**ADVICE TO SNOWDONIA NATIONAL PARK AUTHORITY**

# Shadow Habitats Regulations Assessment of the Consultation draft National Park Management Plan

## STATUS: CONSULTATION DRAFT

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# 1 Relevant background and introduction

## 1.1 Relevant background

1.1.1 Snowdonia National Park Authority (SNPA) is required to prepare a Management Plan for the National Park. The plan being developed seeks to set out how the park authority will work with other stakeholders to secure the National Park purposes. The plan identifies nine special qualities to help to understand and define what needs to be safeguarded and to build the content of the plan itself. The nine special qualities are as follows:

1. Diverse landscapes
2. Community cohesion
3. Vibrancy of the Welsh language
4. Inspiration for the arts
5. Tranquillity and solitude
6. Extensive recreation opportunities
7. Historic landscapes
8. Renowned geology
9. Internationally important species and habitats

1.1.2 For the purpose of an assessment of the plan under the Habitats Regulations, it is relevant to note that the first part of the plan describes these special qualities and then identifies facts, special places and keywords for each of them. This initial part of the report is contextual and provides relevant background against which the details of the plan are then further developed. The main 'Partnership Plan' is set out in detail in the second half of the document which identify a series of 13 outcomes and associated underpinning policies and actions, divided under the National Park's two statutory purposes and their duty in carrying out these purposes i.e. in 3 main sections. These outcomes and policies will provide the main framework within which decisions concerning management of the National Park will be made.

## 1.2 Habitats Regulations of plans generally

1.2.1 SNPA is a competent authority under the Conservation of Habitats and Species Regulations 2017[1], commonly referred to as the Habitats Regulations. In accordance with Regulation 63 of those regulations, SNPA must make an assessment of their Management Plan as a matter of law before it is put into effect[2]. This assessment is generally referred to as a 'Habitats Regulations Assessment' or 'HRA' and the regulations set out a clearly defined step-wise process which must be followed.

1.2.2 Under the regulations, HRA is required in respect of both 'plans' and 'projects'. Where a project is subject to assessment, there is generally sufficiently detailed *project specific* information against which to make a comprehensive assessment. A plan based assessment is different; in most cases a plan is a strategic level document setting out broad intentions and

[1] The Conservation of Habitats and Species Regulations 2017 SI No 1012 (replacing the 2010 Regulations and coming into force on 30th November 2017)
[2] Refer regulation 63

often lacking the project or spatially specific details which may not be developed until after the plan has been published. Indeed, it is the plan itself which frequently steers the detail of the projects which it envisages. As such the HRA of a 'plan' is recognised to require a different approach to that of a 'project'.

1.2.3 In the case of the EC v UK[3] the European Court of Justice (the ECJ) required the UK Government to secure the assessment of Britain's land use plans under the provisions of the Habitats Directive. In that judgment the Advocate General, and the Court itself, recognised that the assessment of plans had to be tailored to the stage in plan making.

1.2.4 The Advocate General's opinion[4] which informed the judgment of the court acknowledged the difficulties associated with an assessment of a plan. In paragraph 49 of her opinion Advocate General Kokott stated that adverse effects:

> '...*must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure*.'

Consistently, in the UK High Court case of Feeney[5] the judge said:

> '*Each appropriate assessment must be commensurate to the relative precision of the plans at any particular stage and no more. There does have to be an appropriate assessment at the* [plan] *stage, but such an assessment cannot do more than the level of detail of the* [plan] *at that stage permits.*'

1.2.5 In undertaking plan based HRAs, it is therefore important to get the balance right; too severe an approach may be excessive. Caution is required, even adopting a precautionary approach, not to assign a 'likely significant effect' to policies and proposals that could not, realistically, have such an effect, because of their general nature. It is important to apply the precautionary principle in the 'likely significant effect test' in the Regulations, but the European Commission in its own guidance on the application of the test[6], accepts that policies in a plan that are no more than general policy statements or which express the general political will of an authority cannot be likely to have a significant effect on a site.

1.2.6 Too lenient a view however can be equally problematic. In the EC v UK, the ECJ found that it was the requirement to determine planning applications in accordance with the development plan (unless material considerations indicate otherwise) that made Britain's land use plans capable of significantly affecting European sites.

[3] Case C-6/04: Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland judgment of the Court 20 October 2005.

[4] Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland

[5] Sean Feeney v Oxford City Council and the Secretary of State CLG para 92 of the judgment dated 24 October 2011 Case No CO/3797/2011, Neutral Citation [2011] EWHC 2699 Admin

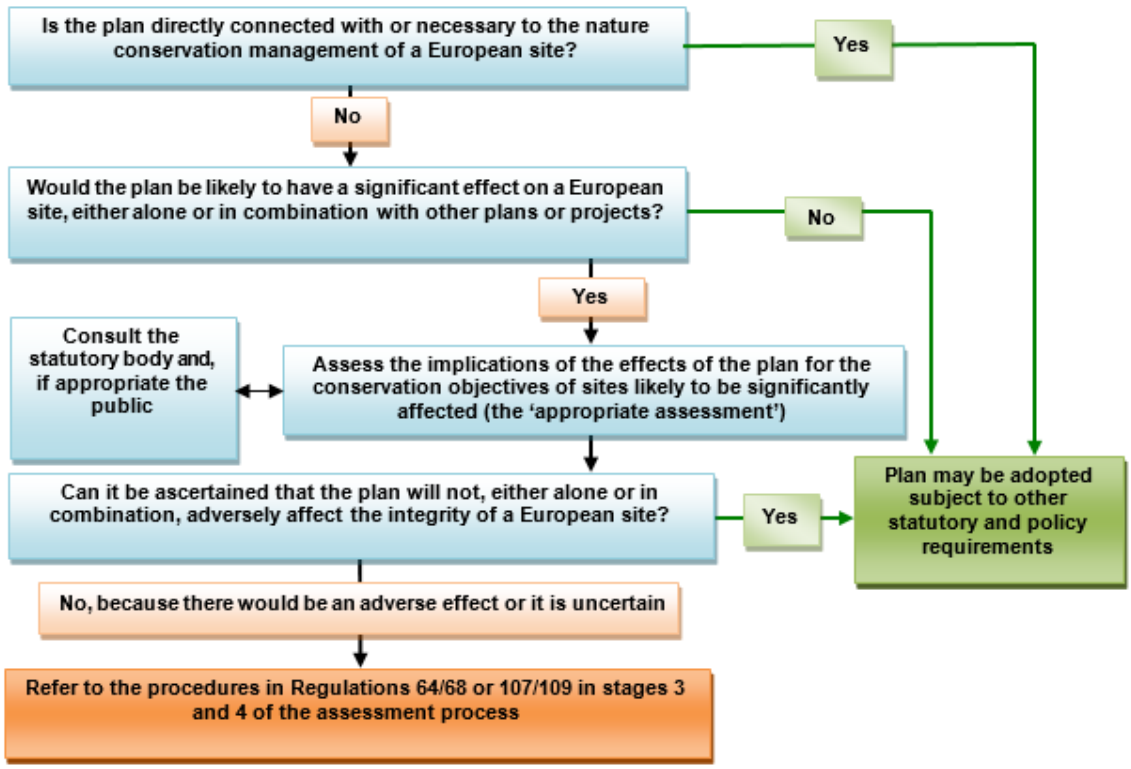
[6] European Commission, 2000, *Managing Natura 2000 Sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC* section 4.3.2 at http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf

## 1.3 The HRA approach

1.3.1 This HRA follows the guidance set out in *The Habitats Regulations Assessment Handbook*[7] (hereafter referred to as 'The HRA Handbook'). Current subscribers to the Handbook include Natural Resources Wales and the Planning Inspectorate. The 'Practical Guidance for the Assessment of Plans under the Regulations' contained in Part F is considered to represent best practice as it is accepted by both these bodies as appropriate for their own staff to follow.

1.3.2 The process and method of assessment is summarised in the following three diagrams which are taken from the HRA Handbook. Figure 1.1 illustrates the statutory procedures required by the regulations. Figure 1.2 is an outline of the four stage approach to the HRA of plans; this report represents stages 1 and 2 in the diagram. Figure 1.3 illustrates how the HRA process is integrated into the plan making process.

**Figure 1.1: Procedures required by regulations 63 and 105 of the Habitats Regulations**




[7] Tyldesley, D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook,* November 2017 edition UK: DTA Publications Ltd.

