will need to be transported for processing and will also encourage the take-up of recycling. The requirement in the strategic policy for all development proposals to demonstrate that provision has been made for reducing the production of waste, facilitate the reuse and recycling of waste and ensure safe waste disposal directly supports the SA objective on natural resources and significant positive effects have been identified. Diverting waste from landfill through reduction, recycling, composting and energy from waste will reduce the levels of methane that would be produced if the waste were sent to landfill.

8.5.8 SP9 Renewable energy

The policy has been predicted to have positive effects against SA/SEA objectives on greenhouse emissions and economy (through reduced energy costs). There is uncertainty related to whether any micro hydro-electric power schemes might

affect water supply and quality and biodiversity and also the local landscape, built environment and heritage due the visual impacts that may result from the installation of renewable energy equipment and infrastructure.

8.5.9 SP11 Sustainable Design

- Policy 9 Sustainable Design in the adaption and re-use of buildings

Due to the aim for all proposals to address the principles of sustainable development the predicted effects of these policies are largely positive and for the climate change and natural resources objectives the effects are predicted to be significant. There is uncertainty of the effects in relation to the SA/SEA objective on transport as it is not clear whether the strategic policy, through its reference to provision of infrastructure, encourages improvement of access by more sustainable modes. If it does then this policy should have a positive effect on this SA objective.

8.5.10 SP 12 Economic Wellbeing

- Policy 17 Enabling employment sites and live/work units
- Policy 18 Protection of employments sites and buildings
- Policy 19 Provision of small scale workshops
- Policy 20 Farm Diversification
- Policy 21 Equestrian Facilities
- Policy 22 Storage of Caravans
- Policy 23 New farm and forestry Buildings

The policies support the development of a sustainable economy within the Park and should help to reduce the need to travel to access employment opportunities. The policies should help to maintain the vitality of Park communities by enabling employment opportunities appropriate to the size and character of the settlement to be provided. The protection of employment sites and buildings should help ensure that communities do not suffer from the loss of important employment opportunities and will help to encourage the retention of rural skills. Significant positive effects have been predicted in relation to the population and economy objectives. No adverse effects have been identified in relation to these policies.

8.5.11 SP 13 Retail Strategy

- Policy 24 Town Centres
- Policy 25 Safeguarding Retail Provision
- Policy 26 Neighbourhood, village and rural shops

Concentrating retail in the primary retail frontages will help to maintain the character of town centres and support the tourism sector, with associated spin-offs in other areas of the tourist economy. An improved retail offering within the main towns will also help reduce the need to travel to other centres. Protecting and encouraging appropriate retail provision in the smaller centres should help to sustain and maintain distinctive, local communities, and reduce the need to travel for everyday shopping needs. Significant positive effects have been

predicted for the economy objective. No adverse effects have been identified for these policies.

8.5.12 SP 14 Sustainable Tourism

- Policy 27 New Buildings for Holiday Accommodation
- Policy 28 Non-Permanent Holiday Accommodation
- Policy 29 New or extended sites for touring caravans, camper vans and tents
- Policy 30 New or extended outdoor activity centres
- Policy 31 Rights of way and Long Distance Routes

Development of the tourism sector will help to support the Park's economy and promote the vitality of some settlements thereby having positive effects against social objectives. However the increase in visitor numbers that would result could have adverse effects in terms of greenhouse gas emissions and reductions in local air quality, particularly if the private car is the main mode of travel. Uncertain effects have been identified for biodiversity, due to disturbance, and soil due to erosion of hillside paths.

8.5.13 SP15 Sustainable Communities

- Policy 32 Retention of existing community facilities
- Policy 33 Development of new or extended community facilities
- Policy 34 Welsh Language
- Policy 35 Planning Obligations

The policies have been identified as having positive effects against the social objectives given that they encourage the provision of community facilities that will help to provide services to maintain healthy communities and improve social cohesion. Significant positive effects have been predicted for the population objective. It is uncertain however how the Welsh language policy will help to contribute towards support of the use of the Welsh language through the spatial planning processes.

8.5.14 SP16 Sustainable Infrastructure

- Policy 36 Power lines and pipelines
- Policy 37 Telecommunications
- Policy 38 SUDS

The policies have been assessed as having positive effects against the majority of the SA objectives, with a significant positive effect identified for the natural resources and infrastructure objective. This is because the policies on utilities infrastructure are strongly protectionist in nature, whilst the policy on SUDS could result in beneficial effects across a range of SA topics, including climate change adaptation, water quality and biodiversity.

8.5.15 SP17 Sustainable Transport

- Policy 39 Impact of Traffic
- Policy 40 Provision for cycling and walking

The policies have been identified as being generally neutral or positive against the SA objectives given that they allow for the provision of facilities for public transport, walking and cycling and should help to reduce the need to travel.

8.5.16 SP18 Sustainable Use of Land

- Policy 41 Sustainable Dwelling Density

The policies have been assessed as being positive against the majority of the SA objectives as they aim to maximise the efficiency of land use which will help to reduce adverse effects on the Park's special landscapes. No adverse effects have been identified.

8.5.17 Minerals policies

- Policy 45 Minerals Safeguarding
- Policy 46 Borrow Pits
- Policy 47 Recycled, Secondary Waste Materials
- Policy 48 Inactive Mineral Sites

The generally restrictive nature of these policies means that the effects that have been predicted are largely neutral or positive. Supporting the provision and use of secondary and recycled aggregates is a proactive policy that will help to reduce the demand for primary aggregates and therefore significant positive effects are predicted for the natural resources objective. There is uncertainty against the geodiversity objective as minerals workings can result in important geodiversity 'finds'. A minor adverse effect has been predicted against the economy objective due to the impact the policy may have on local minerals related businesses.

8.6 Site Allocations and Settlement Assessment

8.6.1 Introduction

The specific sites proposed for development in the Deposit LDP generally perform well against the SA objectives, particularly the population objective. However as the majority of the sites are currently greenfield locations, development will inevitably result in some adverse effects such as soil sealing, loss of habitats and local landscape impacts. There are also some flood risk issues associated with a few sites and wider issues relating to waste water infrastructure capacity. Through the site selection process undertaken during the development of the LDP, those sites which through their development would have resulted in significant adverse effects have not been included in the Deposit LDP. The findings of the sustainability appraisal back up those decisions.

The following sections summarise the findings of the assessment for those sites included within the Deposit LDP. In keeping with the methodology described in Section 6.1 and summarised in Section 8.1, the section also provides a summary of the relevant settlement level assessments which pick up on settlement level issues and avoid repetition at the site level.

As discussed in Section 8.3, many of the potential adverse effects described in the assessment summaries below will be mitigated through the requirements of the enabling policies within the LDP.

8.6.2 Brecon Settlement Assessment

Development of housing and employment land in Brecon should have a positive effect on population and the economy. Positive effects have also been forecast for greenhouse gas emissions and sustainable transport as Brecon has a range of local facilities and employment opportunities which should help reduce the need to travel. In addition, the settlement is also well served by public transport.

Adverse effects have been forecast on biodiversity as the River Usk and its tributaries that flow through the town is a SAC and SSSI and could therefore be affected by any development. Adverse effects have also been forecast for cultural heritage and the built environment as there are several Scheduled Ancient Monuments and the majority of the town centre is designated a Conservation Area.

Adverse effects have been forecast for climate change adaptation, as parts of Brecon lie within flood zone C2. Adverse effects have also been forecast for water resources as areas of Brecon suffer from low water mains pressure. In addition, adverse effects have been forecast on natural resources & infrastructure as the local sewerage network and waste water treatment facilities will be unable to accommodate the proposed new development within the settlement. Therefore phasing of development over the plan period will be needed to link in with planned improvements to the waste water treatment works.

8.6.2.1 Brecon Site Assessment

B15 UDP Allocation Cwmfalldau Fields

Development of this greenfield site for residential use could have adverse effects on a number of the environmental objectives, including water quality as it is located within a level 2 Source Protection Zone, landscape as it would extend the settlement to the south and soils as it would result in soil sealing and loss of agricultural land. A second effect on soils, this time assessed as uncertain has been forecast, as the site is located within 350m of a former landfill site and may be subject to contamination. In addition, adverse effects have been forecast on biodiversity, as the site is in close proximity to the River Usk SAC and could also be an otter breeding site.

Adverse effects are forecast on population as the site is alongside the A40 trunk road and therefore there could be noise impacts on new residents.

Positive effects are forecast for greenhouse gas emissions as Combined Heat and Power could be used to service this development.

CS28 Cwmfalldau Fields

Development of this greenfield site for residential use could have adverse effects on a number of the environmental objectives, including water quality as it is located within a level 2 source protection zone; landscape as it would extend the settlement to the south; and soils as it would result in soil sealing and loss of agricultural land. A second effect on soils, this time assessed as uncertain has been forecast, as the site is located within 250m of a former landfill and may be

subject to contamination. In addition, adverse effects have been forecast on biodiversity, as the site is in 650m upstream of the River Usk SAC and could also be an otter breeding site. The site also contains tree/s covered by Tree Preservation Orders.

Adverse effects are forecast on population as the site is alongside the A40 trunk road and therefore there could be noise impacts on new residents.

CS93 Slwch House Field

Development of this greenfield site for residential use would have adverse effects on a number of the environmental objectives, including biodiversity, as there would be some loss or damage of habitats and soils as a result of soil sealing and loss of agricultural land. A second effect on soils, this time assessed as uncertain has been forecast, as the site is located within 50m of a former landfill and may be subject to contamination.

CS132 UDP allocation B17 Opposite High School, North of Hospital

Development of this site for mixed use would have adverse effects on a number of the environmental objectives. There is a potential issue with water quality as surface water is known to escape from the proposed site onto the adjacent footpath. Development at this site would extend this part of Brecon into open countryside thereby having adverse effects on landscape. As this site is greenfield there would therefore be loss or damage of some habitats and would result in soil sealing and loss of agricultural land. There is also a potential issue surrounding bat flight lines and the site contains tree/s covered by two Tree Preservation Orders.

Allocation of mixed use development should support the local economy. In addition, development of this large site could provide a considerable number of affordable homes, thereby having a positive effect on the population objective.

DBR-BR-A Site located to N. of Camden Crescent and to E. of the War Memorial Hospital

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. A second effect on soils, this time assessed as uncertain has been forecast, as the site is located within 50m of a hospital and may be subject to contamination. Adverse effects are also forecast for landscape, as development at this site would extend this part of Brecon into open countryside.

DBR-BR-B Site located the North of Cradoc Close and West of Maen-du well

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. A second effect on soils, this time assessed as uncertain has been forecast, as the site is located within 50m of unknown filled ground and may be subject to contamination. Adverse effects are also forecast for landscape, as development at this site would extend this part of Brecon into open countryside.

8.6.3 Crai Settlement Assessment

This settlement has limited local facilities and no bus service therefore further development here would result in an increased reliance on private cars to access

services with associated increases in greenhouse gas emissions and potential adverse effects on the sustainable transport objective.

In addition, sewerage and waste water treatment infrastructure to serve potential development are at or are nearing capacity and therefore adverse effects have been forecast on natural resources & infrastructure.

Development in Crai could help to meet any need for affordable housing within the settlement thereby having a positive effect on the population objective.