**Figure 1.2**

**Outline of the four stage approach to the assessment of plans under the Habitats Regulations**

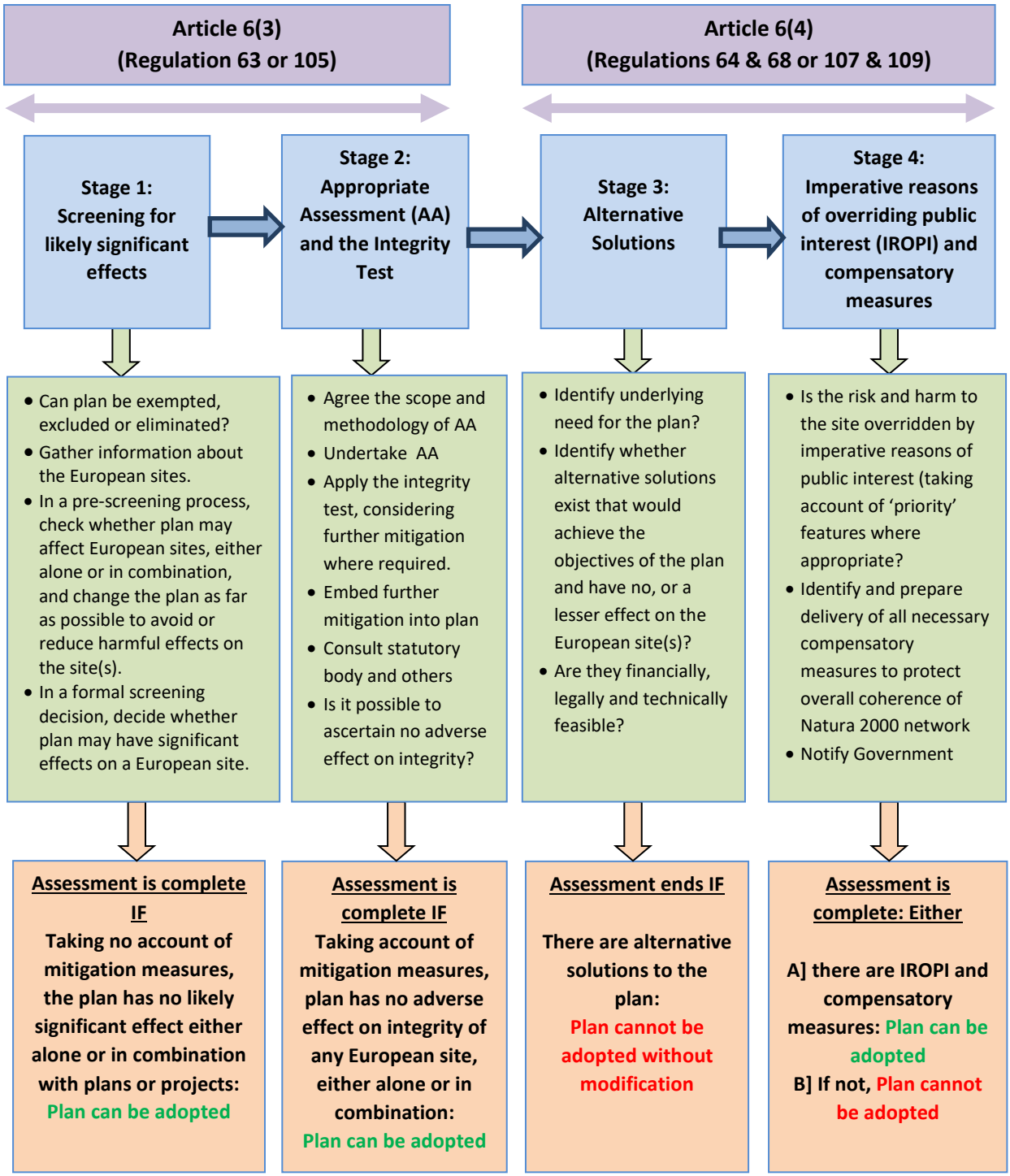
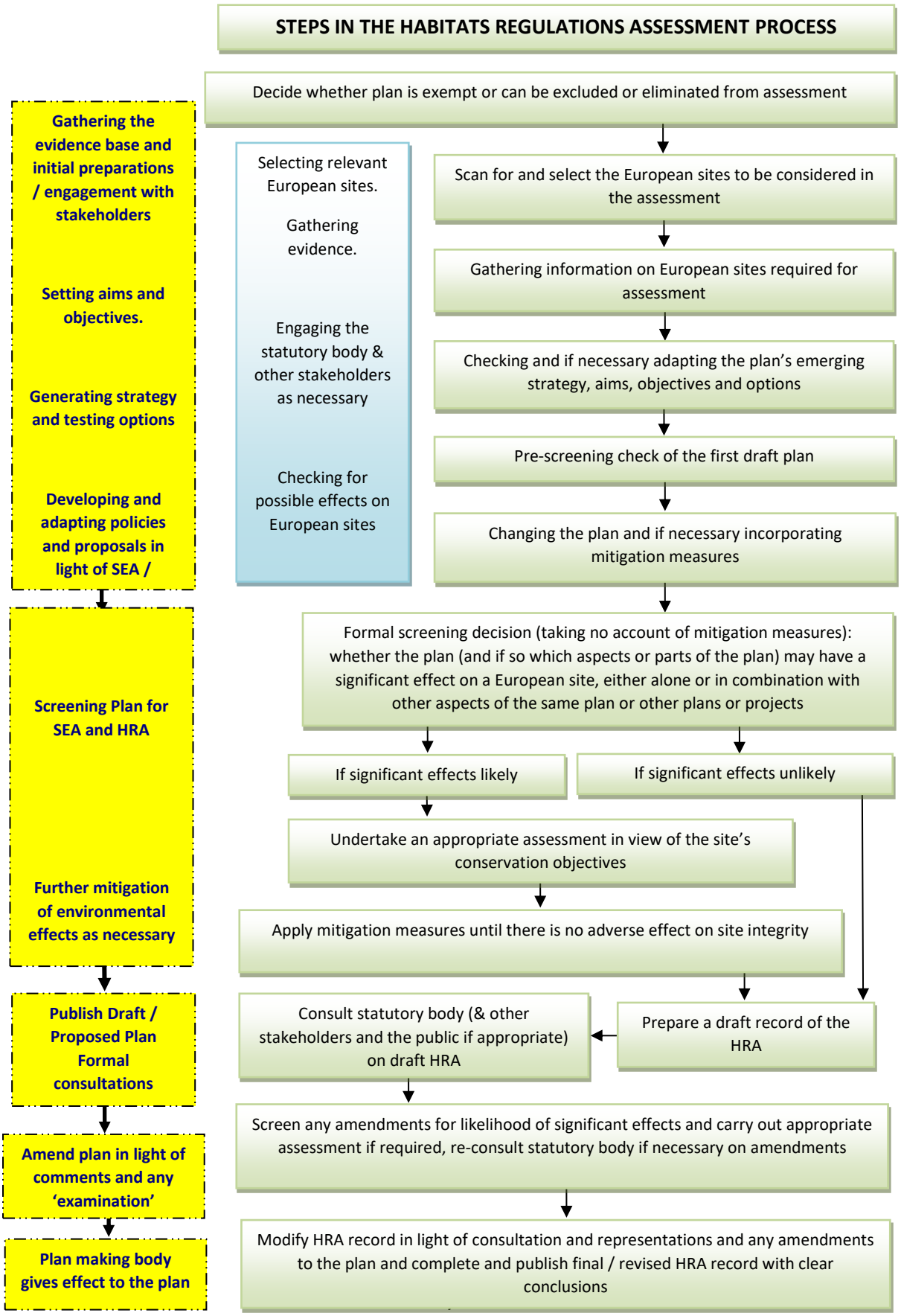


**Figure 1.3: Relationship of steps in the Habitats Regulations Assessment with a typical plan making process**



## 1.4 The *People Over Wind* ruling and plan HRA

1.4.1 In April 2018 the CJEU handed down their judgment in the case of ***People Over Wind***[8]. This ruling has clarified that it is not appropriate, when screening a plan or project for likely significant effects, to take account of 'measures intended to avoid or reduce harmful effects on a European site'. Where such measures are relied upon to avoid identified risks of harmful impacts to a European site, the plan or project should be progressed through to an appropriate assessment at which stage mitigation measures can be taken into account.

1.4.2 The implications of the ***People Over Wind*** decision for plan HRA were taken into account as part of the updates to the methodological guidance in the Habitats Regulations Assessment Handbook (refer 1.3) which were published in November 2018. The approach recommended in the Handbook, and applied here, is based on the use of screening categories and a new category was added (category 'M') to identify any measures within a plan which are *intended* to avoid or reduce harmful effects to a European site.

1.4.3 It is important not to ascribe *any* safeguarding or protective policy to category 'M'; the new category is intended to assist users with the identification of plan policies whose purpose and intention is to avoid actual harm to European sites (as was the case in the ***People Over Wind*** decision). Examples of policies which should correctly be assigned to category 'M' include policies to implement strategic approaches to address risks from recreational pressure or nutrients associated with the overall scale or quantum of development allocated within a plan. In addition, policies to implement strategic approaches for bat SACs (often with supporting supplementary planning guidance documents) which are clearly identified as necessary to avoid or reduce harm.

1.4.4 Some plans include plan wide safeguarding policies which may refer to the requirements of the Habitats Regulations, in a general manner, but are not included in response to any actual identified risk to any particular site. Such policies are helpful in providing a safeguard in respect of other plan policies which are not geographically specific but which, theoretically, *could* result in a risk to a European site *if*, for instance, they were to be implemented within the boundary of a site. It is usually clear that the risks associated with such policies are purely theoretical but the general plan wide policies highlighting the protection afforded to European sites are helpful in ensuring that those theoretical risks do not arise (and these general safeguarding policies can usefully be referred to in screening out such hypothetical risks). Assigning such policies to category 'M' would be disproportionate as they are not included in response to any identifiable actual harm (or risk of harm) to a European site they are standard biodiversity policies which are included in most plans and can be screened out under category 'D' as a general plan-wide environmental safeguarding policy.

1.4.5 Having said that, a general plan-wide policy cannot form a mitigation measure which might be relied upon to avoid or reduce harm to a European site where it directly conflicts with another policy (which clearly represents risks of damage to a site). Consequently, policies or proposals which have a potential for significant adverse effects on individial European sites should be removed from the plan, or policy-specific, or proposal-specific, mitigation measures must be introduced to the plan (and screened accordingly under the new 'category 'M'). Any tension in the plan must be resolved in favour of protecting the European sites from harm which may be caused by the effects of the policies or proposals in the plan. A bespoke site or case specific policy qualifying a particular proposal in the plan would be permissible, because

[8] Case C-323/17 People Over Wind v Coillte Teoranta, 12th April 2018.

it would refer to specific details of future particular development[9]. There is nothing wrong in adopting something in principle which may not happen in the future if the condition or qualification is not satisfied[10].

## 1.5 Scope of this assessment

1.5.1 This report is a *shadow* Habitats Regulations Assessment as required under regulation 63 of the Habitats Regulations. It is the responsibility of SNPA as the competent authority to apply the specific legal tests and make the formal decisions which are required to be taken. This report sets out advice to SNPA as to how a Habitats Regulations Assessment of the Management Plan might be completed. SNPA, as the competent authority, are then able to adopt the conclusions and findings set out in this report, should they consider it appropriate to do so.

[9] Feeney paragraphs 88, 90 and 92. See also Cairngorms Campaign [2012] CSOH 153 (para 139)
[10] Feeney paragraph 96. See also Cairngorms Campaign [2012] CSOH 153 (para 138)

# 2 Identification of European sites potentially affected

## 2.1 Scanning and site selection

2.1.1 Twenty sites are initially identified for screening. The European sites for which effects which are considered to represent a credible risk, and which should therefore be considered as part of the preliminary screening, are those summarised in table 2.1 below.

**Table 2.1: Sites which are identified as relevant to the HRA**

| Site Name | | SAC | SPA | Ramsar |
|---|---|---|---|---|
| 1 | Aber Dyfi / Dyfi Estuary | | ✓ | |
| 2 | Afon Dyfrdwy a Llyn Tegid / River Dee and Bala Lake | ✓ | | ✓ |
| 3 | Afon Eden -Cors Goch Trawsfynydd | ✓ | | |
| 4 | Afon Gwyrfai and Llyn Cwellyn / River Gwyrfai and Llyn Cwellyn | ✓ | | |
| 5 | Berwyn | | ✓ | |
| 6 | Berwyn a Mynyddoedd de Clwyd / Berwyn and South Clwyd Mountains | ✓ | | |
| 7 | Cadair Idris | ✓ | | |
| 8 | Coedydd Aber | ✓ | | |
| 9 | Coedydd Derw a Safleodd Ystlumod Meirion / Meirionnydd Oakwoods and Bat Sites | ✓ | | |
| 10 | Cors Fochno* | ✓ | | ✓ |
| 11 | Corsydd Eifionydd* | ✓ | | |
| 12 | Craig yr Aderyn / Bird's Rock | | ✓ | |
| 13 | Eryri / Snowdonia | ✓ | | |
| 14 | Glynllifon* | ✓ | | |
| 15 | Llyn Idwal | | | ✓ |
| 16 | Migneint-Arenig-Dduallt | ✓ | ✓ | |
| 17 | Morfa Harlech a Morfa Dyffryn | ✓ | | |
| 18 | Mwyngloddiau Fforest Gwydir / Gwydyr Forest Mines | ✓ | | |
| 19 | Pen Llyn a'r Sarnau / Lleyn Peninsula and the Sarnau | ✓ | | |
| 20 | Rhinog | ✓ | | |

**Sites in close proximity to the park boundary but not within the national park themselves*

2.1.2 Information on the sites and their qualifying features together with links to their corresponding conservation objectives can be found within Appendix 1.

2.1.3 Having identified the sites that are within (or adjacent) to the Plan area, the next step is to identify the potential impact mechanisms through which the Plan might exert an influence over the sites identified, and hence identify which of the 20 sites need to be subject to further assessment in respect of which potential effect mechanisms. This is of particular importance where, as is the case here, a large number of sites have been identified within the Plan area. Part F.4.2 of the HRA Handbook recognises:

> *'…scanning for relevant sites potentially affected (and then selecting those which will need to be considered in respect of the plan's effects) is not always a straightforward process. It is important to ensure all sites potentially adversely affected are considered to a sufficient degree, but it is equally important to avoid unnecessary or excessive data gathering about sites that would either not be affected at all, or in*

*respect of which there are only theoretical risks. This will help to keep the assessment proportional to the residual risk of significant effects.*

2.1.4 The HRA Handbook continues:

> *'It is acknowledged that in plan assessment or in considering options at an early stage the scanning and selection process may need to be quite 'coarse grained', due to the lack of information about the precise nature of what may be proposed in the plan and how it might affect the qualifying features.*
>
> *As a general guide, and subject to case-by-case analysis by an ecological adviser, as necessary, the sites described in the Scanning and Site Selection List in Figure F.4.4 at the end of this section, are likely to be relevant. In almost all cases a scan of such sites will enable an appropriate 'short-list' of sites potentially affected to be drawn up, from which the final list of sites to be included in the assessment can be selected after considering the relevant information. Selection of the sites is an iterative process, considering and reconsidering information and effects as understanding and information improve, until there is a satisfactory degree of confidence that all sites potentially adversely affected have been selected….'*
>
> *… If there is no causal connection or link between the plan's proposals and the site's qualifying features there cannot be an effect. If there is a 'theoretical' pathway, or 'hypothetical' cause, but in practice there is no credible evidence of a real rather than a hypothetical link to the site, it cannot be regarded as being potentially significant, either alone or in combination with other plans or projects. There is no point including that supposition in further assessment.'*

2.1.5 It is therefore important, before embarking on a detailed assessment of all 20 sites listed above, to identify those sites where there is credible evidence of a real risk sites from the adoption of the Plan as currently drafted. Whilst there are many European sites within the Plan area, it may be fairly straightforward to exclude sites based on a common sense approach which recognises the credible evidence for real risks which are likely to arise in view of the sensitivity of the site and its qualifying features. This will help to focus later steps in the assessment and minimise unnecessary assessment effort.

2.1.6 Table 2.3 below is a completed 'scanning and site selection' list referred to in the extract of the HRA Handbook quoted above (figure F.4.4 of the Handbook) to inform this sifting process.

**Table 2.3: Scanning and site selection list**

| Types of plan | Sites to scan for and check | Names of sites selected |
|---|---|---|
| 1. All plans (terrestrial, coastal and marine) | Sites within the geographic area covered by or intended to be relevant to the plan | All sites listed in table 2.1 with the exception of 10, 11 and 14. |
| 2. Plans that could affect the aquatic environment | Sites upstream or downstream of the plan area in the case of river or estuary sites | N/A (not an effect anticipated to arise from the plan) |
| | Open water, peatland, fen, marsh and other wetland sites with relevant hydrological links to land within the plan area, irrespective of distance from the plan area | N/A (not an effect anticipated to arise from the plan) |

| Table 2.3: Scanning and site selection list | | |
|---|---|---|
| **Types of plan** | **Sites to scan for and check** | **Names of sites selected** |
| 3. Plans that could affect the marine environment | Sites that could be affected by changes in water quality, currents or flows; or effects on the inter-tidal or sub-tidal areas or the sea bed, or marine species | N/A (effects on marine processes not anticipated to arise from the plan) |
| 4. Plans that could affect the coast | Sites in the same coastal 'cell', or part of the same coastal ecosystem, or where there are interrelationships with or between different physical coastal processes | N/A (no coastal process effects anticipated to arise from the plan) |
| 5. Plans that could affect mobile species | Sites whose qualifying features include mobile species which may be affected by the plan irrespective of the location of the plan's proposals or whether the species would be in or out of the site when they might be affected | Sites 1, 2, 3, 4, 5, 9, 11, 12, 14, 16, 18 |
| 6. Plans that could increase recreational pressure on European sites potentially vulnerable or sensitive to such pressure | Such European sites in the plan area | All sites listed in table 2.1 - Whilst the plan will not lead to development the management of the site might influence current recreational usage patterns. The potential for effects will therefore be considered. |
| | Such European sites within an agreed zone of influence or other reasonable and evidence-based travel distance of the plan area boundaries that may be affected by local recreational or other visitor pressure from within the plan area | |
| | Such European sites within an agreed zone of influence or other evidence-based longer travel distance of the plan area, which are major (regional or national) visitor attractions such as European sites which are National Nature Reserves where public visiting is promoted, sites in National Parks, coastal sites and sites in other major tourist or visitor destinations | |
| 7. Plans that would increase the amount of development | Sites in the plan area or beyond that are used for, or could be affected by, water abstraction irrespective of distance from the plan area | N/A (plan does not provide for provision of housing or other development hence not an effect anticipated to arise from the plan) |
| | Sites used for, or could be affected by, discharge of effluent from waste water treatment works or other waste management streams serving the plan area, irrespective of distance from the plan area | |
| | Sites that could be affected by the provision of new or extended transport or other infrastructure | |
| | Sites that could be affected by increased deposition of air pollutants arising from the proposals, including emissions from significant increases in traffic | |

| Table 2.3: Scanning and site selection list | | |
|---|---|---|
| **Types of plan** | **Sites to scan for and check** | **Names of sites selected** |
| 8. Plans for linear developments or infrastructure | Sites within a specified distance from the centre line of the proposed route (or alternative routes), the distance may be varied for differing types of site / qualifying features and in the absence of established good practice standards, distance(s) to be agreed by the statutory nature conservation body | N/A (not an effect anticipated to arise from the plan) |
| 9. Plans that introduce new activities or new uses into the marine, coastal or terrestrial environment | Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the new activities proposed by the plan | N/A (no such 'new' uses introduced by the Plan) |
| 10. Plans that could change the nature, area, extent, intensity, density, timing or scale of existing activities or uses | Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the changes to existing activities proposed by the plan | N/A (existing recreational usage patterns are covered by 6 above) |
| 11. Plans that could change the quantity, quality, timing, treatment or mitigation of emissions or discharges to air, water or soil | Sites considered to have qualifying features potentially vulnerable or sensitive to the changes in emissions or discharges that could arise as a result of the plan | N/A (not an effect anticipated to arise from the plan) |
| 12. Plans that could change the quantity, volume, timing, rate, or other characteristics of biological resources harvested, extracted or consumed | Sites whose qualifying features include the biological resources which the plan may affect, or whose qualifying features depend on the biological resources which the plan may affect, for example as prey species or supporting habitat or which may be disturbed by the harvesting, extraction or consumption | N/A (not an effect anticipated to arise from the plan) |
| 13. Plans that could change the quantity, volume, timing, rate, or other characteristics of physical resources extracted or consumed | Sites whose qualifying features rely on the non-biological resources which the plan may affect, for example, as habitat or a physical environment on which habitat may develop or which may be disturbed by the extraction or consumption | N/A (not an effect anticipated to arise from the plan) |
| 14. Plans which could introduce or increase, or alter the timing, nature or location of disturbance to species | Sites whose qualifying features are considered to be potentially sensitive to disturbance, for example as a result of noise, activity or movement, or the presence of disturbing features that could be brought about by the plan | N/A (disturbance from recreational usage patterns are covered by 6 above) |
| 15. Plans which could introduce or increase or change the timing, nature or location of light or noise pollution | Sites whose qualifying features are considered to be potentially sensitive to the effects of changes in light or noise that could be brought about by the plan | light disturbance potentially relevant to site 9, 14 and 18 due to bat qualifying species |

| Table 2.3: Scanning and site selection list | | |
|---|---|---|
| **Types of plan** | **Sites to scan for and check** | **Names of sites selected** |
| 16. Plans which could introduce or increase a potential cause of mortality of species | Sites whose qualifying features are considered to be potentially sensitive to the source of new or increased mortality that could be brought about by the plan | N/A (not an effect anticipated to arise from the plan) |

2.1.7 The scanning and site selection table has identified six potential mechanisms through which the Plan might exert an influence over European sites which are summarised below.

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

# 3 Screening the Plan for a likelihood of significant effects

## 3.1 An introduction to screening

3.1.1 Having identified the sites which might potentially be affected by aspects of the Management Plan Document, the first stage in the HRA process is commonly referred to as the 'screening' stage.

3.1.2 'Screening' is not a term used in the Directive or Regulations but is widely used for convenience to describe the first step of the HRA process. The purpose of the screening stage is to consider each aspect of the Plan and identify whether it is:

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

3.1.3 For aspects of the Plan which are subject to assessment, the screening test requires a decision to be made as to whether that aspect of the Plan has a 'likely significant effect, either alone or in combination with other plans and projects', or not.

3.1.4 The HRA Handbook contains further guidance regarding this practical interpretation of this step, with reference to case law and government guidance. Section C.7.1 sets out a series of principles relevant to the screening decision; key extracts are set out below:

- *As a result of European case law in Waddenzee, irrespective of the normal English meaning of 'likely', in this statutory context a 'likely significant effect' is a possible significant effect; one whose occurrence cannot be excluded on the basis of objective information. In this context it is permissible to ask whether a plan or project 'may have a significant effect'…*(principle 3)
- *A significant effect is any effect that would undermine the conservation objectives for a European site…* (principle 4)
- *An effect which would not be significant can properly be described as : as 'insignificant effect'; or a 'deminimis effect; or a 'trivial effect'; or as having 'no appreciable effect'; but it is important to bear in mind that, in this context, all the terms are synonymous and are being used to describe effects which would not undermine the conservation objectives'….*(principle 8)
- *'Objective', in this context, means clear verifiable fact rather than subjective opinion. It will not normally be sufficient for an applicant merely to assert that the plan or project*

*will not have an adverse effect on a site, nor will it be appropriate for a competent authority to rely on reassurances based on supposition or speculation. On the other hand, there should be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine the site's conservation objectives. Any serious possibility of a risk that the conservation objectives might be undermined should trigger an 'appropriate assessment'* (principle 11).

## 3.2 Screening the introductory sections

3.2.1 The introductory sections of the Management Plan are entirely comprised of introductory text and contextual information. These parts of the document are factual and not proposing any change *per se,* and cannot conceivably have any effects on a European site and are screened out of further assessment.