8.6.3.1 Crai Site Assessment

CS43 Land SW of Gwalia

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats, with potential impacts on bat flight lines, and soils as a result of soil sealing and loss of agricultural land. A second effect on soils, this time assessed as uncertain has been forecast, as the site is located within 50m of a former railway and may be subject to contamination.

CS42 Land at Crai

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats, with potential impacts on bat flight lines, and soils as a result of soil sealing and loss of agricultural land. A second effect on soils, this time assessed as uncertain has been forecast, as the site is located within 50m of a former railway and may be subject to contamination.

8.6.4 Crickhowell Settlement Assessment

Crickhowell has a range of local facilities and employment opportunities which should help reduce the need to travel and associated greenhouse gas emissions, although it is likely that some residents will still travel out of the settlement to access their places of employment. A regular bus service runs through this settlement which could encourage some use of sustainable transport. Development in Crickhowell should help to increase vitality of the town and help towards resolving the issue of a lack of affordable housing for the local population. In addition, allocation of employment land should help support the local economy.

Adverse effects have been forecast for climate change adaptation, as parts of the settlement lie within flood zone C2. Development in the settlement may be constrained by the performance of the public sewerage network for which there are no planned improvements within the water company's current capital investment programme. Sewerage treatment capacity issues would require a phased approach to development.

8.6.4.1 Crickhowell Site Assessment

DBR-CR-A Land above Televillage

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats, and soils as a result of soil sealing and loss of agricultural land. Adverse effects are also forecast for climate change adaptation, as there are known pluvial flooding risks in the area.

The site is close to the centre of Crickhowell and would allow easy access to facilities therefore positive effects have been forecast for the population objective.

8.6.5 Llanfihangel Crucorney Settlement Assessment

Llanfihangel Crucorney has a range of local facilities which should help reduce the need to travel. However, there are no employment opportunities within the settlement and residents will therefore need to travel to access their places of employment. Llanfihangel Crucorney also has a regular bus service which could encourage use of sustainable transport.

In Llanfihangel Crucorney adverse effects have been forecast on natural resources & infrastructure, as the waste water treatment works has limited capacity to accommodate all of the planned growth without further improvement. Dwr Cymru has therefore requested phasing of development towards the end of the LDP period.

8.6.5.1 Llanfihangel Crucorney Site Assessment

DBR-LC-D Land opposite Pen-y- Dre Farm

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats, and soils as a result of soil sealing and loss of agricultural land. The site also contains tree/s covered by three Tree Preservation Orders. Adverse effects have been forecast for landscape, as development of this site would extend the settlement into open countryside.

8.6.6 Bwlch Settlement Assessment

This settlement has limited local facilities therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective. However, there is a regular bus service which could encourage some use of sustainable transport.

Housing development in Bwlch should help to increase vitality of the settlement and therefore positive effects have been forecast on the population objective.

8.6.6.1 Bwlch Site Assessment

DBR-BCH-J Land adjacent to Bwlch Woods

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats, including "Lowland Meadows", a "Priority Habitat" in the UK BAP, and soils as a result of soil sealing and loss of agricultural land. Adverse effects have been forecast for landscape, as development of this site would extend the settlement into open countryside.

8.6.7 Libanus Settlement Assessment

This settlement has limited local facilities therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective. However, there is a regular bus service

which could encourage some use of sustainable transport. Adverse effects have been forecast on natural resources & infrastructure, as the waste water treatment works for this area has limited capacity to accommodate all of the planned growth without further improvement. Therefore, phasing of development towards the end of the plan period would be required.

8.6.7.1 Libanus Site Assessment

DBR-LIB-D Land adjacent to Caer-af-Allen

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. Adverse effects have also been forecast on the population objective, as access to this site would be through the existing Caer-af-Allen estate and this could have an adverse effect on the existing residents.

DBR-LIB-E Land adjacent Pen y Fan Close

Development of this disused site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing.

8.6.8 Llanspyddid Settlement and Site Assessment

DBR-LPD-A Land off Heol St Cattwg

Development of this greenfield site for residential use would have adverse effects on a number of the environmental objectives, including effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. The site is within close proximity to Zone 2 of the Brecon Source Protection Zone (SPZ) and therefore potential adverse effects have been forecast on water quality. Adverse effects have been forecast on the built environment and landscape objectives as the site lies within the historic core of the settlement and development here would extend the settlement into open countryside.

Adverse effects have been forecast on natural resources and infrastructure as at the adjacent development, Heol sant Cattwg, the surface water drainage system is already at capacity and no connection to this would be allowed from a new development.

This settlement has limited local facilities therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective. However, there is a regular bus service which could encourage some use of sustainable transport. Potential safety issues related to site access have resulted in adverse effects being forecast for the population objective.

8.6.9 Hay on Wye Settlement Assessment

Hay on Wye has a range of local facilities and employment opportunities which should help reduce the need to travel and associated greenhouse gas emissions, although it is likely that some residents will still travel out of the settlement to access their places of employment. There is also a regular bus service which could encourage use of sustainable transport. A positive effect has also been

forecast, as the allocation of mixed use development should help support the local economy.

The town lies within the Middle Usk Valley Registered Historic Landscape and therefore potential adverse effects have been forecast on cultural heritage. Adverse effects have been forecast for climate change adaptation, as parts of the Hay on Wye are within a flood zone. In addition, adverse effects have been forecast on natural resources & infrastructure as the waste water treatment works for this area has limited capacity to accommodate the proposed planned growth without further improvement. Therefore, phasing of development over the plan period will be required.

8.6.9.1 Hay on Wye Site Assessment

CS136 UDP allocation H6 Former Health Centre

Whilst the majority of this site is previously developed, building on the undeveloped area has been forecast as having an adverse effect on soils and an uncertain effect on biodiversity due to potential for loss or damage to habitats. Whilst the site isn't within a fluvial floodplain there are known flooding issues in the area and therefore adverse effects have been forecast on climate adaptation. As the site lies on the edge of the historic core of the settlement adverse effects have been forecast on cultural heritage.

Allocation of mixed use development should help support the local economy and provide additional employment opportunities. For the population objective, potential safety issues related to site access have resulted in adverse effects being forecast.

DBR-HOW-A Land opposite The Meadows

Development of this greenfield site for residential use would have adverse effects on a number of the environmental objectives, including effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. Adverse effects have also been forecast on landscape as development of this site would extend Hay on Wye into open countryside to the south west of the town.

DBR-HOW-C Land adjacent to Fire Station

Development of this greenfield site for residential use would have adverse effects on a number of the environmental objectives, including effects on biodiversity, as there would be loss or damage of some habitats (including the loss of a hedgerow) and soils as a result of soil sealing and loss of agricultural land. Adverse effects have also been forecast on landscape, as development of this site would extend housing development into open countryside to the south of Brecon Road.

DBR-HOW-K Land adjacent Caemawr Cottages

Development of this greenfield site for mixed use would have adverse effects on a number of the environmental objectives, including effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land.

Allocation of mixed use development should help support the local economy and provide additional employment opportunities.

DBR-HOW-E Land adjacent to Football Field

Although this site is classified as previously developed land, the site is largely undeveloped and therefore adverse effects have been forecast on soils as a result of soil sealing. In addition, the biodiversity value of this site is unknown and therefore uncertain effects have been forecast for this SA objective.

Allocation of mixed use development should help support the local economy and provide additional employment opportunities.

8.6.10 Hirwaun Site Assessment

CS78 Land adjacent to 5th Avenue, Hirwaun Industrial Estate

Development of this industrial site has been forecast to have an adverse effect on a number of the environmental objectives, including biodiversity. Development at this site will not lead to a direct loss of designated habitat but could lead to the fragmentation and loss of supporting habitats used by the Marsh Fritillary Butterfly.

In addition, the site is situated in close proximity to the Cors Bryn y Gaer SSSI (also designated as part of Blaen Cynon SAC) where critical loads for Nitrogen and acid deposition are already being exceeded and some industrial processes could further exacerbate this issue. It should be noted that uncertain effects are forecast on air quality as the type and quantity of emissions will be dependent on the end use of the site

The site is situated right on the Park boundary adjacent to other industrial units. Although it could have an adverse effect on landscape this is unlikely to be significant. In addition, although this site is previously developed land development would result in some soil sealing and part of the site is within a floodplain.

As the site is located at a distance from residential areas development here would result in employees being likely to need to travel to the site by private car and therefore adverse effects have been forecast on greenhouse gas emissions. Uncertain effects have been forecast on sustainable transport as development at the site could affect the proposed creation of a cycle route along Fifth Avenue passing the site.

Positive effects have been forecast on the economy, as development for industrial use should provide local employment opportunities.

8.6.11 Gilwern Settlement Assessment

Gilwern has a range of local facilities and employment opportunities which should help reduce the need to travel and associated greenhouse gas emissions, although it is likely that some residents will still travel out of the settlement to access their places of employment. There is also a regular bus service which could encourage use of sustainable transport.

Adverse effects have been forecast on climate change adaptation as part of the settlements is within a fluvial floodplain. Additionally, adverse effects have been forecast on natural resources & infrastructure as the water company are only able to accommodate the foul flows from the medium capacity densities only and

further development allocations may be constrained by limits to the waste water infrastructure for which there is no planned improvement. Waste water treatment works for this area also has limited capacity to accommodate all of the planned growth without further improvement.

8.6.11.1 Gilwern Site Assessment

CS102 Lancaster Drive

Development of this greenfield site for residential use would have adverse effects on a number of the environmental objectives, including effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. Development would also extend this part of the settlement into open countryside to the north and east and therefore adverse effects have been forecast on landscape.

The site is not within a fluvial floodplain, however the canal is near the site and its flood risk needs to be fully investigated and therefore uncertain effects have been forecast on climate change adaptation.

The size of the development should help to provide a moderate level of affordable housing that will help to support any local housing need and thereby a positive effect has been forecast on the population objective. However, the industrial unit to the east of the site uses solvent based products as part of its process, therefore future residents on the east side of the development could experience strong odours and noise issues.

8.6.12 Clydach Settlement Assessment

Clydach has limited local facilities therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective, although there is a bus service which could encourage some use of sustainable transport.

As part of Clydach is within a flood zone adverse effects have been forecast on climate change adaptation. In addition, part of this settlement is located on a principal aquifer, which has a high level of water storage and which may support water supply and/or river base flow on a strategic scale. Therefore development here could have an adverse effect on water quality. Finally, waste water treatment works for this area has limited capacity to accommodate all of the planned growth without further improvement and therefore adverse effects have been forecast on natural resources & infrastructure.

8.6.12.1 Clydach Site Assessment

DBR-CL-D Land adjacent to Dan Y Coed

Development of this unmaintained land for residential use has been forecast to have adverse effects on a number of environmental objectives. For example, on soils as a result on soil sealing and on landscape as a result of the removal of the buffer between the A465 and the existing built form. Adverse effects have been forecast on biodiversity as development could result in loss or damage to the "Lowland Calcareous Grassland", a "Priority Habitat" in the UK BAP, which is

located on the site. A second effect on soils, this time assessed as uncertain has also been forecast, as the site is located adjacent to land that's historic use may have resulted in contamination.

Adverse effects have been forecast on the population objective as a result of potential noise impacts from the A465 on any future residents. In addition, removal of trees to develop this site would also reduce the noise buffering effect for the existing residents.