**Table 3.1: Screening introductory sections of the Plan**

| Element of the Plan | Assessment and reasoning | Screening conclusion |
|---|---|---|
| **Why we need a Plan and how it can be used** | Background information | Screened out |
| **What makes Snowdonia special** | Introductory / contextual information | Screened out |
| **Our long term vision for Snowdonia** | General statement of policy | Screened out |

## 3.3 Screening the Plan outcomes and underpinning policies

3.3.1 The Management Plan then continues in subsequent chapters to set out 13 detailed outcomes with supporting policies. In accordance with the approach adopted for this assessment (refer 1.3 above) a list of 'screening categories' have been used to provide a rigorous and transparent approach to the screening process. These categories are taken from Part F of the HRA Handbook and are as follows:

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

L. Policy or proposal which might be likely to have a significant effect in combination (screened in after the in combination test).
M. Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in

## 3.4 Screening conclusions

3.4.1 All 'policies' under each 'outcome' were screened against these categories; detailed policy based conclusions are provided in Appendix 1.

3.4.2 Having screened the plan policies against the screening categories from the HRA Handbook all policies have been screened out of the need for further assessment with the exception of policy B2.1. The spatial specificity of this action is such that it would not be appropriate to rely on the protection for European sites highlighted by A2.5, which refers to plan wide protection afforded to designated sites generally. Taken together therefore, policies B2.1 and A2.5 risk creating an internal conflict within the plan which must be resolved in favour of protecting European sites. B2.1 is therefore taken forward to an appropriate assessment.

3.4.3 A summary of the screening conclusions is presented in table 3.2 below.

**Table 3.2: Summary of screening conclusions from Appendix 1**

| Screening category | Policies screened |
|---|---|
| A. General statement of policy / general aspiration (screened out). | A1.2, A1.4, A3.3, A6.3, A7.1, A7.2, B1.2, B2.2, B4.1, B5.2, B5.3, C2.1, C2.2, C2.3, C3.2 and C3.3 |
| B. Policy listing general criteria for testing the acceptability / sustainability of proposals (screened out). | A7.3 |
| D. Plan-wide environmental protection / site safeguarding policy (screened out | A2.5 and A7.4 |
| E. Policies or proposals which steer change in such a way as to protect European sites from adverse effects (screened out | A1.5, A2.1, A2.2, A2.3, A2.4, A3.1, A3.2, A4.2 and A4.3 |
| F. Policy that cannot lead to development or other change (screened out | B1.3, B3.3, C1.1, C1.2, C1.3, C3.1, C4.1 and C4.2 |
| G. Policy or proposal that could not have any conceivable effect on a site (screened out). | A1.1, A1.3, A4.1, A5.1, A5.2, A5.3, A6.1, A6.2, A7.5, B1.1, B2.3, B4.2 and B5.1 |
| H. Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects) (screened out). | A1.2, A1.4, A3.3, A6.3, A7.3, B1.2, B2.2, B4.1, B5.2, C2.1, C2.2 and C2.3 |
| I. Policy or proposal which may have a significant effect on a site alone (screened in) | B2.1 |

3.4.4 The high number of policies screened out is unsurprising given the nature and purpose of the plan itself. The plan concerns the management of the national park and, given the wide responsibilities and duties which apply to a national park, it is anticipated that a

management plan will generally be concerned with activities which are positive or neutral in terms of conserving and enhancing the natural beauty, wildlife and cultural heritage features.

3.4.5 In addition many of the outcomes and associated policies are high level strategic aims which lack geographic specificity. It is therefore not possible to identify how the implementation of the policies at a plan wide level might reasonably generate risks to individual European sites. In this regard it is important that the plan includes policy A2.5 which explicitly highlights the protection afforded to designated sites by the relevant legislative frameworks which apply.

3.4.6 Policy A2.5 is not included in the plan in response to any identified inherent risks to any particular designated site, it is not therefore a 'mitigation measure' or a '*measure intended to avoid or reduce harm to a European site'* in the context of *People Over Wind* (refer 1.4). Instead it provides the necessary recognition of the protection afforded to such sites in a manner which ensures that any attempts to implement any strategic plan wide outcomes and policies, over the entire plan period, in a manner which doesn't satisfy the underpinning legislative frameworks for designated sites would not be consistent with the plan.

# 4 Appropriate Assessment

## 4.1 The appropriate assessment and applying the integrity test

4.1.1 The purpose of an appropriate assessment is to ensure that, prior to the plan being implemented, a judgment can be made as to whether it can be ascertained that the plan would have no adverse effect on the integrity of any European sites (the integrity test).

4.1.2 Policy B2.1 promotes the development and maintenance of well-marked long distance trails, accessible trails, multi user trails, promoted routes and links and loops between town and villages. The supporting actions include the following text:

> *'Based on results, create a map plan for the development of trails, including exploring options across the National Park in areas such as Bala-Traws, Bala-Dolgellau and identify how access for disabled people can be improved at the most popular sites within the National Park.'*

4.1.3 The explicit reference to possible Bala-Traws and Bala-Dolgellau routes sets this policy apart from other, generic plan wide policies as it implies support (in principle) to geographically specific proposals. Figure 3.4.1 below shows the location of these places in relation to designated European sites.

*Location of Bala relative to Trawsfynydd and Dolgellau*

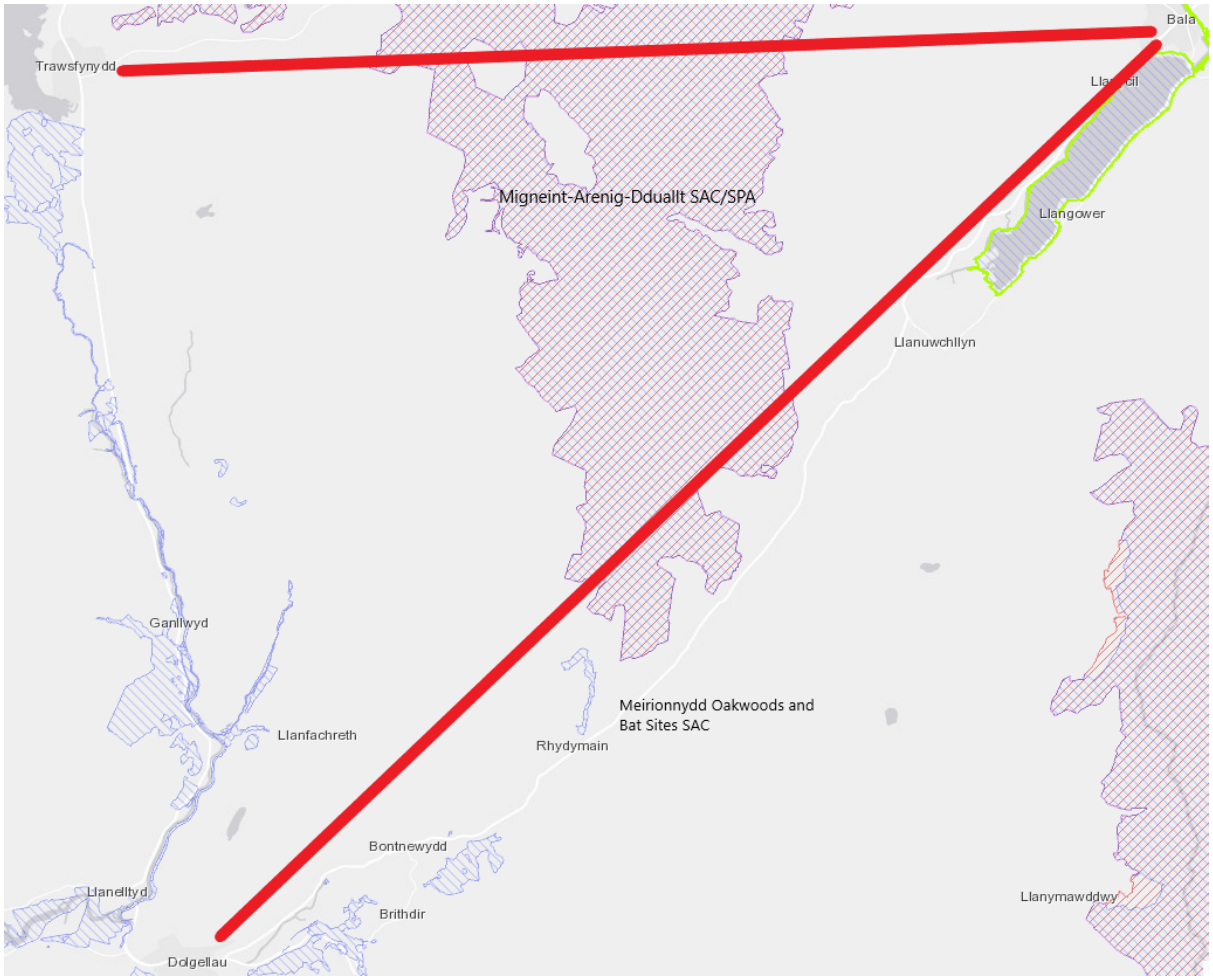



Fig 3.4.1 Newport Parrog Scheme © OpenStreetMap contributors

4.1.4 It is clear that either of these routes will need to cross the Migneint-Arenig-Dduallt SAC/SPA and the Bala - Dolgellau route may also traverse (or pass close to) the Meirionnydd Oakwoods and Bat Sites SAC. In principle therefore B2.1 promotes the provision of trails across a designated SAC /SPA habitat.

4.1.5 The management plan for Migneint-Arenig-Dduallt SAC/SPA notes that certain areas of the SAC, such as the summit of Arenig Fawr (one of the most visited parts of the site) are particularly vulnerable. Arenig Fawr summit is located just to the north of a linear route route from Bala and Trawsfynydd so it is certainly possible that the creation of a new access route would include the summit further increasing pressure here.

4.1.6 Recreational access is noted as a reason (amongst others) for the unfavourable conservation status of blanket bog. The management plan notes a lack of mature veteran trees and dead wood, which is attributed to past management, and goes on to identify the importance of not allowing plans and projects which result in the removal of veteran trees of dead wood including those connected to recreational access. The manner in which any new access route is planned with therefore need to ensure no removal of veteran trees and dead wood.

4.1.7 The management plan for the Meirionnydd Oakwoods and Bat Sites SAC also includes a management requirement in respect of the protection of mature trees which reads as follows '*Retain mature/veteran trees and ensure plans and projects (such as access and recreation with the associated health and safety requirements or power lines and development) do not indirectly threaten their long-term survival*.'

4.1.8 The challenge with undertaking an appropriate assessment in respect of policy B2.1 is that the plan simply refers to these routes by way of example. The plan does not provide any consent or permission to implement the necessary management actions to deliver a new trail between either Bala-Traws or Bala-Dolgellau.