8.6.13 Govilon Settlement Assessment

Govilon has a range of local facilities and employment opportunities which should help reduce the need to travel and associated greenhouse gas emissions, although it is likely that some residents will still travel out of the settlement to access their places of employment. There is also a regular bus service which could encourage use of sustainable transport.

As part of this settlement is within the Blaenavon Industrial Landscape World Heritage Site adverse effects have been forecast on cultural heritage.

In addition, adverse effects have been forecast on climate change adaptation and natural resources & infrastructure, as part of Govilon is within a flood zone and because the waste water treatment works for this area has limited capacity to accommodate all of the planned growth without further improvement. Further effects on natural resources & infrastructure have been forecast, as Dwr Cymru advise that they are only able to accommodate the foul flows from the low capacity densities. Further development allocations may be constrained by limits to the waste water infrastructure for which there is currently no planned improvement.

8.6.13.1 Govilon Site Assessment

CS70 Land adjacent to Ty Clyd (UDP allocation GV1), Govilon

CS88 Land at Ty Clyd (UDP allocation GV1), Govilon

CS89 Land at Ty Clyd

CS99 Land at Ty Clyd (adjacent to Ty Clyd House)

CS69 Land at Ty Clyd

CS39 Field at Boat Farm

Development of these greenfield sites for residential use would have adverse effects on a number of the environmental objectives, including effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. The sites also contain two areas covered by Tree Preservation Orders. Adverse effects have also been forecast on landscape, as development of these sites would extend Govilon to the east into open countryside.

The sites are not within the fluvial floodplain. However, the canal is near the site and its flood risk needs to be fully investigated and therefore uncertain effects have been forecast on climate change adaptation.

8.6.14 Llangors Settlement Assessment

Govilon has a range of local facilities and employment opportunities which should help reduce the need to travel and associated greenhouse gas emissions, although it is likely that some residents will still travel out of the settlement to access their places of employment.

Part of the settlement is within a flood zone and therefore adverse effects have been forecast on climate change adaptation. Development may be constrained by the performance of the public sewerage network for which there are no planned improvements within the current capital investment programme and therefore adverse effects have been forecast on natural resources & infrastructure. Finally, the village lies within the Middle Usk Valley Registered Historic Landscape and therefore potential adverse effects have been forecast on cultural heritage.

8.6.14.1 Llangors Site Assessment

DBR-LG-D UDP allocation LGS1

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land.

8.6.15 Pennorth Settlement Assessment

Pennorth has limited local facilities and no bus route, therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective. The village lies within the Middle Usk Valley Registered Historic Landscape and therefore potential adverse effects have been forecast on cultural heritage.

Positive effects have been forecast on the population objective as there is a waiting list for affordable housing in the area and therefore residential development could help to reduce this list.

8.6.15.1 Pennorth Site Assessment

DBR-PNT-D Land adjacent to Ambelside

Development of this site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing. Positive effects have been forecast on the population objective as the development could help to provide for any local affordable housing.

8.6.16 Llanigon Settlement Assessment

Llanigon has limited local facilities and no bus route, therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective. The settlement lies within the Middle Usk Valley Registered Historic Landscape and therefore potential adverse effects have been forecast on cultural heritage.

Part of the settlement is within a flood zone and therefore adverse effects have been forecast on climate change adaptation. Finally, for this village the water

company advise that they are able to accommodate the foul flows from the medium capacity densities only and further development allocations may be constrained by limits to the waste water infrastructure for which there is currently no planned improvement. Waste water treatment works for this area also has limited capacity to accommodate all of the planned growth without further improvement.

8.6.16.1 Llanigon Site Assessment

DBR-LGN-D Land opposite Llanigon County Primary School

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. The site also lies on the edge of the historic core of the settlement and therefore adverse effects have been forecast on cultural heritage.

Positive effects have been forecast on the population objective as the site is well integrated to existing services and is close to the local school.

8.6.17 Talgarth Settlement Assessment

Talgarth has a range of local facilities and employment opportunities which should help reduce the need to travel and therefore reduce growth in associated greenhouse gas emissions, although it is likely that some residents will still travel out of the settlement to access their places of employment. There is also a regular bus service which could encourage use of sustainable transport. Development in Talgarth, in particular additional housing, should help to increase vitality and promote regeneration of the town and therefore positive effects have been forecast on the population objective. In addition, allocation of mixed use development should help support the local economy.

The Talgarth area is especially vulnerable to flooding and therefore adverse effects have been forecast on climate change adaptation. It is important that future development does not increase runoff, exacerbating flooding in the local watercourses. The settlement also lies within the Middle Usk Valley Registered Historic Landscape and therefore potential adverse effects have been forecast on cultural heritage.

The waste water treatment works for this area has limited capacity to accommodate all of the planned growth without further improvement therefore adverse effects have been forecast for natural resources & infrastructure. Development within this settlement may also be constrained by the performance of the public sewerage network for which there are no planned improvements within the water companies current capital investment programme.

8.6.18 Talgarth Site Assessment

T9 UDP allocation Land North of Doctors Surgery

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. Part of the site lies in the C2 flood zone, with a larger area in the type B flood zone. As a result adverse effects have been forecast against the climate change adaptation objective. Development in the area of C2 will need to be avoided.

The dismantled Llynfi valley railway, which is important for industrial heritage, cuts through the proposed development site and would be affected by the development and therefore adverse effects have been identified for cultural heritage. As site comprises some previously developed land, which may be subject to potential contamination, uncertain effects have also been identified for soil.

CS137 UDP allocation T6 Hay Road (DSO and Wireguards)

Development of this previously developed site for mixed use could have a potential effect on existing trees and hedges. However, as the value of these assets is unknown uncertain effects have been forecast on biodiversity. Uncertain effects have also been forecast on soils, as the site is a former transport/ road haulage depot and factory/works and may be subject to potential contamination which could be remediated through re-development.

Positive effects have been forecast for landscape as redevelopment could improve the quality of the townscape in this area. In addition, allocation of mixed use development should help support the local economy, although there will be some of loss of existing employment land.

8.6.19 Talybont on Usk Settlement Assessment

The settlement has limited local facilities therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective. However, there is a regular bus service which could encourage some use of sustainable transport.

Parts of the settlement are within a flood plain and therefore adverse effects have been forecast on climate change adaptation. The settlement also lies within the Middle Usk Valley Registered Historic Landscape and therefore potential adverse effects have been forecast on cultural heritage.

For this village the water company advise that they are able to accommodate the foul flows from the low capacity densities only and further development allocations may be constrained by limits to the waste water infrastructure for which there is currently no planned improvement. As a result adverse effects have been forecast on natural resources & infrastructure. In addition, the waste water treatment works for this area has limited capacity to accommodate all of the planned growth without further improvement.

Positive effects have been forecast on the population objective as development within the settlement could help to meet local housing need for affordable housing and help to support the viability of existing local services.

8.6.19.1 Talybont on Usk Site Assessment

CS127 Land at Maesmawr Farm

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats, with potential impacts on bat flight lines, and soils as a result of soil sealing and loss of agricultural land.

The site is consistent with the existing boundary of the built form however the level of potential development is inappropriate given the small size of the settlement. Therefore adverse effects have been forecast on the built

environment. However, the size of the development provides the potential for the provision of a moderate level of affordable housing which has been forecast as having a positive effect on the population objective.

8.6.20 Pencelli Settlement Assessment

The settlement has limited local facilities therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective. However, there is a regular bus service which could encourage some use of sustainable transport.

Parts of the settlement are within a flood plain and therefore adverse effects have been forecast on climate change adaptation. For this village the water company advise that they are able to accommodate the foul flows from the low capacity densities only and further development allocations may be constrained by limits to the waste water infrastructure for which there is currently no planned improvement. As a result adverse effects have been forecast on natural resources & infrastructure. In addition, the waste water treatment works for this area has limited capacity to accommodate all of the planned growth without further improvement.

8.6.20.1 Pencelli Site Assessment

CS120 Land south of Ty Melys and East of oak view

Development of this previously developed land for residential use could result in some soil sealing and the loss of surrounding trees and hedgerows. The site lies on the edge of the historic core of the settlement and as a result adverse effects have been forecast for cultural heritage. However, development at this site provides an opportunity to improve the quality of the townscape.

DBR-PENC-B Land adjacent Pen-y-Bont

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats. It is important to note that the adjacent canal is used as a commuting route and feeding area for lesser horseshoe bats from the nearby Pencelli Mill population and probably also by a population from a roost further east. Some areas adjacent to the canal are also used for roosting and feeding. Development of the site would result in soil sealing and the loss of unmaintained agricultural land.

8.6.21 Llanbedr Settlement Assessment

Llanbedr has limited local facilities and no bus route therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective.

For this village the water company advise that they are able to accommodate the foul flows from the low capacity densities only and further development allocations may be constrained by limits to the waste water infrastructure for which there is currently no planned improvement. As a result adverse effects have been forecast on natural resources & infrastructure. In addition, the waste water treatment works for this area has limited capacity to accommodate all of the planned growth without further improvement.

8.6.21.1 Llanbedr Site Assessment

DBR-LBD-A Land adjacent St Peter's Close

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. Adverse effects have also been forecast on landscape, as development would extend the settlement into open countryside.

8.6.22 Pontsticill Settlement Assessment

The scale of the potential development in Pontsticill could be considered as inappropriate given the small size of the settlement and as a result adverse effects have been forecast on the built environment and landscape.

The settlement has limited local facilities therefore further development here would result in an increased reliance on private cars to access services with associated increases in greenhouse gas emissions and a potential adverse effect on the sustainable transport objective. However, there is a regular bus service which could encourage some use of sustainable transport.

This settlement is located on a principal aquifer which has a high level of water storage and which may support water supply and/or river base flow on a strategic scale. Therefore potential adverse effects have been forecast on water quality.

For this village the water company advise that they are able to accommodate the foul flows from the low capacity densities only and further development allocations may be constrained by limits to the waste water infrastructure for which there is currently no planned improvement. As a result adverse effects have been forecast on natural resources & infrastructure. In addition, the waste water treatment works for this area has limited capacity to accommodate all of the planned growth without further improvement.

8.6.22.1 Pontsticill Site Assessment

CS139 UDP allocation PST1

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. Adverse effects have also been forecast on cultural heritage and landscape, as the lane on the northern edge of the site is a possible Roman or medieval road and development of this site would extend the settlement into open countryside.

CS55 Land adjacent to Penygarn

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. Adverse effects have also been forecast on landscape, as development of this site would extend the settlement into open countryside.

CS91 Land to the west of Pontsticill House, Pontsticill

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land. Adverse effects have

also been forecast on cultural heritage and landscape, as the lane on the northern edge of the site is a possible Roman or medieval road and development of this site would extend the settlement into open countryside. However, this site has been judged as having much less of a visual impact on the settlement than the other proposed sites for Pontsticill. It is important to note that development of this site would only be appropriate following the development of CS139.

DBR-PSTC-C Land at end of Dan-y-coed

Development of this greenfield site for residential use would have adverse effects on biodiversity, as there would be loss or damage of some habitats and soils as a result of soil sealing and loss of agricultural land.

8.7 Cumulative Effects

The following section summarises the assessment of the LDP against each of the SA/SEA objectives including the consideration of cumulative, synergistic and secondary effects. An overview of how each SA/SEA objective is influenced by the LDP can be found by reading vertically down the relevant columns in Figure 8-2.