4.1.9 When considering the potential risks from B2.1 to European sites it is perfectly reasonable to anticipate that such routes *could* be delivered in a manner which avoids adverse effects to site integrity. Deletion of the policy would therefore be excessive and disproportionate. However the absence of any proposed route maps or further detail concerning *when* or *how* such routes might be delivered means that it is not possible to address these potential risks which might arise in a specific manner at this time. This scenario is recognised and specifically addressed in section F.10.1.4 of the HRA Handbook which is specific to plan HRA and reads as follows (emphasis added):

> ***'F.10.1.4 Case-specific policy caveats***
>
> *Where the effects of a policy depend on how it is implemented in due course, through the development management process, there may be a possibility that if implemented in one or more particular ways, the policy could have a significant effect on a European site. Such policies cannot therefore be 'screened out' in stage 1; and in the appropriate assessment the uncertainty of the policy outcome will remain unless it can be removed by an amendment to the plan.*
>
> *In order for the plan-making body to be able to ascertain with confidence that the policy or proposal would not have an adverse effect on the integrity of a European site, it will be necessary to ensure that implementing the policy in ways that would affect the integrity of a European site would not be in accordance with the development plan. The plan-making body is likely to have to add a specific caveat.*

*Plan-making bodies should not rely merely on a general policy in the plan aimed at protecting European sites. If one aspect of a plan would be likely to have a significant effect on a European site, it is not appropriate to ascertain that there would not be an adverse effect on site integrity because there is another general policy saying that such sites would be protected. The inherent tension, conflict, or contradiction between the two aspects of the plan must be resolved in favour of the protection of the European site, by enabling the plan-making body to ascertain that there would not be an adverse effect on the integrity of the European site, with the appropriate degree of certainty.*

*Two examples of a case-specific policy caveat*

*'To be in accordance with this development plan, and for permission to be granted, detailed proposals, including applications for outline planning permission, for the [specified development] must demonstrate that [the specific aspects of the development that raise concerns in the appropriate assessment] would not adversely affect the integrity of the [specified European site(s)] either alone or in combination with other plans or projects'.*

*'With regard to any proposed development at [location], development proposals will only be in accordance with this plan and will only be granted permission if there would be no adverse effect on the integrity of [specified European site(s)], either alone or in combination with other plans or projects.'*

*An added caveat must be site and case-specific and explicit. It should say that development would not be in accordance with the plan if it cannot be ascertained that it would not have an adverse effect on the integrity of the specific European site. It should be added to the policy, not merely to the explanatory text.'*

4.1.10 It is therefore proposed that, in order to address the potential risks which might arise from B2.1 the methodology within the HRA handbook would support the inclusion of a case specific policy caveat. It will be for SNPA to finalise the wording but, given that A2.5 explicitly sets out the need to comply with relevant decision making frameworks which apply in respect of designated sites, the suggested wording change below might reasonably be incorporated into bullet point 5:

*'Based on the results, create a map plan for the development of trails, including exploring options across the National Park in areas such as Bala-Traws, Bala – Dolgellau (subject to compliance with policy A2.5) and identify how access for disabled people can be improved at the most popular sites within the National Park*

4.1.11 The insertion of this additional case specific policy caveat makes it clear that any new trails which do not comply with A2.5 would not be compliant with the management plan as written, in spite of the explicit reference to potential development of Bala-Traws and/or Bala – Dolgellau trails. This ensures that any tension between the protection highlighted in A2.5 and the implicit support for development of Bala-Traws and Bala – Dolgellau trails will be resolved in favour of protection for the European sites. The integrity of the European sites potentially affected is secured by the inclusion of this caveat.

| Table 4.1: Applying the integrity test to the new policy B2.1 with suggested caveat included | | |
|---|---|---|
| | **Policy** | **Integrity test conclusion and justification** |
| B2.1 | Create a plan and focus resources on promoting, developing and maintaining well-marked long distance trails, accessible trails, multi user trails (particularly cycling trails and mountain bike routes), promoted routes and links and loops between towns and villages.<br>➢ Identify the target audiences for routes and trails in line with policy B1.1<br>➢ Review the Recreation Strategy for the National Park and ensure that it delivers on Outcome B2 and includes national standards for signage, furniture and accessibility<br>➢ Increase the total length of accessible trails by removing barriers to enable access for all wherever possible, and provide least restrictive options in relation to furniture<br>➢ Survey local people, stakeholders and visitors to assess their needs and demands in relation to access in their local area, along with any barriers they face to accessing the outdoors<br>➢ Based on the results, create a map plan for the development of trails, including exploring options across the National Park in areas such as Bala-Traws, Bala - Dolgellau (subject to compliance with policy A2.5) and identify how access for disabled people can be improved at the most popular sites within the National Park<br>➢ Identify and pursue funding to deliver on the plan | **No adverse effect on integrity.** The inclusion of the additional wording at bullet point 5 of the overview of actions ensures that policy B2.1 will have no adverse effect on the integrity of any European sites potentially affected by any trails linking Bala-Traws or Bala – Dolgellau. |

4.1.12 In assessing the potential impacts associated with B2.1, it is also important to recognise the status of the National Park itself. In carrying out its statutory duties, SNPA must have regard to their statutory responsibilities and management role as a National Park Authority. The Environment Act 1995 establishes two statutory purposes for National Parks in England and Wales which provide an over-arching umbrella under which all other responsibilities are delivered[11]. These are to:

a) Conserve and enhance the natural beauty, wildlife and cultural heritage

b) Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public

Any irreconcilable conflict in respect of these two purposes should be resolved in favour of the purpose to conserve and enhance the natural beauty, wildlife and cultural heritage[12]. As

[11] Refer Section 61 of the Environment Act 1995

[12] Refer section 62 (11A(2)) of the Environment Act 1995

a National Park authority SNPA should also seek to foster the economic and social well-being of local communities within the Park in pursuance of these two purposes[13].

4.1.13 The National Park is a heavily managed resource. Authority staff are familiar with balancing the enjoyment of the Park by visitors with the overarching purpose to protect and conserve the special features of the Park. **The level of involvement by Park Authority staff with the way that the Park is utilised, together with their experience in managing visitor pressure provides the objective information upon which effects which might otherwise undermine the conservation objectives for a European site (and hence be 'significant') can be excluded. There is no credible evidence of a real risk from policy B2.1 in light of the protection afforded through A2.5.**

4.1.14 With the inclusion of the case specific policy caveat, it is possible to conclude that B2.1 will have no adverse effect on the integrity of any European site.

4.1.15 **It is therefore the conclusion of this HRA that, with reference to the proposed case specific policy caveat, and on the assumption that it is incorporated into any final version of the plan, the management plan will have no adverse effect on the integrity of any European sites.**

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

4.2.1 Following initial screening, with the exception of B2.1 all policies were screened out against categories which conclude no likely significant effect either alone or in combinations. This is on the basis that the policies will have no effects (or no conceivable effects) *at all* and such policies cannot therefore act in combination with other plans and projects meaning no in combination assessment work is required.

4.2.2 As recognised at section 1.2 above, the inherent nature of a plan will necessarily limit the extent to which its effects can be subject to assessment under the Habitats Regulations. In this regard, the Advocate General's opinion in case C-6/04[14] acknowledged the difficulties associated with an assessment of a plan. In paragraph 49 of her opinion Advocate General Kokott stated that adverse effects:

> '*...must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure*.'

Consistently, in the UK High Court case of Feeney[15] the judge said:

> '*Each appropriate assessment must be commensurate to the relative precision of the plans at any particular stage and no more. There does have to be an appropriate assessment at the Core Strategy stage, but such an assessment cannot do more than the level of detail of the strategy at that stage permits.*'

4.2.3 This assessment has identified the potential for adverse effects from policy B2.1. Following an appropriate assessment it has been concluded that, on the basis of the incorporated

[13] Refer section 62 (11A(1)) of the Environment Act 1995

[14] Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland

[15] Sean Feeney v Oxford City Council and the Secretary of State CLG para 92 of the judgment dated 24 October 2011 Case No CO/3797/2011, Neutral Citation [2011] EWHC 2699 Admin

mitigation measure of the addition of a case specific policy caveat the draft management plan will have no adverse effect on the integrity of any European sites.

4.2.4 At the current time, the only geographically specific element of the plan which might represent a risk to a European site is policy B2.1. The case specific policy caveat provides the necessary confidence that the implementation of the plan will not result in an adverse effect on site integrity but no details are currently available concerning the route any hypothetical trail between Bala-Traws or Bala – Dolgellau might take. Indeed as the routes are referred to only by way of example it is perfectly reasonable to anticipate that these trails may never actually be delivered. There is no timeframe within which any proposed new trail may come forwards and the potential for in combination effects to arise with other plans and projects cannot reasonably be subject to any meaningful assessment at this stage. Without a clear route or timeframe it is not possible to identify the potential effects upon any European sites which might, hypothetically arise, in the absence of any such risks it is not possible to identify *what* other plans and projects may even have the potential to act in combination.

4.2.5 Policy A2.5 explicitly requires assessment 'either alone or in combination with other plans and projects' as such the potential for in combination effects will be subject to assessment as necessary *if* and when any proposals come forwards under the plan which might have a likely significant effect on a European site. On the basis of the precision of the plan at this stage, in the absence of any information as to where within the park potentially damaging proposals might come forwards, in combination effects are taken into account and excluded on the basis of insufficient information and a lack of credibility as to any real risks. The requirement for any proposed scheme to be subject to assessment alone or in combination prior to implementation means that in combination effects will be subject to assessment at a later stage, when sufficient detail is available to enable the assessment to be undertaken in a meaningful manner.

# 5 Conclusions

## 5.1 Overall conclusion

5.1.1 The draft management plan has been subject to screening under the Habitats Regulations. The management plan has been considered in respect of the potential for likely significant effects upon any European site from the document, either alone or in combination with other plans and projects.

5.1.2 Following a preliminary screening, all aspects of the plan were screened as having no likely significant effect, either alone or in combination with the exception of policy B2.1, which was identified as having a potential likely significant effect 'alone'. The inclusion of an case specific policy caveat was identified as a 'mitigation measures' and, once included, it was possible to conclude that the amended policy A2.1 would have no adverse effect on the integrity of any European sites.