8.7.1 SA1: Climate Change Adaptation

Ensure that adequate measures are in place to adapt to the impacts of climate change.

The accumulation of the positive and significant positive effects identified in the assessment indicates that overall the LDP should have a **significant positive cumulative** effect on climate change adaptation through objectives and policies to ensure development is resilient and adaptable to the likely effects of climate change and to avoid developing in areas at risk of flooding. These effects should be apparent through to the medium and long term. No negative effects have been identified.

The majority of the site allocations are located outside areas at risk from flooding, however there are some issues that will need to be resolved at a site level.

8.7.2 SA2: Greenhouse Gas Emissions

Mitigate effects on climate change by reducing greenhouse gas emissions in both existing and new development.

The assessment identified some negative effects on this objective due to the inevitable increase in greenhouse gas emissions associated with the proposed housing growth. However overall, by concentrating the majority of growth in the key settlements the LDP should help to minimise increases in greenhouse gas emissions as new development will be located near to the main areas for employment, shopping and other facilities and services.

In addition, the policies encouraging efficient energy use through sustainably designed buildings and the use of renewable energy should also help to minimise the growth in greenhouse gas emissions. The effects are likely to be more

positive in the medium and long terms, as in the short term there will not have been the time for the policies to be fully implemented. The accumulation of positive and significant positive effects indicates the LDP should have a positive cumulative effect on climate change mitigation.

8.7.3 SA3: Air Quality

To maintain or improve air quality.

Enabling housing growth in the Park may contribute to localised air pollution through increased vehicle activity, although the effects are not forecast to be significant. However, as growth is concentrated in the key settlements, the strategy should minimise overall increases in emissions of air pollutants from transport due to the reduced need to travel for employment, shopping and other facilities. For the primary and key settlements, development will also focus on supporting the provision of sustainable modes of transport which should also help to reduce localised emissions to air in the medium and long terms.

However the significance of this effect is dependent upon a successful shift to more sustainable modes which would reduce the overall number of vehicles on the road. This shift will in part be dependent on levels of behavioural change to using lower/zero emitting modes of transport and travel. Additional vehicle activity associated with an increased number of tourists could have adverse effects on local air quality and add to diffuse pollution. No significant effects have been identified.

8.7.4 SA4: Water Quality

Maintain or improve water quality, and minimise the adverse effects of land use on water quality.

Two of the LDP policies are identified as having uncertain effects on water quality. Concentrating development in key settlements could result in greater surface run-off due to larger areas of impermeable surfaces, while specifically, development in Brecon could have some adverse effects on the River Usk and development in Talgarth could affect the Wye and its tributaries. However, the significance of the effects will be dependent on the specific locations of the development sites in relation to the water bodies and any potential for indirect effects.

Secondly, if the development of micro renewable energy technologies leads to the development of hydro-electric power this could have a negative effect on water quality, although micro-hydro projects should have minimal effects.

Positive effects have been identified for a number of the policies. Enabling development that conserves or enhances the natural beauty and wildlife of the National Park could indirectly help to maintain or improve water quality. The policy to protect and enhance the water environment is identified as having a positive effect and the policies to encourage the use of SUDs, and to ensure the safe disposal of waste should also have positive effects on water quality. No negative effects have been identified.

8.7.5 SA5: Water Quantity

Promote sustainable use of water resources and minimise adverse effects on water quantity.

Negative effects have been identified on water quantity as a result of SP10 'Strategic Policy' and SP5 'Housing', as providing new houses will put direct additional pressure on water resources which are already under pressure in most areas of the Park. The effect is likely to increase over time as more dwellings are built and risk of drought increases. However due to the limited number of new dwellings proposed the effect is not considered to be significant.

Positive effects have been identified for a number of the policies which encourage more sustainable use of water resources, ensure all developments will protect and enhance the water environment and ensure developments are resilient and adaptable to climate change and this should help to reduce the negative effects identified above.

Therefore, although the assessment identified negative effects on water resources due to the proposed housing growth, the accumulation of positive mitigating effects indicate the LDP may have a relatively neutral effect on the availability of water. No significant effects were identified.

8.7.6 SA6: Soil

To protect and enhance soil quality (including non-chemical soil functions and processes such as permeability) and quantity, especially of carbon rich soils.

Overall, the implementation of the LDP is likely to have a minor negative effect on soils as a result of proposed housing and employment growth which will lead to some soil loss, sealing and compaction. However Policy 7 'Soil Quality' requires the adherence to Defra's code of practice relating to soils and should ensure that adverse effects on soil quality from new development are minimised, whilst several of the other policies within the LDP should help to mitigate these effects by only allowing development that conserves and enhances the natural beauty of the Park and protecting ecology, biodiversity and special landscapes all of which should have an indirect positive effect on soils. In addition the restrictions relating to minerals extraction will also help to protect some soils from adverse effects. No significant effects were identified.

8.7.7 SA7: Geodiversity

Conserve geodiversity and promote the understanding and enjoyment of geodiversity.

The accumulation of the positive effects identified in the assessment from policies which aim to protect and enhance geodiversity assets indicates the LDP may have a positive cumulative effect on geodiversity assets in the Park.

However there remains some uncertainty over the effect of Policy SP8 'Minerals Resources' and Policy SP16 'Sustainable Infrastructure', as refusing permission for new or extended minerals working may limit the number of new geodiversity

sites that emerge and the provision of new infrastructure to service developments could adversely impact upon geodiversity.

8.7.8 SA8: Biodiversity

To value, conserve and enhance the diversity of species, habitats and ecosystems.

Positive effects were identified for biodiversity as result of the environmental protection policies as they actively support the protection and enhancement of biodiversity within the Park, including protection of important wild species, preventing habitat fragmentation, protection of linear features (e.g. hedgerows and woodland belts), dark corridors and lesser horseshoe bat roosts, consideration of future management regimes and protection of trees. Positive effects were also identified as a result a number of other policies, in particular SP1 'National Park Policy' which commits to enabling development that conserves or enhances the natural beauty, wildlife and cultural heritage of the National Park.

However there could be some localised adverse effects on biodiversity, as although concentration of growth in key settlements should help minimise adverse effects, there may be biodiversity value of the individual sites that are developed. The majority of the proposed sites are greenfield locations and development would therefore result in the loss of some areas of habitat and impacts on species. As a result adverse effects have been identified relating to SP5 'Housing' and the policies for the key and primary settlements. A minor adverse effect has also been identified for Policy SP6 'Affordable Housing' as the policy allows for development of affordable housing outside of existing development boundaries which could lead to development on greenfield land with biodiversity value.

8.7.9 SA9: Cultural Heritage

To understand, value, protect and manage historic landscapes, scheduled ancient monuments and other archaeological features appropriately.

Positive effects were identified for this objective as a result of Policy SP3 'Environmental Protection', as it ensures that all developments will protect and enhance the Park's special qualities, which includes its historic landscapes. The policy also ensures the protection and enhancement of identified special landscapes and cultural heritage, including archaeological features and historic landscapes. Positive effects were also identified as a result of five other policies, in particular SP1 'National Park Policy' which commits to enabling development that conserves or enhances the natural beauty, wildlife and cultural heritage of the National Park.

However there could be some localised adverse effects on cultural heritage features, as although concentration of growth in key settlements should help minimise the effects on historic landscapes, the effects of the proposed growth in the Park will be dependent on the location of sites. There therefore remains some uncertainty over the effect of the Strategic Policy SP10 and depending on the location of new developments there is potential for minor adverse cumulative

effects on historic landscapes, and features of cultural importance within the Park.

Renewable energy generation equipment encouraged in Policy SP9 'Renewable Energy' could also have a negative effect on historic landscapes, however the effect is likely to be minor due to the scale of developments that will be permitted. NB: the policy prevents the development of major renewable energy schemes which would potentially have had a significant adverse effect.

8.7.10 SA10: Built Environment

Maintain and enhance the quality of the built environment.

Positive effects were identified for this objective relating to Policy SP3 'Environmental Protection', as it ensures that all developments will protect and enhance the Park's special qualities, which includes its sense of place. The policy also ensures the protection and enhancement of identified special landscapes and the character and assets of built heritage. Positive effects were also identified as a result of a number of other policies. In particular, SP11 'Sustainable Development' requires developments to be in line with the NPA's Sustainable Design Guide which requires developments to be responsive to context and local distinctiveness. These positive effects are likely to occur in the medium to long term when the policies have been implemented and there has been the opportunity for the benefits to become apparent.

Concentrating growth in key settlements may adversely affect local character and townscape in those towns, although conversely new development could provide the opportunity for improving some currently degraded townscapes. By focussing growth on the key settlements those smaller settlements that will not be subjected to as much development will be protected from loss of character.

Renewable energy generation equipment encouraged in Policy SP9 'Renewable Energy' could have a negative effect on the built environment however the effect is likely to be minor due to the scale of developments that will be permitted. The policy prevents the development of major renewable energy schemes which would potentially have had a significant effect.

8.7.11 SA11: Landscape

Maintain and enhance the Park's landscape character and its associated features.

Positive effects were identified for this objective relating to Policy SP3 'Environmental Protection', as it ensures that all developments will protect and enhance the Park's special qualities, which includes its landscapes. The policy also ensures the protection and enhancement of identified special landscapes. Positive effects were also identified as a result of four other policies, in particular SP1 'National Park Policy' which commits to enabling development that conserves or enhances the natural beauty, wildlife and cultural heritage of the National Park. Significant positive effects have been identified for this policy.

However, although concentration of growth in key settlements should help minimise the effects on landscapes the effects of the proposed growth in the Park will be dependent on the location of sites. Therefore there remains some

uncertainty over the effects of the Strategic Policy SP10 and depending on the location of new developments there is potential for minor adverse cumulative effects on landscape within the Park.

Policy SP6 'Affordable Housing' allows for development of affordable housing outside of existing development boundaries, which could lead to a small amount of development on greenfield land. In addition, provision of 100% affordable housing developments on the edge of settlements as allowed by the settlement policies could also have some adverse effects on local landscapes.

Renewable energy generation equipment encouraged in Policy SP9 'Renewable Energy' could have a negative effect on landscapes however the effect is likely to be minor due to the scale of developments that will be permitted. The policy prevents the development of major renewable energy schemes which would potentially have had a significant effect.

8.7.12 SA12: Natural Resources and Infrastructure

Make sustainable use of natural resources and build and maintain environmentally friendly, high quality, services and infrastructure.

Housing and employment growth as allowed by SP10, will inevitably put demand on natural resources and result in increased waste generation although policies do encourage the re-use of existing buildings. Other policies also support the redevelopment of existing buildings which will help reduce the demand for new building materials. Also, concentrating development could lead to an increase in levels of recycling, as it is more likely that recycling centres will be easily accessible to new developments.

Concentrating development in Brecon and the key settlements could put pressure on sewerage infrastructure in these towns. However this concentration is likely to make it easier for DCWW to provide upgrades to the sewerage infrastructure than if a more dispersed pattern of growth were to be adopted. Allowing the development of new dwellings in small settlements could also place pressure on infrastructure (e.g. sewerage), although the phasing of the release of land for development will help to reduce the adverse effects on all forms of utility infrastructure.

Significant positive effects have been predicted against this objective in relation to the policies associated with waste management and overall there could be a positive cumulative effect through: requiring developments to make provision for reducing waste and facilitating the re-use and recycling of waste; concentrating development which could make recycling centres more accessible; and encouraging the reduction of construction waste and use of recycled building materials.

Positive effects are also predicted against Policy SP11 'Sustainable Design', as the Sustainable Design Guide promoted by this policy encourages reducing construction waste, re-using existing buildings, using recycled building materials and using low impact building materials.

Positive effects were also identified relating to Policy SP8 'Minerals Resources' as safeguarding mineral resources from sterilisation will make them available for extraction by future generations. However, it is unclear whether safeguarding

will be maintained after the life of the plan and therefore the effect in the long term is uncertain. In addition, supporting the provision and use of secondary and recycled aggregates will help to reduce the demand for primary aggregates.

8.7.13 SA13: Transport

Increase sustainable transport opportunities.

Positive effects have been identified relating to Policy SP10 as concentrating development in the major settlements where there is access to services and facilities will help to reduce reliance on the private car.

There remains uncertainty over the effects of several of the policies on this objective. For example Policy SP4 'Climate Change' which expects all developments to reduce greenhouse gas emissions could mean increased opportunities for sustainable transport opportunities, whilst in addition SP11 'Sustainable Development', which requires developers to contribute to the provision or maintenance of a wide range of facilities, services and infrastructure, may have a positive effect if the policy encourages improved access by sustainable modes. However the success of these policies will be dependent on the necessary levels of behavioural change that persuade people to use sustainable modes of transport over the private car.

Policy SP6 'Affordable Housing' allows for the development of affordable housing outside the existing development boundaries which could have a negative effect on increasing opportunities for sustainable travel, as services may not be located close enough to the proposed developments to allow for walking or cycling. No cumulative or synergistic effects have been identified.

8.7.14 SA14: Population

Maintain distinctive cultural identity and ensure the needs of the changing demographics are reflected.

Overall the policies within the LDP should have significant positive effects on this objective. In particular, the provision of affordable housing is an important factor in securing the long term sustainability of the communities in the Park and the LDP seeks to facilitate this. As a result significant positive effects are predicted against Policy SP6 'Affordable Housing'. Due to the phasing of new development that will form part of the LDP the effects are more likely to be felt in the medium to long term.

By focusing development in the key settlements, the LDP will support regeneration of these towns and enable the provision of services to meet the needs of the towns and their surrounding areas. Also, allowing development that meets demonstrated local needs in smaller settlements should help to maintain and improve viability and community vitality in these settlements and their hinterlands.

The range of policies in the LDP should also result in positive effects for the health and wellbeing of the local population through the provision and improved access to facilities (including health and recreation facilities); protection of public open space; greater opportunities for walking and cycling; regeneration of areas

currently suffering from higher levels of deprivation; controlling levels of pollution from new development; and improving the quality of the built environment. In addition, policies that seek to maintain the special qualities of the Park will also help to have positive effects on wellbeing.

The accumulation of the positive effects identified in the assessment indicates that the LDP should have a significant positive cumulative effect on the population objective, by increasing the provision of housing, employment and local community facilities. These positive outcomes will take some time to come into effect and should be evident in the medium to long term.

There is uncertainty in relation to Policy SP9 'Renewable Energy', if the additional cost of installing renewable energy into affordable housing means that the number or size of the new houses that can be provided is compromised.

8.7.15 SA15: Accessibility

Promote and improve accessibility to the Park and to its opportunities and facilities.

Many of the policies are identified as having no predicted effects on improving accessibility to the Park and its facilities. Positive effects were identified for Policy SP3 'Environmental Protection' as the policy ensures that all developments will protect and enhance public open space and recreation facilities. Positive effects were also identified for Policy SP1 'National Park Policy' as providing development that provides for, or supports, the understanding and enjoyment of the Park could lead to developments which will improve the accessibility of the Park's facilities and services.

Finally, positive effects were identified for the settlement policies as these support proposals which strengthen and support sustainable access to the towns and their wider regions. No significant effects were identified. No cumulative or synergistic effects have been identified.

8.7.16 SA16: Education and Skills

Increase opportunities to build an education and skills base.

Concentrating new development in the key settlements with improved associated accessibility to educational facilities could help towards achievement of this objective, however the significance of the effect is deemed to be uncertain. Strategic Policy SP10 focuses on ensuring the protection and provision of community services and facilities in all settlement and this should help to protect education and training facilities. Also allowing for some growth, outside key settlements in particular, should help to maintain local community services including local education facilities. Many of the policies are identified as having no predicted effects on increasing education opportunities.

Policies SP9 'Renewable Energy' and SP11 'Sustainable Design' could lead to an increase in training opportunities and skills in sustainable construction techniques. Policy SP11 also requires all proposals for development to contribute to the provision or maintenance of a wide range of facilities, services and infrastructure, which should also have a positive effect on this objective. No

significant effects were identified. No cumulative or synergistic effects have been identified in relation to this objective.

8.7.17 SA17: Economy

Promote a thriving, locally-based economy.

The LDP aims to support economic growth in the key settlements that will help to facilitate the regeneration of these towns and provide employment opportunities for the wider area. In Brecon the settlement policies encourage proposals which strengthen and enhance employment opportunities within the town utilising mixed use sites and or live work schemes serving the town and region and which strengthen and enhance retail provision within the town which will help to support and sustain the local economy. It also encourages proposals which strengthen and enhance the tourism offer within Brecon in accordance with the sustainable tourism strategy for the NP including appropriate new guest accommodation and the creation of appropriate new visitor attractions / facilities.

The settlement policies for Crickhowell, Talgarth and Hay on Wye are similar to those for Brecon, but with elements that deal with local issues. The Crickhowell settlement policies place extra emphasis on the encouragement of an enhanced night time economy based around specialism in local produce as well as retail provision based on local products and crafts. For Talgarth the settlement policies support the necessary economic regeneration of the town, whilst for Hay on Wye the settlement policies encourage proposals which strengthen the "cultural capital" status of the town.

Policies for the Level 3 and 4 settlements support local rural economies by allowing the provision of appropriately scaled new and extended employment facilities, retail and tourism developments.

Outside listed settlements the LDP also supports appropriate levels of economic related development which should help to maintain the vitality of rural communities and their local economies (e.g. in the agricultural and tourism sectors).

Many of the policies are identified as having positive effects on this objective. The accumulation of the positive effects identified in the assessment indicates that the LDP should have a positive cumulative effect on the local economy.

One potential adverse effect has been identified, as implementation of SP8 'Minerals' does not allow for new or extended minerals working and this could therefore have a negative effect on the local minerals industry. It is unclear whether this policy will be maintained after the life of the plan and therefore the effect in the long term is uncertain. No significant effects were identified.

8.8 Cross Boundary Effects

The relatively low levels of development that are proposed in the LDP means that there are unlikely to be any significant effects on neighbouring areas outside of the Park. However it is likely that some of the positive effects that have been predicted to result from the implementation of the LDP will result in some benefits to communities situated in close proximity to the Park. For

example any increase in the number of tourists visiting the Park is likely to help neighbouring local economies in towns such as Abergavenny and Llandovery, whilst increased opportunities for walking and cycling will improve recreation opportunities for those living outside the Park boundary. However, any significant increase in tourist traffic visiting the Park could have adverse effects on neighbouring local authority areas due to an increase in levels of through traffic.

Limiting minerals extraction within the Park could lead to increased extraction in other areas in order to maintain the provision of aggregates. However it is uncertain as to which other areas will be affected by this issue.

Cross boundary effects linked to the employment site allocation "CS78: Land adjacent to 5th Avenue, Hirwaun Industrial Estate" are likely, as this is a site that straddles the border of the Park in Rhondda Cynon Taf. However it is the cross-boundary effects on the Park from the RCT LDP allocation (rather than vice-versa) that are likely to be more significant as this allocation results in development inside the Park which detracts from the Park's Special Qualities³⁸.

8.9 Difficulties encountered in undertaking the assessment

As discussed in Section 3.5 there have been difficulties in obtaining Park-specific data due to the fact that much information is collected for Unitary Authority (UA) areas and the Park straddles nine UAs. This has resulted in some uncertainties as to what the actual Park level baseline is for certain topics and what trends exist.

Through the large geographical area and the wide scope of the topics covered by the LDP there is uncertainty as to how the plan will result in certain changes being manifested on the ground and whether the necessary behavioural changes will result in order to bring about the desired outcomes. This has led to some uncertainty in the SA/SEA assessment.

³⁸ NB: the site assessment undertaken on the equivalent RCT LDP site (site 446 North of Fifth Avenue, Hirwaun Industrial Estate) did not identify any significant issues.

9 Mitigation and recommendations

A key role of the SA/SEA is to provide recommendations as to how the sustainability performance of a plan can be improved. The LDP already includes a range of policies that seek to prevent and where possible enhance the environment and overall sustainability of the plan. The SA/SEA has built on this by identifying a range of recommendations as to how LDP can maximise its performance against the range of sustainability topics. Some of these recommendations seek to mitigate potential adverse effects, whilst others look to build on some of the opportunities that are presented by Park's wealth of environmental resources. The majority of the recommendations made throughout the SA process have now been incorporated into the LDP. Examples include:

- Encouraging the protection and enhancement of wildlife corridors;
- Consideration of policy elements relating to the location of development to reduce the need to travel or to link in with existing public transport, and walking and cycling networks; and
- Encouraging the use of more sustainable modes of transport, including public transport, cycling and walking.

While undertaking the assessment of the Deposit LDP a number of further specific recommendations, were suggested to the NPA to either mitigate potential adverse effects or build on some of the opportunities that are presented by the Park's wealth of environmental resources. (see Table 9-1). The majority of these recommendations were taken on board as the LDP developed. In addition, a range of minor recommendations for changes to the wording of supporting text were made, all of which were incorporated into the Deposit LDP.

Table 9-1: Policy related recommendations

[NB: the policy numbers included in this section of the report refer to the numbering used at the Deposit LDP stage (i.e. that in place when the recommendations were made) and not the numbers used in the Final LDP.]

Policy	Recommendation	Action Taken
SP3 Environmental Protection, Policy 2 Important Wild Species, Policy 3: Biodiversity and Development, Policy 4 Trees and Development, Policy 5 Water Resources, Policy 6 Light Pollution, Policy 7 Soil Quality, Policy 8 Air Quality	The additional policy and supporting text wording recommended by the Habitats Regulations Assessment needs to be taken into account when finalising the biodiversity section of the LDP.	Policy and supporting text has been amended.
SP4 Climate Change	Policy elements (b) "limit and mitigate the causes of climate change" and (c) "minimise greenhouse emissions" cover the same issue. Element (c) could be deleted without weakening the policy.	Policy amended.
Policy 16 Sites for Gypsy	Policy 16 "Sites for Gypsy and Travellers" is	Recommend

and travellers	lacking an element requiring the sites to have access to local facilities and services. At the moment the only services the policy refers to are those that can be provided (i.e. water and electricity).	ation not incorporated at the Deposit stage.
Policy 11 Sustainable Design	A policy name of "Sustainable Design" would more accurately reflect the content of this policy, especially given the wide range of issues covered by the term "Sustainable Development".	Policy name amended.
SP 14 Sustainable Tourism, Policy 27 New Buildings for Holiday Accommodation, Policy 28 Non-Permanent Holiday Accommodation, Policy 29 New or extended sites for touring caravans, camper vans and tents, Policy 30 New or extended outdoor activity centres, Policy 31 Rights of way and Long Distance Routes	The policy should be supplemented through a requirement for sustainable tourist transport to be considered in new tourist developments (e.g. through travel plans or through location close to public transport routes).	Not updated. The sustainable transport policies cover this area.
SP17 Sustainable Transport, Policy 39 Impact of Traffic, Policy 40 Provision for cycling and walking	The strategic policy should include elements relating to the location of development to reduce the need to travel or to link in with existing public transport, and walking and cycling networks. In addition the strategic policy could encourage the provision of walking and cycling infrastructure. Policy 40 provides the detailed criteria as to whether it would be permitted, but there could be more of a requirement set at the strategic policy level.	Policy amended.
Policy 35 Planning Obligations	This policy is geared towards preventing "loss" rather than encouraging any "gain".	Recommendation not incorporated at the Deposit stage.