5.1.3 This outcome is not surprising given:

- The statutory purpose of the National Park and its Management Plan
- The statutory obligations of the National Park Authority
- The exceptionally high development management standards applied by the National Park Authority

# Appendix 1: Screening of outcomes and associated policies

| No | Policy | Screening category | Comment/justification | Further work? |
|---|---|---|---|---|
| ***A1 Any negative impacts of recreational activities on the National Park are being reduced*** | | | | |
| A1.1 | Develop guiding principles and thresholds in relation to visitor impacts on the environment and landscape. The principles will define when further action in the form of an areas based management plan is required. | G | **Screened out:** This policy will not have any conceivable impact upon any European sites as it merely seeks to develop broad guiding principles. | N |
| A1.2 | Ensure that uplands paths are well maintained to manage the impacts of erosion and prioritise work based on the number of footpath users. | A/H | **Screened out:** This is a general statement of policy. It implies support for path maintenance and may be a driver for change but is not spatially specific. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy A1.2 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| A1.3 | Take pragmatic action to reduce litter. | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| A1.4 | Reduce the impacts of parking and transport on the environment and landscape | A/H | **Screened out:** This is a general statement of policy. It implies support for alternative parking options and may be a driver for change but is not spatially specific and provides no detail as to what such alternatives might be. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy A1.4 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| A1.5 | Reduce any negative impacts of recreational activities. | E | **Screened out:** This will actively deliver benefits which reduce recreational pressure which will be a positive step for European sites. | N |
| ***A2: Biodiversity is being maintained and enhanced, whilst the resilience of ecosystems is increased.*** | | | | |
| A2.1 | Co-ordinate an ambitious public goods scheme that focuses on maintaining, restoring and expanding habitats, species, historic environment features and wider public goods. | E | **Screened out:** This will actively deliver benefits and will be a positive step for European sites. | N |

| No | Policy | Screening category | Comment/justification | Further work? |
|---|---|---|---|---|
| A2.2 | Biodiversity decline is being addressed through maintenance, restoration, expansion and connectivity activities. | E | **Screened out:** This will actively deliver benefits and will be a positive step for European sites. | N |
| A2.3 | Ensure that water quality and the marine environment are maintained and enhanced | E | **Screened out:** This will actively deliver benefits and will be a positive step for European sites. | N |
| A2.4 | Restore, expand and improve the resilience and species mixture of native tree species and woodlands | E | **Screened out:** This will actively deliver benefits and will be a positive step for European sites. | N |
| A2.5 | Ensure that any management related proposals have no adverse effect on the integrity of European site(s), special interest features of SSSIs, and protected features of other areas. | D | **Screened out:** This is a plan wide safe guarding policy explicitly highlighting policy protection for designated sites in general. The protection is highlighted in respect of all elements of the management plan. N.B. Please refer section 1.4 with regards compliance with *People Over Wind*. | N |
| ***A3: We are prepared for the impacts of climate change and are reducing our carbon footprint.*** | | | | |
| A3.1 | Reduce the carbon emissions of Snowdonia National Park | E | **Screened out:** This will actively deliver benefits and will be a positive step for European sites. | N |
| A3.2 | Safeguard and increase the amount of carbon stored in Snowdonia | E | **Screened out:** This will actively deliver benefits and will be a positive step for European sites. | N |
| A3.3 | Implement climate change mitigation measures | A/H | **Screened out:** This is a general statement of policy. It implies support for maintenance of upland paths and may be a driver for change but is not spatially specific and provides no detail as to what such works might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy A3.3 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| ***A4: Snowdonia is at the forefront internationally in successfully tackling invasive species, pests and diseases that impact on native species*** | | | | |
| A4.1 | Raise awareness with the public on how they can take action to prevent the establishment and spread of invasive species | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| A4.2 | Continue to expand current Partnership actions to control and reduce the extent of invasive species | E | **Screened out:** This will actively deliver benefits and will be a positive step for European sites. | N |
| A4.3 | Expand on actions to tackle pests and diseases that impact on native species | E | **Screened out:** This will actively deliver benefits and will be a positive step for European sites. | N |
| ***A5: Communities, businesses and visitors play an active role in caring for the National Park's landscapes, habitats, wildlife and cultural heritage*** | | | | |
| A5.1 | Seek opportunities for local communities, schools, hard to reach and disadvantaged groups to engage with, and | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |

| No | Policy | Screening category | Comment/justification | Further work? |
|---|---|---|---|---|
| | learn about, Eryri's environment and cultural heritage, and how they can help care for it. | | | |
| A5.2 | Support, promote and deliver volunteering opportunities that help protect and enhance the environment and cultural heritage | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| A5.3 | Deliver measures under Outcome B3 that - through information, marketing and branding - further engage stakeholders in caring for the National Parks' environment. | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| ***A6: Snowdonia is a leading example in Wales of how to care for and champion cultural heritage and the historic environment*** | | | | |
| A6.1 | Support the repair and restoration of listed buildings | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| A6.2 | Support owners of Scheduled Ancient Monuments to better safeguard them | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| A6.3 | Develop and implement landscape scale projects which benefit the historic environment | A/H | **Screened out:** This is a general statement of policy regarding the historic environment. It implies support for landscape scale projects and may be a driver for change but is not spatially specific and provides no detail as to what such projects might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy A6.3 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| ***A7: Our Special Qualities are well protected*** | | | | |
| A7.1 | Through the Local Development Plan improve the appropriate setting and location of development in the landscape | A | **Screened out:** This is a general statement of policy | N |
| A7.2 | Through the Local Development Plan, ensure that major new developments safeguard views into and out of the National Park | A | **Screened out:** This is a general statement of policy | N |
| A7.3 | The Local Development Plan contains clear guidance for inappropriate major infrastructure development such as above ground power cables within the boundary, and where possible encourages the undergrounding of inappropriately located existing lines | B/H | **Screened out:** This is a policy listing general criteria for testing the acceptability of proposals regarding major infrastructure development. It encourages the undergrounding of existing lower lines which may be a driver for change but is not spatially specific and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy A7.3 cannot | N |

| No | Policy | Screening category | Comment/justification | Further work? |
|---|---|---|---|---|
| | | | undermine the conservation objectives of any European sites identified in the scanning and site selection table. | |
| A7.4 | Through the Local Development Plan, ensure that lighting in new developments takes account of the International Dark Sky Reserve status and Protect and enhance Regionally Important Geological and Geomorphic Sites (RIGS) and general geodiversity | D | **Screened out:** This is an environmental protection policy to take account of the dark skies reserve status | N |
| A7.5 | Encourage reductions in the number of low flying activities taking place over Snowdonia | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | |
| ***B1: The National Park is having a positive impact on the well-being of our nation*** | | | | |
| B1.1 | Expand work with partners, health services and Public Service Boards through social prescribing schemes | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| B1.2 | Promote and enable a diverse range of activities that improve people's well-being | A/H | **Screened out:** This is a general statement of policy relevant to well-being but it implies support for access provision to inland waters for water based activities which may be a driver for change. It is not spatially specific however and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy B1.2 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| B1.3 | Plan a community – based project exploring the long, reciprocal relationship between the people of Eryri and the land | F | **Screened out:** This policy cannot lead to any development or change | N |
| ***B2: Residents and visitors can access a variety of routes in the National Park aimed to improve physical and mental health*** | | | | |
| B2.1 | Create a plan and focus resources on promoting, developing and maintaining well-marked long distance trails, accessible trails, multi user trails (particularly cycling trails and mountain bike routes), promoted routes and links and loops between towns and villages | I | **Screened in:** This is a general statement of policy relevant to access but it implies support for the promotion and development of access proposals which may be a driver for change. However it explicitly includes reference to exploring options in areas including Bala – Traws and Bala – Dolgellau and any such routes are highly likely to traverse the Migneint-Arenig-Dduallt SAC. Reliance on the protection afforded to the SAC referred to in policy A2.5 merely risks creating an internal conflict with the plan. Policy B2.1 is therefore likely to have a significant effect upon the Migneint-Arenig-Dduallt SAC. | Y |
| B2.2 | Ensure that Right of Way work is effectively prioritised and that responsibilities and standards are clear, with | A/H | **Screened out:** This is a general statement of policy relevant to access but it implies support for the prioritisation of access proposals which may be a | N |

| No | Policy | Screening category | Comment/justification | Further work? |
|---|---|---|---|---|
| | the SNPA focusing its resources and funding on multi-user trails and upland paths | | driver for change. It is not spatially specific however and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy B2.2 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | |
| B2.3 | Improve access opportunities for disabled people and socially excluded groups | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| ***B3: Our Special Qualities are widely recognised to explain the importance of Snowdonia National Park.*** | | | | |
| B3.1 | Develop a brand marketing strategy for Snowdonia based on the Special Qualities that is consistently implemented across the public and private sector | F | **Screened out:** This policy cannot lead to any development or change | N |
| B3.2 | Encourage visitors to come at different times of year and to different areas in order to ease pressure during the peak season and help businesses with seasonality issues | A/H | **Screened out:** This is a general statement of policy relevant to visitor access but it implies support for influencing current usage patterns which may be a driver for change. It is not spatially specific however and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy B3.2 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| B3.3 | Using the brand marketing strategy as a foundation, develop a shared plan with partners on the information we provide to visitors, with an emphasis on the Special Qualities and behavioural change. | F | **Screened out:** This policy cannot lead to any development or change | N |
| ***B4: Sustainable options for parking and transport are achieved*** | | | | |
| B4.1 | Improve the sustainability and availability of transport for visitors and residents and address parking problems | A/H | **Screened out:** This is a general statement of policy relevant to parking and transport but it implies support for proposals relating to temporary parking and links between public transport and trails. It is not spatially specific however and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy B4.1 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| B4.2 | Explore and implement opportunities to encourage greener transport | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| ***B5: Our visitor facilities are high quality and landscape sensitive*** | | | | |

| No | Policy | Screening category | Comment/justification | Further work? |
|---|---|---|---|---|
| B5.1 | Visitor facilities are sufficiently funded and invested in to achieve and exceed the expectations of visitors | G | **Screened out:** This policy will not have any conceivable impact upon any European sites | N |
| B5.2 | Support activities that complement the Special Qualities of Snowdonia - in particular tranquillity - and that encourage visitors to switch to visiting during the autumn and winter in order to address seasonality and pressures in high season | A/H | **Screened out:** This is a general statement of policy relevant to visitor activities but it implies support for influencing current usage patterns which may be a driver for change. It is not spatially specific however and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy B5.2 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| B5.3 | High quality, landscape appropriate accommodation, meets the expectations and demand of visitors and is helping increase spend per head | A | **Screened out:** This is a general statement of policy | N |
| ***C1: The language, culture and heritage of Snowdonia is being celebrated, supported and strengthened*** | | | | |
| C1.1 | Promote understanding, enjoyment and protection of the Welsh language and culture | F | **Screened out:** This policy cannot lead to any development or change | N |
| C1.2 | Provide opportunities for Welsh learners in the area | F | **Screened out:** This policy cannot lead to any development or change | N |
| C1.3 | Protect Welsh place names | F | **Screened out:** This policy cannot lead to any development or change | N |
| ***C2: Jobs and opportunities encourage people to settle in the area*** | | | | |
| C2.1 | Communication infrastructure in the area is being improved for businesses and communities in a way that does not compromise the landscape | A/H | **Screened out:** This is a general statement of policy relevant to communication infrastructure but it implies support for new proposals and initiatives which may be a driver for change. It is not spatially specific however and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy C2.1 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| C2.2 | Support and promote training, employment and business opportunities related to - or complementing - the National Parks 1st purpose and Special Qualities including environment related sectors | A/H | **Screened out:** This is a general statement of policy relevant to employment and business opportunities but it implies support for projects which may be a driver for change. It is not spatially specific however and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy C2.2 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | N |
| C2.3 | Support and promote training, employment and business opportunities relating or complementing the | A/H | **Screened out:** This is a general statement of policy relevant to employment and business opportunities but it implies support for projects which may be | N |

| No | Policy | Screening category | Comment/justification | Further work? |
|---|---|---|---|---|
| | National Park's second purpose and Special Qualities, and the health and well-being theme | | a driver for change. It is not spatially specific however and provides no detail as to what such proposals might involve. In view of the protection afforded to European sites having been highlighted by policy A2.5, policy C2.3 cannot undermine the conservation objectives of any European sites identified in the scanning and site selection table. | |
| ***C3: We are implementing solutions for affordable housing to buy and rent*** | | | | |
| C3.1 | Work with partners to address underlying issues and develop innovative solutions to delivering affordable housing that meets local needs | F | **Screened out:** This policy cannot lead to any development or change | N |
| C3.2 | Through the LDP create policies that encourage affordable housing | A | **Screened out:** This is a general statement of policy | N |
| C3.3 | Through the LDP create policies that encourage sustainable homes | A | **Screened out:** This is a general statement of policy | N |
| ***C4: Local communities are supported to thrive in all aspects of well-being*** | | | | |
| C4.1 | Increase opportunities for dialogue between the National Park and community based organisations | F | **Screened out:** This policy cannot lead to any development or change | N |
| C4.2 | Work with communities to further enhance understanding of the Special Qualities of the National Park | F | **Screened out:** This policy cannot lead to any development or change | N |