9.1 How the SA/SEA has influenced the development of the LDP

To date the SA/SEA has had a range of influences on the development of the LDP. Close liaison between the planning officers and SA/SEA consultants has meant that the SA/SEA has provided input at several stages during the development of the Strategic Development Options, Preferred Strategy and Deposit LDP documents.

When the LDP is adopted it will be accompanied by an SEA Adoption Statement which will need to describe how the LDP has been influenced by the SA/SEA. Influences to date include the following:

- A Scoping Workshop attended by NPA planning officers, members of environmental bodies (CCW and EAW) and SEA and HRA consultants, provided a useful forum for discussing environmental issues and how the LDP could respond to these issues. The workshop also helped in determining the scope of the SA/SEA and HRA processes;
- Production of the SA/SEA Scoping Report identified issues that the LDP will need to help address. The information within the Scoping Report will also contribute to the LDP evidence base;
- Provision on input into the development of the LDP objectives;
- Assessment of the Spatial Development Options, which assisted in the process of formulating the Preferred Strategy;
- Provision of on-going input in relation to the development of the Strategic Policies and detailed policies;
- Providing input during the development of the Candidate Site Assessment methodology;
- Additional assessment and recommendations relating to the strategic policy on the Sustainable Distribution of Development; and
- Assessment of the Deposit LDP, including Spatial Strategy, Enabling Policies and Site Allocation and providing recommendations.

10 Post-Deposit Stage Sustainability Appraisal

10.1 Introduction

Following the consultation on the Deposit LDP in late 2010, and prior to the finalisation of the LDP for adoption, a number of changes to the LDP were proposed. Further sustainability appraisal was undertaken to determine whether the inclusion of the changes would be likely to have significant sustainability effects beyond those already identified in the Deposit LDP SA Report. This further assessment was undertaken at four stages, as follows:

- Proposed Focused Changes – October 2011;
- Additional Focused Changes – September 2012;
- Potential School Closure Sites – February 2013; and
- ‘Matters Arising’ Changes – June 2013.

The findings of the additional sustainability appraisal are summarised in Sections 10.2 to 10.5, with the detailed assessments being provide in Appendices H – K respectively.

10.2 SA of Focused Changes to the Deposit LDP

Sustainability Appraisal was undertaken in relation to the Focused Changes to the Deposit LDP that were proposed by the National Park Authority following the consultation on the Deposit LDP in November 2010 and on Alternative Sites in spring 2011. The findings of the appraisal were reported in a SA Report Addendum (October 2011) – see Appendix I. The proposed changes were considered at the examination of the LDP, conducted by a Planning Inspector.

The Focused Changes that were recommended were varied in nature, including:

- Policy additions and amendments;
- The inclusion of additional sites for future development; and
- Changes to the structure of the LDP and updates to supporting text to improve clarity.

Based on the proposed Focused Changes the SA/SEA was updated to consider the implications of the changes in terms of whether or not the LDP, based on the changes proposed, would be more, or less, likely to deliver towards the achievement of the SA objectives.

10.2.1 Assessment Methodology

The aim of this stage of the SA/SEA process was to determine whether there are likely to be any significant sustainability effects arising from the changes to the plan.

Given that many of the proposed changes were minor in nature, it would not have been proportionate to undertake a full assessment on all of the changes and it was therefore necessary to identify those changes which could potentially result in significant effects. This was undertaken through an initial screening process which considered the significance of the focused change and if there was likely to be a significant sustainability effect as a result of that change. The

screening was confined to changes relating to proposed policy changes and changes to sites. Changes to the supporting text were not screened on the basis that in-themselves they would not result in changes to the LDP direction.

For those changes identified as being likely to result in significant effects a more detailed assessment was then undertaken using the same methodologies that were used for the SA/SEA of the Deposit LDP.

All **new** policies, site allocations, and development boundary extension sites were taken forward for further assessment irrespective of their potential effects, on the basis that they needed to be subjected to the same level of assessment as those policies/sites that were included in the Deposit LDP.

10.2.2 Assessment

10.2.2.1 Screening Assessment

The results of the Screening Assessment of all proposed policy changes and changes to site allocations are provided in Appendix I.

Of the 104 changes that were screened, only 25 were identified as warranting further detailed assessment. These related to 16 new policies, 5 site allocations and 4 boundary extension sites, as outlined below:

New Policies:

- Notifiable Installations
- Sites of European Importance
- Sites of National Importance
- Sites of Importance for Nature Conservation
- Ancient Woodland and Veteran Trees
- Water Quality
- Listed Buildings
- Demolition of Listed Buildings
- Setting of Listed Buildings
- Buildings of Local Importance
- Conservation Areas
- Historic Parks and Gardens
- Historic Landscapes
- Gypsy and Traveller Site
- Water and Sewage Supply for New Development
- Use of Non Mains Sewerage Solutions

Site Allocations:

- DBR-BR-GT1 Gypsy and Traveller Site
- DBR-BR-E1 Brecon Enterprise Park
- SALT 002/092 Castle Farm
- SALT 058 Land adjoining Defynnog Road
- CS138 Land at Glannau Senni

Boundary Extension Sites:

- SALT 019 Canal Bank Gardens
- SALT 060 Land within Green Meadows
- SALT 088 Amendment to Gilwern White Land
- SALT 086 Talgarth Development Boundary Amendment

An additional number of changes were identified as likely to have some effects but not at a level significant to warrant separate assessment. A short description of these minor effects is provided the screening assessment table in Appendix I.

The remainder of the changes were considered as negligible in terms of their effects on sustainability and were not considered further in the SA/SEA.

10.2.2.2 Additional Assessment

As outlined above 16 new policies, 5 site allocations and 4 boundary extension sites underwent additional assessment as a result of the screening process.

The detailed results of the additional assessments are provided in Appendix I.

10.2.3 Conclusion

A significant number of focused changes to the LDP were recommended at this stage, however in total only 16 new policies, 5 site allocations and 4 boundary extension sites were considered significant enough to warrant re-assessment through the SA/SEA process.

Of the 25 assessments, none concluded that the changes will have a significant adverse effect upon any of the SA/SEA objectives and as before where adverse effects have been identified against particular policies or site allocations, several of the strategic and detailed policies will help to minimise the potential adverse effects that have been identified.

A number of significant positive and minor positive effects against the SA objectives were identified as a result of the new assessments. The significant positive effects were in support of the following SA objectives:

Biodiversity – through the new policies on ‘Sites of European Importance’; ‘Sites of National Importance’; ‘Sites of Importance for Nature Conservation’; and ‘Ancient Woodland and Veteran Trees’. This further supports the significant positive effects that were identified against this objective in the SA of the Deposit LDP.

Cultural Heritage and Built Environment - through the new policies on ‘Listed Buildings’; ‘Demolition of Listed Buildings’; ‘Setting of Listed Buildings’; ‘Buildings of Local Importance’; ‘Conservation Areas’; ‘Historic Parks and Gardens’; and ‘Historic Landscapes’.

Additionally for a number of the changes which were identified as likely to have some effects, but not at a level significant to warrant separate assessment, the changes supported numerous SA objectives, including those on ‘biodiversity’, ‘cultural heritage’, ‘landscape’, ‘soil’, ‘natural resources and infrastructure’, ‘greenhouse gas emissions’ and ‘population’.

10.3 SA of Additional Focused Changes to the Deposit LDP

Further Sustainability Appraisal was undertaken in relation to Additional Focused Changes to the Deposit LDP that were proposed by the National Park Authority following the consultation on the Focused Changes in December 2011. The findings were presented in a second Sustainability Appraisal Report Addendum (September 2012) – see Appendix J.

The Additional Focused Changes that were recommended related to the following:

- Policy additions and amendments; and
- Changes to the structure of the LDP and updates to supporting text to improve clarity.

The same methodology was used for this additional Sustainability Appraisal to that described in Section 10.2.1 above.

10.3.1 Screening Assessment

The results of the Screening Assessment of all proposed additional focused changes are provided in Appendix J.

Of the 42 changes that were screened, three were identified as warranting further detailed assessment. These related to two new policies and one policy amendment as outlined below:

New Policies:

- **Housing Requirement:** The identified housing requirement for the Brecon Beacons National Park is 1990 dwellings between 2007 and 2022; and
- **Employment Land Requirement:** The identified requirement for employment land within the Brecon Beacons National Park over the LDP period is 1.5ha. This requirement is to be met through the development of employment and mixed use allocations for B Class purposes.

Amended Policies:

- Policy SP5 Housing.

An additional number of changes were identified as likely to have some effects but not at a level significant to warrant separate assessment. A short description of these minor effects is provided in the screening assessment table in Appendix J and summaries of these are provided below in Section 10.3.2.

The remainder of the changes were considered as negligible in terms of their effects on sustainability and were not considered further in the SA/SEA.

10.3.2 Additional Assessment

As outlined above two new policies and one amended policy sites underwent additional assessment as a result of the screening process.

The detailed results of the additional assessments are provided in Appendix J. A summary of the assessment findings is provided below. In addition, this section also provides summaries of a number of the minor effects identified.

10.3.2.1 Chapter 6: Housing

Proposed Additional Focused Changes to Chapter 6 policies and their implications for the SA/SEA were as follows.

AFC-6-5: Addition of a new policy

"Housing Requirement: The identified housing requirement for the Brecon Beacons National Park is 1990 dwellings between 2007 and 2022."

This new policy was found to result in no implications for the original assessment of the housing policies (SA Report – October 2010) as it simply identifies the evidence based requirement for new housing numbers and will not in itself result in any sustainability effects.

AFC-6-8 and **AFC-6-9:** These changes update the level of housing provision for the plan period in 'SP5 Housing' and include a split of how this will be supplied between Total Completions (2007-2011), Allocations, Commitments and Windfalls. Policy SP5 identifies a supply of 1,996 houses.

AFC-6-16: The change confirmed that the Gypsy and Traveller site (DBR-BR-GT1) that was assessed in the SA Report Addendum – October 2011, has been granted planning permission. No update to the SA required.

AFC-6-18: Minor change to policy to clarify the elements of the development that should be designed in local materials and adequately screened. No update to the SA required.

10.3.2.2 Chapter 7: Economic Wellbeing

Proposed Additional Focused Changes to Chapter 7 policies and their implications for the SA/SEA were as follows.

AFC-7-5: Minor amendments and restructuring of Policy SP12 Economic Wellbeing, which were found as having no implications for the SA/SEA.

AFC-7-11: Addition of a new policy

"Employment Land Requirement: The identified requirement for employment land within the Brecon Beacons National Park over the LDP period is 1.5ha. This requirement is to be met through the development of employment and mixed use allocations for B Class purposes."

This new policy was found to result in no implications for the original assessment of the employment policies (SA Report – October 2010) as it simply identifies the evidence based requirement for employment land and will not in itself result in any sustainability effects.

AFC-7-16: Change widens scope of Policy 19 'Provision of Employment Generating Development' (formerly 'Provision of Small Scale Workshops') but does not alter its potential effects as the permitting criteria remain unchanged. Additional wording helps to strengthen the policy's protection of the National Park which will further support the built and environment and landscape objectives, but which do not change the findings of the earlier assessment.

AFC-7-17: Change reduces scope of Policy 17 'Live Work Facilities' (formerly 'Enabling Appropriate Employment Sites & Live/Work Units'), with some elements having been incorporated into Policy 19 (see AFC-7-16). Additional wording helps to strengthen the policy's protection of the National Park. This will further support the positive effects already identified by the SA for the 'built environment' and 'landscape' objectives.

AFC-7-21: Additional wording added to Policy 18 'Protection of Employment Sites and Buildings' that strengthens the protection of employment sites from loss to other uses. This has positive implications for the SA 'Economy' objective but there is no requirement to update the SA as significant positive effects are already forecast for this objective in relation to the Chapter 7 policies.

10.3.3 Conclusion

Of the Additional Focused Changes to the LDP that were recommended, two new policies and one amended policy were considered significant enough to warrant re-assessment through the SA/SEA process. The additional assessments concluded that the changes would not result in any significant effects upon any of the SA/SEA objectives.

10.4 SA of Potential School Closure Sites

Further Sustainability Appraisal was undertaken in relation to the Schedule of Potential School Closure Sites. The findings were presented in a third Sustainability Appraisal Report Addendum (February 2013) – see Appendix K.

10.4.1 Potential School Closure Sites

Nine school sites in the Brecon Beacons National Park, which have either already been closed or which are in the process of being closed in the near future, were identified as having the potential to provide housing on the sites.

The sites considered were as follows:

- SS-CD Cwmdu Church In Wales School, Cwmdu
- SS-HOW Hay-on-Wye County Primary School
- SS-LIB Libanus County Primary School, Libanus
- SS-PYC Pen y Cae County Primary School, Pen y Cae
- SS-TAL Talgarth County Primary School, Talgarth
- SS-PN Ysgol Thomas Stephens, Pontneddfechan
- SS-BR St Joseph’s Primary School, Brecon
- SS-LH Darrenfelin Primary School, Llanelly Hill
- SS-GOV Govilon Primary School, Govilon

Following consultation three of these sites were ruled out from further consideration as they are situated outside settlement boundaries. These three sites were: Cwmdu Church In Wales School; Libanus County Primary School; and Pen y Cae County Primary School.

The remaining six sites were subjected to assessments through the SA/SEA process.

10.4.2 Methodology

The aim of this stage of the SA/SEA process was to determine whether there were likely to be any significant sustainability effects arising from the potential changes to the LDP.

The same methodology was used to assess the sites as had been used for previous rounds of site assessment – at the Deposit LDP and the Proposed Focus Changes stages (see Section 8 of the Deposit LDP SA Report, October 2010).

10.4.3 Assessment

The detailed results of the additional assessments are provided in Appendix K.

One new significant adverse effect was identified, this being in relation to climate change adaptation SA objective for site SS-BR (Brecon) which is situated in flood zone C2.

10.5 SA of Matters Arising Changes to the Deposit LDP

10.5.1 Introduction

Further Sustainability Appraisal was undertaken in relation to the Matters Arising Changes to the Deposit LDP that were proposed by the National Park Authority following the examination hearings for the Brecon Beacons Local Development Plan (LDP) and the publication of the Inspector's preliminary findings on Housing and Employment Land Provision (April 2013). The findings of the appraisal were reported in the fourth Sustainability Appraisal Report Addendum (June 2013) – see Appendix L.

The Matters Arising Changes that were recommended are varied in nature, including:

- Policy additions and amendments;
- The inclusion of additional sites for future development; and
- Changes to the structure of the LDP and updates to supporting text to improve clarity.

In relation to housing allocations, the Inspector requested that the NPA consider 11 additional sites within, or in proximity to, Hay on Wye, Talgarth and Crickhowell, for inclusion in the LDP in order to provide sites for at least 200 dwellings. At an Extraordinary General Meeting (EGM) on 11th June 2013 the NPA debated each of these sites and determined which sites should be included as additional allocations in the LDP.

Based on the proposed Matters Arising Changes, the SA/SEA was updated to consider the implications of these changes in terms of whether or not the LDP, based on the changes proposed, would be more, or less, likely to deliver towards the achievement of the SA objectives.

10.5.2 Assessment Methodology

The same methodology was used for this additional Sustainability Appraisal to that described in Section 10.2.1 above.

Changes proposed to monitoring (LDP Chapter 11) were not screened as they do not in themselves result in changes to the plan direction.

10.5.3 Screening Assessment

The results of the Screening Assessment of all Matters Arising Changes are provided in Appendix L.

Of the 99 changes that were screened, only 13 were identified as warranting further detailed assessment. These related to one new policy, one amended policy and 11 site allocations, as outlined below:

New Policy:

- Enabling B Use Class Employment Use outside Settlement Boundaries and Settlement Extents

Amended Policy:

- Policy SP5 Housing:

The change updates the level of housing provision for the plan period in 'SP5 Housing'. An explanation of how the housing allocation numbers have evolved in the LDP is provided in Box 10-1.

Box 10-1: Explanation of LDP housing numbers

The scale of housing provision included in Policy SP5 has increased from 841 in the Deposit LDP, to 1,331 in the Focused Changes (October 2011)¹, to 1,996 in the Additional Focused Changes, and now to 2,451/2,487 in the Matters Arising Changes.

However, this does not mean that an additional 1,610/1,646 dwellings will be built compared to the original Deposit LDP. Instead it reflects a different approach to reporting the figure as explained below.

Deposit LDP

841 new dwellings made up entirely from allocations (106 available for development prior to 2016 and 735 available for development from 2016 onwards). This is to ensure that necessary improvements to essential infrastructure for waste water treatment can be planned for and implemented as requested by Welsh Water.

Focused Changes

1,331 new dwellings made up from 833 allocations (145 up to 2016 / 688 from 2016 onwards) and 498 dwellings contributed on windfall sites.

Additional Focused Changes

1,996 new dwellings made up from 989 allocations (this includes 159 dwellings that were previously included as part of the LDP Chapter 7 'Mixed-Used Site' section and therefore did not appear in the Chapter 6 housing figure), 638 windfall, 185 commitments (these are sites with extant permission which were not included in the previous figures) and 184 completions (these are dwellings that have already been built during the period 2007-2011 and which count towards the housing supply for the LDP plan period).

Matters Arising Changes

2,451/2,487 new dwellings made up from 1,027/1,063 allocations (range of 225-261 new allocations identified at BBNPA EGM on 11th June 2013; some allocations have now moved to commitments from Additional Focused Changes), 150 windfall, 430 dwellings small site contribution (based on an average of the past 10 years), 420 commitments (sites with extant permission at an agreed base date of 1st April 2012), 107 school sites (programme of primary school closures by Powys CC and Monmouthshire CC – figure deemed to be additional to existing windfall), 251 completions (dwellings built in the period 2007-2012) and 66 units under construction (those under construction as at 1st April 2012).

Summary

The increase from 1,996 dwellings in the Additional Focused Changes to 2,451/2,487 can be attributed to a number of factors; slight adjustments in figures; additional commitments have been identified as a result of the base date 1st April 2012 being used as a cut off (sites with extant permissions at this date are classed as commitments); 225-261 new allocations have been identified and approved by members; 107 dwellings have been contributed by school sites and 66 units have been contributed by those under construction as at 1st April 2012.

Notes

¹ a figure of 1,339 was included in the Focused Changes (October 2011) and 1,336 in the SA Report Addendum. These were in error and should have read 1,331. NB: this has no implications for the sustainability appraisal or HRA findings.

Potential Site Allocations

As described in Section 10.5.1, at an EGM on 11th June the NPA made decisions as to which sites to allocate in the LDP, from a list of 11 sites provided by the Inspector for consideration.

Prior to the EGM a Sustainability Appraisal had been undertaken on each of the 11 sites, based on the proposed use and scale of development that were recommended to Members in the papers prepared for the EGM. These Sustainability Appraisals were also made available for the EGM.

Decisions made at the EGM rejected four sites from inclusion in the LDP and approved four sites for allocation in line with officer recommendations. For the remaining three sites the Members approved the allocation, but with changes being made to the type or scale of the allocation.

A summary of the sites that have been considered, along with the decisions made at the EGM, is provided in Table 10-2.

Details on the Sustainability Appraisals for these sites are provided in Appendix L. Where there have been changes in use or scale of development as a result of the decisions made at the EGM, the relevant appraisals have been updated to reflect these changes. For the purpose of completeness, both the pre-EGM and post-EGM appraisals are included in Appendix L.

Table 10-2: Sites requested for consideration by the Inspector

Site	Pre-EGM Proposed use	EGM Proposed for allocation Yes/Yes with change/No	Post-EGM Proposed use in MACs
Land Opposite 'The Meadows', Hay-on-Wye	Residential	Yes	78 residential units (site is allocated in the Deposit LDP for 20 residential units, therefore an increase of 58 residential units)
Land adjoining 'Brecon Pharmaceuticals', Hay-on-Wye	Residential	Yes	5 residential units
Land adjacent to Coed-y-Bryn, Talgarth	Residential	No	
Land adjacent to Hay Road, Talgarth	Residential	Yes with change	0.6ha employment use
Proposed extension to T9, Talgarth	Mixed Use	Yes with change	Mixed use allocation comprising 15 residential units and new primary school
Land adjacent to main car park, Talgarth	Residential	No	
The Former Mid Wales Hospital, Talgarth	Mixed Use	Yes with change	Mixed use allocation comprising 57-93 residential units; 0.35 ha of employment (B1) and/ or medical use (D2); conversion of chapel to provide community use; reinstatement of cricket pitch and tennis courts for

			community use; and provision of new landscaping and areas of public open space
Cwrt-y-Gollen, Crickhowell	Mixed Use	Yes	Mixed use allocation comprising 70 residential units and 1.8 ha employment use
Land adjacent to Llangenny Lane, Crickhowell	Residential	Yes	20 residential units
Land adjacent to Standard Street, Crickhowell	Residential	No	
Land adjacent to CS3 Standard Street, Crickhowell	Residential	No	

An additional number of changes were identified as likely to have some effects, but not at a level significant to warrant separate assessment. A short description of these minor effects is provided in the screening assessment tables in Appendix L.

The remainder of the changes were considered as negligible in terms of their effects on sustainability and were not considered further in the SA/SEA.

10.5.4 Additional Assessment

As outlined above two new/amended policies and 11 site allocations underwent additional assessment as a result of the screening process. The detailed results of the additional assessments are provided in Appendix L.