# Appendix 2: Sites and their qualifying features

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| 1 | **Aber Dyfi / Dyfi Estuary SPA**<br>The Dyfi Estuary is located on the west coast of Wales on the boundary between Ceredigion, Gwynedd and Powys. The SPA comprises the estuary, with adjoining saltmarsh, marshy grassland and improved grassland. The estuarine complex is of outstanding physiographic interest. It includes sandbanks, mud-flats, saltmarsh, peatbogs, river channels and creeks, with an extensive sand dune complex across the mouth of the estuary. The estuary itself is a feature of the Penllyn a'r Sarnau marine SAC. The site is of importance as a traditional wintering area for Greenland White-fronted Goose Anser albifrons flavirostris – the most southerly regularly used area for this population in the UK. Until the early 1980s the geese roosted on the estuary and flew inland either to the Cambrian mountains or to the raised bog of Cors Fochno to feed. The geese now use the saltmarsh and grasslands for feeding and roost on the sandbanks and mud-flats. | Greenland White-fronted Goose *Anser albifrons flavirostri* | Click here |
| 2 | **Afon Dyfrdwy a Llyn Tegid / River Dee and Bala Lake SAC/Ramsar**<br>The source of the River Dee lies within the Snowdonia National Park and its catchment contains a wide spectrum of landscapes from high mountains around Bala, steep-sided wooded valleys, near Llangollen, to the rich agricultural plains of Cheshire and north Shropshire and the vast mudflats of the estuary.<br><br>The course and topography of the River Dee and its tributaries were strongly influenced and modified during the last Ice Age. The underlying geology of the Dee ranges from impermeable Cambrian and Ordovician shales in the west, through Silurian to Carboniferous Limestone outcrop at Llangollen to Coal Measures and thick boulder clay overlying the Triassic sandstones of the Lower Dee valley. | **SAC features**<br>Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation<br>Atlantic salmon *Salmo salar*<br>Floating water-plantain *Luronium natans*<br>Sea lamprey *Petromyzon marinus*<br>Brook lamprey *Lampetra planeri*<br>River Lamprey *Lampetra fluviatilis*<br>Bullhead *Cottus gobio*<br>European otter *Lutra lutra* | Click here |

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | The site extends from the western extremity of Llyn Tegid taking in the entire lake and its banks to its outfall into the River Dee. It then takes in the river and its banks downstream to where it joins the Dee Estuary SSSI. A number of the Dee's tributaries are also included, these being the Ceiriog, Meloch, Tryweryn, and Mynach. In its swifter upper reaches, the Dee flows through the broad valley near Corwen, and the spectacular Vale of Llangollen before entering the Cheshire plain at Erbistock where it meanders northwards through the Cheshire plain to Chester. Below Chester Weir, the river is largely Estuarine in character. However there is a tidal influence as far upstream as Farndon, as high tides regularly exceed the weir's height. In its slower, more mature reaches the river is characteristic of a floodplain river with meanders, oxbows and other river-formed landscape features. | **Ramsar features**<br>The lake and aquatic / emergent vegetation<br>Lake fen /swamp inc. wet woodland.<br>Fish. *Coregonus lavaretus* Gwyniad.<br>Invertebrate. *Myxas glutinosa* Glutinous snail<br>Nationally important species. *Luronium natans* Floating waterplantain | |
| 3 | **Afon Eden -Cors Goch Trawsfynydd SAC**<br>The Afon Eden/River Eden is a relatively unmodified river, mainly upland in character, of approximately 10km length. The watershed begins just south of Llyn Trawsfynydd, within an area of gently sloping and poorly drained land. The upper section of the catchment is slow-flowing with a number of deep pools along its length. In the lower two-thirds of the catchment the river flows more steeply into a narrow rocky gorge, with an adjacent area of forestry plantation, known as Coed y Brenin. The Afon Eden joins with the Afon Mawddach, just above the village of Ganllwyd, but the SAC boundary continues downstream to the tidal limit of the Mawddach at Llanelltyd. The Afon Eden is fed by a number of base-poor upland streams, which flow from the eastern flanks of the Rhinog mountains. The Ardudwy leat takes the most acidic waters from the eastern tributaries to Llyn Trawsfynydd. This water is used to maximise the water available for HEP generation by the Maentwrog Power Station.<br><br>The area receives high average rainfall, which has contributed to the development of raised bogs, blanket bog, and transition mires and quaking bogs. Two areas of raised bog occur at the top end of the catchment, close to the watershed, where they were | **SAC features**<br>Floating water-plantain *Luronium natans*<br>Freshwater pearl mussel *Margaritifera margaritifera*<br>Active raised bog<br>Atlantic salmon *Salmo salar*<br>Otter *Lutra lutra*<br>Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles | Click here |

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | once part of a much larger extent of bog, much of which is now flooded by Llyn Trawsfynydd. Transition mires and quaking bogs occur in waterlogged situations where they receive nutrients from the surrounding catchment as well as from rainfall. They are located within the wetlands surrounding the areas of raised bog.<br><br>The ecological structure and functions of the site are dependent on hydrological and geomorphological processes (often referred to as hydromorphological processes), the quality of riparian habitats and connectivity of habitats. Animals that are highly mobile such as migratory fish and otters, are also affected by factors operating outside the site.<br><br>The river contains the last known population of freshwater pearl mussels surviving in Wales, they are almost entirely confined to one section of the river. Historically the mussels were more widespread in the catchment. The mussels rely on salmonid parr hosting, for a short period of time, the glochidial larvae of the mussels on their gills, so the success of migratory and spawning fish in the catchment is crucial to their long term survival. Atlantic salmon is also an important fish species that breeds in the Mawddach catchment.<br><br>In the slow moving waters just upstream from Pont y Grible is a population of floating water plantain. | | |
| 4 | **Afon Gwyrfai and Llyn Cwellyn / River Gwyrfai and Llyn Cwellyn SAC**<br>This site comprises the Afon Gwyrfai and Llyn Cwellyn. The Gwyrfai flows out of Llyn y Gader near Rhyd Ddu and passes through Llyn Cwellyn on its way to the sea at Y Foryd, Caernarfon Bay. It also includes a tributary of the Gwyrfai, the Afon Treweunydd, and the small lake it flows from on the slopes of Snowdon. Sporadically throughout it's course, the SAC is abutted by semi-natural wetland riparian habitat much of which is within the SSSI. | **SAC features**<br>Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and /or of the *Isoteo-Nanojuncetea*<br>Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation | Click here |

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | Llyn Cwellyn has long been recognised for its conservation importance and is an excellent example of a deep (maximum depth of 37m, average depth of 23m) oligotrophic lake formed during the last Ice Age. Its nutrient–poor waters support a range of typical macrophytes, and one of the best populations of floating water plantain in the UK.<br><br>The whole of the Gwyrfai river system is of outstanding ecological quality. The river is particularly noted for its excellent salmon population, for which it is considered to be one of the best supporting rivers in the United Kingdom. It is also notable for its otter population which occur here in good numbers because of the relative naturalness of its riparian habitats and the abundance of undisturbed dense cover. In addition to the lake, the river supports a discrete community of floating water plantain, and water-crowfoot Ranunculus spp, with other associated vegetation including bryophyte assemblages occurring in various sectors of the river. | Atlantic salmon *Salmo salar*<br>Floating water-plantain *Luronium natans*<br>European otter *Lutra lutra* | |
| 5/6 | **Berwyn SPA/ Berwyn a Mynyddoedd de Clwyd / Berwyn and South Clwyd Mountains SAC**<br>The Berwyn and South Clwyd Mountains SAC is a large upland site (27,132 ha), the largest area of blanket bog and European dry heath in Wales. It comprises three discrete sites, Berwyn SSSI, Llandegla Moor SSSI and Ruabon and Llantysilio Mountains and Minera SSSI. All of these sites are predominantly a mixture of dry heath and blanket bog vegetation with patches of transition mires and quaking bogs vegetation found as an intricate mosaic, usually on acidic rock types, and can together be described as upland moorland.<br><br>Berwyn supports the most extensive tract of near-natural blanket bog in Wales. Much of the blanket bog vegetation is dominated by NVC type M19 *Calluna vulgaris–Eriophorum vaginatum* blanket mire, with crowberry *Empetrum nigrum* and an often extensive hypnoid moss cover; within this community cloudberry *Rubus chamaemorus* is found close to the southernmost limit of its British range. On deeper peats, there are smaller stands of M18 Erica *tetralix–Sphagnum papillosum* mire, some of which exhibit | **SAC features**<br>Blanket bogs *Priority feature<br>European dry heaths<br>Semi-natural dry grasslands and scrubland facies: on calcareous substrates *(Festuco-Brometalia)*<br>Transition mires and quaking bogs<br>Calcareous and calcshist screes of the montane to alpine levels (*Thlaspietea rotundifolii)*<br>Calcareous rocky slopes with chasmophytic vegetation<br><br>**SPA features**<br>Hen harrier *Circus cyaneus* | Click here |