The policy assessments did not identify any new significant effects, although they did provide further support for previously predicted significant effects as follows:

- New policy "Enabling B Use Class Employment Use outside Settlement Boundaries and Settlement Extents" supports existing significant positive effects for the 'population' and 'economy' objectives that were predicted for strategic policy 'SP12 Economic Wellbeing'; and
- Amendment to Policy SP5 Housing supports existing significant positive effects for the 'population' objective. However, the updated assessment for this policy also identified an overall change in the assessment from neutral to minor negative for the landscape objective, as development of the larger new housing allocations will result in some impacts on local landscapes.

The site assessments identified two new potential significant effects as follows:

CS117: Proposed extension to T9, Talgarth

- Significant adverse effects were identified for the SA 'landscape' objective as the site is in a prominent location outside the settlement boundary and would therefore have significant adverse effects on the local landscape.

CS111: The Former Mid Wales Hospital, Talgarth

- Significant adverse effects were identified for the SA 'landscape' objective as development of this site in open countryside would have significant adverse effects on the National Park landscape.

No new significant positive effects were identified in the additional assessments.

10.5.5 Conclusion

A large number of focused changes to the LDP were recommended, however in total only one new policy, one amended policy and 11 site allocations were considered significant enough to warrant re-assessment through the SA/SEA process.

Of the 13 detailed assessments, two predicted that proposed changes to the LDP would have a significant adverse effect upon the SA 'landscape' objective. However, several of the strategic and detailed policies in the LDP will help to minimise the potential adverse effects that have been identified in the assessments.

A number of minor negative and minor positive effects against the SA objectives were identified as a result of the new assessments, particularly in relation to the site allocations. Additionally, for a number of the changes which were identified as likely to have some effects, but not at a level significant to warrant separate assessment, the changes support numerous SA objectives, including those on 'biodiversity', 'landscape', 'population' and 'economy' – these are reported in Appendix L.

10.6 Summary of post-Deposit Sustainability Appraisal

Following the consultation on the Deposit LDP four additional rounds of sustainability appraisal have been undertaken as summarised in Sections 10.2 to 10.5 above. The additional assessment has identified new significant effects, both positive and negative – beyond those already identified for the Deposit LDP.

The significant positive effects identified are in support of the SA objectives for 'Biodiversity'; 'Cultural Heritage'; and 'Built Environment' in relation to a range of new policies proposed at the Focused Changes stage (October 2011).

The new significant adverse effects have been identified in relation to two site allocations that were introduced as 'Matters Arising Changes' (June 2013). These sites are 'CS117: Proposed extension to T9, Talgarth' and 'CS111: The Former Mid Wales Hospital, Talgarth'. In both cases the significant adverse effects were identified for the SA 'landscape' objective.

Overall the changes do not affect the main findings of the SA Report which found that generally the LDP is likely to have positive Park-wide effects across the range of sustainability topics.

11 Monitoring

11.1 Introduction

The SEA Directive requires that the significant environmental effects of implementing a plan are monitored so that the appropriate remedial actions can be taken if required.

The monitoring put in place needs to fulfil the following requirements:

- To monitor the significant effects of the plan;
- To monitor any unforeseen effects of the plan;
- To ensure that action can be taken to reduce / offset the significant effects of the plan; and
- To provide baseline data for the next SEA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

11.2 Monitoring Measures

The assessment of the LDP identified the following significant effects which will need to be monitored.

Positive effects

- Climate Change Adaptation (SA1) and Greenhouse Gas Reduction (SA2) related to Policies SP4: 'Climate Change' and SP11: 'Sustainable Design';
- Water Resources (SA5) through the policy on Water Resource Issues Zones (Policy 5 in the Deposit LDP, now Policy 11 in the Final LDP);
- Biodiversity (SA8) in relation to SP1 (National Park Policy) and SP3 Environmental Protection, including its supporting policies covering biodiversity;
- Cultural Heritage (SA9) in relation to SP1 (National Park Policy) and SP3 Environmental Protection, including its supporting policies covering the historic environment;
- Landscape (SA11) in relation to SP1 (National Park Policy) and SP3 Environmental Protection, including its supporting policies Trees and Development (Policy 4 in the Deposit LDP, now Policy 8 in the Final LDP) and Light Pollution (Policy 6 in the Deposit LDP, now Policy 12 in the Final LDP);
- Natural Resources and Infrastructure (SA12) through policies on Sustainable Design (SP11), Sustainable Infrastructure (SP16), Waste (SP7) and the recycling of minerals (Policy 47 in the Deposit LDP, now Policy 67 in the Final LDP);
- Population (SA14) in relation to the Spatial Distribution of Development (SP10), National Park policy (SP1) and policies relating to housing (SP5), affordable housing (SP6), economic wellbeing (SP12) and Sustainable Communities (SP15); and
- Economy (SA17) in relation to National Park policy (SP1) and policies relating to economic wellbeing (SP12) and retail (SP13).

Adverse effects

- Landscape (SA11) in relation to site allocations 'CS117: Proposed extension to T9, Talgarth' and 'CS111: The Former Mid Wales Hospital, Talgarth'.

The National Park Authority is required by the Welsh Government to produce an Annual Monitoring Report (AMR). This includes a monitoring framework which provides indicators and targets linked to each of the LDP Strategic Policies. Some of these indicators will address the monitoring requirements for the SA/SEA and therefore where appropriate have been incorporated into the LDP SA/SEA monitoring framework.

In addition, measures for monitoring the SA/SEA of the National Park Management Plan are also in place. These cover all the SA objectives used for the SA/SEA of the LDP, with the majority of the indicators also being relevant to monitoring the effects of LDP implementation. These will also therefore be used in the LDP SA/SEA monitoring framework.

The monitoring framework presented in Table 11-1 below provides the indicators that will be used to monitor the SA/SEA of the LDP. Indicators shown in plain text are from the National park Management Plan SA/SEA Monitoring Framework. Indicators in ***bold italics*** are from the LDP Monitoring Framework.

Table 11-1: LDP Monitoring Framework

SA/SEA OBJECTIVES	INDICATORS
1. Ensure that adequate measures are in place to adapt to the impacts of climate change.	<ul style="list-style-type: none"> • Planning schemes meeting the National requirements for sustainable design and in line with the NPA's Sustainable Design Guide. • Planning permissions approved causing significant concerns for potential transport impacts. • <i>Number of planning applications which consider Climate Change adaptation techniques with a Design and Access Statement.</i>
2. Mitigate effects on climate change by reducing greenhouse gas emissions in both existing and new development.	<ul style="list-style-type: none"> • Amount of development (indicated by Tan 15 para 5.1 Development category) permitted in C1 & C2 floodplain areas not meeting all TAN 15 tests (para 6.2). • Planning schemes for micro renewable energy appropriate to their location and special qualities of the National Park. • <i>Permitted and installed capacity (MW) of renewable electricity and heat projects within the National Park.</i>
3. To maintain or improve air quality.	<ul style="list-style-type: none"> • Local authority air quality monitoring indicators (1,3-butadiene, benzene, carbon monoxide, lead, NO₂, PM₁₀, SO₂).

SA/SEA OBJECTIVES	INDICATORS
4. Maintain or improve water quality, and minimise the adverse effects of land use on water quality.	<ul style="list-style-type: none"> • Compliance with water quality objectives under the Water Framework Directive. • Percentage of new development with Sustainable Urban Drainage Systems. • River water phosphate and nitrate levels.
5. Promote sustainable use of water resources and minimise adverse effects on water quantity.	<ul style="list-style-type: none"> • No. of developments incorporating water conservation measures, such as grey water systems. • Incidences of low flows/droughts and the onset of low flow related abstraction licence conditions.
6. To protect and enhance soil quality (including non-chemical soil functions and processes such as permeability) and quantity, especially of carbon rich soils.	<ul style="list-style-type: none"> • Pesticide concentrations and nutrient loads in water bodies.
7. Conserve geodiversity and promote the understanding and enjoyment of geodiversity.	<ul style="list-style-type: none"> • No. and condition of sites of geological importance in favourable condition. • Number of geological sites being used for their intended purpose (e.g. education, geo-tourism). • No. of active landscape-scale conservation projects in the Park.
8. To value, conserve and enhance the diversity of species, habitats and ecosystems.	<ul style="list-style-type: none"> • No. of active landscape-scale conservation projects in the Park. • Number of agri-environmental schemes including provision for wildlife. • Status and trends for Biodiversity Action Plan target species and habitats. • No. of SSSI sites in favourable condition. • Connectivity and fragmentation status of key wildlife habitats categories across the Park. • Percentage of woodland habitat restored to upland blanket bogs, upland heathland and upland oakwoods. • Proportion of priority habitats that are isolated from other appropriate habitats.
9. To understand, value, protect and manage historic landscapes, scheduled ancient monuments and other archaeological features appropriately.	<ul style="list-style-type: none"> • % of historic landscape with up to date character appraisal. • No. of parks and gardens recorded as being in satisfactory/ good condition. • No. of Scheduled Ancient monuments

SA/SEA OBJECTIVES	INDICATORS
	<p>recorded as being in satisfactory/ good condition.</p> <ul style="list-style-type: none"> • No. of planning applications which have conditions attached to ensure the protection archaeological resources. • Amount of development with an impact on Historic Landscape Designations. • Number of Conservation Areas with up to date Area Assessments.
10. Maintain and enhance the quality of the built environment.	<ul style="list-style-type: none"> • No. of Listed Buildings at risk. • % of Conservation Areas with up-to-date character appraisal. • No. of building in Conservation Areas affected by detrimental changes.
11. Maintain and enhance the Park's landscape character and its associated features.	<ul style="list-style-type: none"> • Area of land given over to development each year. • No. of active landscape-scale conservation projects in the Park. • Amount of Greenfield and open space lost to development (ha) which is not allocated in the LDP. • Participation in Catchment Sensitive Farming initiatives. • Level of light pollution.
12. Make sustainable use of natural resources and build and maintain environmentally friendly, high quality, services and infrastructure.	<ul style="list-style-type: none"> • Permissions approved causing significant concerns for potential transport impacts • Development proposals demonstrating a provision for reducing waste, facilitating the reuse & recycling of waste, and safe waste disposal has been made. • Ecological footprint of listed settlements.
13. Increase sustainable transport opportunities.	<ul style="list-style-type: none"> • Permissions approved without improving traffic and parking management and providing appropriate access for cyclists and pedestrians. • No. of initiatives supported by the SDF to develop and support sustainable transport initiatives designed to reduce the carbon footprint.
14. Maintain distinctive cultural identity and ensure the needs of the changing demographics are reflected.	<ul style="list-style-type: none"> • % of Park's population having some knowledge of Welsh. • Distances travelled per person per year

SA/SEA OBJECTIVES	INDICATORS
	<p>by mode of transport.</p> <ul style="list-style-type: none"> • Number of consents granted and new dwellings completed annually. • Number of affordable dwellings granted consent per annum • Number of affordable dwellings completed per annum
15. Promote and improve accessibility to the Park and to its opportunities and facilities.	<ul style="list-style-type: none"> • Visitor surveys to measure visitor satisfaction. • Distances travelled per person per year by mode of transport. • Hectares of recreational open space per 1000 population (FIT Standard) in line with constituent Unitary Authorities
16. Increase opportunities to build an education and skills base.	<ul style="list-style-type: none"> • No. of groups brought to the Park by Community Champions.
17. Promote a thriving, locally-based economy.	<ul style="list-style-type: none"> • Approvals for farm diversification schemes. • Employment land development on Policies SE3 and PX sites in hectares • Annual vacancy rates of the town centres of the National Park.