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | distinctive surface patterning. The mire vegetation shows transitions to heather-dominated dwarf-shrub heath.<br><br>Berwyn contains the largest stands of upland European dry heath in Wales. The dry heath is characteristic of Berwyn's more easterly location and less oceanic climate than the other major Welsh uplands, and consists principally of NVC type H12 *Calluna vulgaris–Vaccinium myrtillus* heath, with frequent crowberry *Empetrum nigrum* and occasional cowberry *Vaccinium vitis-idaea*. Other heath vegetation present includes areas of H18 *Vaccinium myrtillus–Deschampsia flexuosa* heath and in some areas stands of damp H21 *Calluna vulgaris–Vaccinium myrtillus–Sphagnum capillifolium* heath. These latter heaths occur in an intermediate position between the drier heaths and blanket mire and support occasional plants of lesser *twayblade Listera cordata*.<br><br>Berwyn is the most important upland in Wales for breeding birds. It supports a wide range of species including internationally significant numbers of hen harrier *Circus cyaneus*, merlin Falco *columbarius*, peregrine Falco *peregrinus* and red kite *Milvus milvus*, as well as significant proportions of the Welsh populations of other species including short eared owl *Asio flammeus*, golden plover *Pluvialis apricaria*, red grouse *Lagopus lagopus* and black grouse *Tetrao tetrix.* | Merlin *Falco columbarius*<br>Peregrine *Falco peregrinus*<br>Red kite *Milvus milvus* | |
| 7 | **Cadair Idris SAC**<br>The site is located to the south of Dolgellau and is of special interest for its biological, Ordovician/igneous bedrock geology and Pleistocene/Quaternary geomorphology features.<br><br>Cadair Idris SAC is underpinned by Cadair Idris SSSI. The woodlands on the northern edge of the SSSI form part of Coedydd Derw a Safleoedd Ystlumod Meirion SAC and are not covered by this plan. The site encompasses Cadair Idris mountain and the lower slopes, which are a mosaic of broadleaved woodland, wet meadows, upland habitats | **SAC features**<br>Oligotrophic to mesotrophic standing waters<br>Siliceous scree<br>Calcareous rocky slopes with chasmophytic vegetation<br>Siliceous rocky slopes with chasmophytic vegetation.<br>Hydrophilous tall herb fringe communities | Click here |

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | and grassland. It is a truly spectacular area with very many habitats and species, which are of national and international importance.<br><br>The broad range of physical conditions gives rise to a wide range of habitat types. These include dwarf scrub heath communities, montane grasslands, herb- and fern-rich communities, blanket mire, soligenous flush communities, a spring-flush habitat, open water and oak woodland. The most prevalent are acid grasslands dominated by *Nardus stricta* and *Festuca ovina* and acid dry heaths dominated by *Calluna vulgaris*. In the context of the SSSI the site is also of special interest for its assemblage of higher plants, lichens, bryophytes and montane invertebrates. Nine higher plants are of special interest in their own right as is the (SAC feature) slender green feather moss *Hamatocaulis vernicosus* and an edge of range lichen species. Also of special interest are populations of the marsh fritillary butterfly, Welsh clearwing moth, and lesser horseshoe bat.<br><br>Cadair Idris SAC includes five oligotrophic lakes, namely Llyn y Gadair, Llyn Gafr, Llyn Arran, Llyn Cyri, and Llyn Cau. The Cadair Idris National Nature Reserve forms an area of approximately 450 hectares in the heart of the site, including Cwm Cau and Penygadair. CCW also own and manage an area of mixed woodland adjacent to the NNR at Ystradlyn, and c81ha of undeclared reserve on the lower north slopes of the site at Tanygader. Cadair Idris is without doubt the walking honey-pot of south Eryri. An estimated 168,000 people visited the NNR in 2007. | European dry heath<br>Northern Atlantic wet heath<br>Blanket bog<br>Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles<br>Molinia meadows<br>Alkaline fens | |
| 8 | **Coedydd Aber SAC**<br>Coedydd Aber extends 4 km along the steep-sides valleys of the Afon Rhaeadr Fawr and Afon Anafon, which are situated immediately south of Abergwyngregyn village.<br><br>The SAC comprises 346.2 hectares and is concurrent with the area of SSSI (with the exception of unit 7 which is SSSI only). Coedydd Aber NNR comprises some 169 hectare of the SAC area. The 4 site lies between 50 metres (at Bont Newydd) and 540 metres (at Marian Rhaeadr Fawr) above sea level. | **SAC features**<br>Old sessile oak woods with *Ilex* and *Blechnum*<br>Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* | Click here |

| Sites which are identified as relevant to the HRA | | | |
|---|---|---|---|
| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | Coedydd Aber is of special interest for its botanical, ornithological and entomological interest. The site supports a mosaic of native broadleaved woodland types of international importance including alluvial forests with alder and ash, and old sessile oak woods, which form a natural elevation – dependent habitat transition from coast to open mountain. The transition zones include stands of mixed oak, ash, alder and birch woodland, some of which can be classed as ancient, open hawthorn scrub, sub-montane heath, cliffs and acidic grassland. The tree dwelling or epiphytic lichen communities that the woodland communities support are also of national importance. The transition from woodland to mountain vegetation is also reflected in the diverse array of bird species assemblages from woodland, through torrent river, woodland edge, ffridd and heath to open species assemblages. The woodland, montane heath and grassland breeding bird assemblages qualify the site. The Afon Rhaeadr Fawr is one of the most precipitous rivers in Britain outside Scotland and is of national importance as a representative of this river type. | | |
| 9 | **Meirionnydd Oakwoods and Bat Sites SAC**<br>The Meirionnydd Oakwoods and Bat Sites SAC is made up of a series of woodlands, stretching from Dolgellau in the south to Eryri in the north. The majority of the SAC is classified as the woodland type known as "Old sessile oak woods with Ilex and Blechnum in the British Isles", which covers approximately 84% of the SAC and is the dominant woodland type at most of the sites. A key feature of European importance is the rich Atlantic bryophyte communities that are often well developed within this Annex I type. These include numerous rare species, such as *Campylopus setifolius*, *Sematophyllum demissum, Adelanthus decipiens, Leptocyphus cuneifolius* and *Plagiochila atlantica*. Another key feature of the Meirionnydd Oakwoods and Bat Sites SAC is the lichen flora which is exceptionally rich and includes numerous rare species such as, *Micarea xanthonica, Parmelinopsis horrescens, Phyllopsora rosei, Micarea stipitata* and *Tyothallia biformigera*. Frequently the oak woodland occurs as part of a mosaic of woodland types including other Annex I Habitats, "Bog woodland", "Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*" and "*Tilio-Acerion forests of slopes,* | Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles<br>Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior Tilio-Acerion* forests of slopes, screes and ravines<br>Bog woodland<br>European dry heath<br>Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation<br>Lesser horseshoe bat *Rhinolophus hipposideros* | Click here |

| Sites which are identified as relevant to the HRA | | | |
|---|---|---|---|
| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | *screes and ravines*" which occur in small areas and are only significant at a few of the component SSSI/units. The transitions between these different woodland types are important in terms of maintaining the structure and function of the habitat type and vary across the U.K.<br><br>The heath is characterised by abundant *Calluna vulgaris, Ulex gallii* and *Erica cinerea* growing on thin, poor acidic soils. There are many small areas of dry heath interspersed amongst the woodland, which have not been measured, but the three largest areas of dry heath, together comprise 1% of the area of the SAC.<br><br>The feature "Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation" occurs within the Afon Glaslyn, within the Glaslyn SSSI and currently outside the SAC but within a proposed extension to the SAC.<br><br>Lesser horseshoe bats have over 20 known roosts within the SAC and forage widely within the SAC's woodlands, associated habitats and the surrounding countryside. The SAC includes maternity roost sites in various types of buildings and structures, and winter hibernation sites, especially in mines. There are other types of roost such as night, transitional, leks and swarming sites, about which very little is known. | | |
| 10 | **Cors Fochno SAC/Ramsar**<br>The peatland complex of Cors Fochno lies on the southern flank of the Afon Dyfi, within the estuarine floodplain. It is a rare and striking landscape feature, and considered to be the 'locus typicus' for estuarine raised mire in the UK. Although reduced in size by drainage and reclamation, the remaining expanse at Borth comprises one of the largest actively growing raised bogs in the lowlands of Britain, and accounts for around 4% (200ha) of the total British resource of primary surface (i.e. uncut) raised mire.<br><br>Cors Fochno is a site of national geological importance containing a 7m deep peat archive, continuously developed over 5000 years and storing information on sea level, climate and other environmental change. This, together with the site being one of only | **SAC features**<br>Active raised bogs * (priority feature)<br>Degraded raised bogs still capable of natural regeneration<br>Depressions on peat substrates of the Rhyncosporion<br><br>**Ramsar feature**<br>Estuarine raised bog | Click here |

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | a handful in the UK considered representative of active northern peatland complexes make the site highly valued for research, particularly relating to climate change. The bog also contains important archaeological remains including the best example of a medieval timber trackway known in Wales.<br><br>The invertebrate assemblages are of great interest and include a wide range of nationally scarce species, such as large heath butterfly Coenonympha tullia, bog bush-cricket Metrioptera bracyptera and small red damselfly Ceriagrion tenellum. The rosy marsh moth Eugraphe subrosea has its major British stronghold here. Also present at its only locality in England and Wales is Heliophanus dampfi, a spider found only on a small number of highest quality raised bogs.<br><br>The site also supports regionally important breeding and wintering bird assemblages. Amongst the former are teal, curlew, grasshopper warbler, skylark and reed bunting, whilst wintering species include hen harrier and merlin. Mammal populations include resident otter. The reptile assemblage includes a strong population of adder | | |
| 11 | **Corsydd Eifionydd SAC**<br>Corsydd Eifionydd SAC is made up of four separate Sites of Special Scientific Interest; Cors Graianog SSSI, Cors Gyfelog SSSI/NNR, Cors Llanllyfni SSSI and Cors y Wlad SSSI. The sites are situated within the upland-fringe transition between Snowdonia and the Llín Peninsula and together they cover an area of over 144 ha. Between them, they should support three features of international importance namely transition mire and quaking bog, marsh fritillary and slender green feather moss. The sites should also support a range of other wetland habitats including marshy grassland, fen, bog, wet woodland and swamp habitats.<br><br>Note: For specific detailed descriptions of each component SSSI, please refer to SSSI citations. | **SAC features**<br>Transition mires and quaking bogs<br>Slender green feather moss *Drepanocladus (Hamatocaulis) vernicosus*<br>Marsh fritillary butterfly *Euphydryas aurinia* | Click here |
| 12 | **Craig yr Aderyn / Bird's Rock SPA** | **SAC features**<br>Chough *Pyrrhocorax pyrrhocorax* | Click here |

| Sites which are identified as relevant to the HRA | | | |
|---|---|---|---|
| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | The high crag of Craig Yr Aderyn, rising from sea level to over 250 metres is a striking landscape feature on the south side of the Dysynni valley. The site is a Special Protection Area because it is an important breeding and roosting site for chough.<br><br>Craig yr Aderyn itself forms the core of a large anticline where Ordovician rock comprising the Craig Cau formation outcrops. These predominantly igneous rocks consist of rhyolitic ashflow tuffs that have in the past been quarried for road stone.<br><br>The crags used to regularly support over 1% of the British population of breeding chough, with five or six pairs nesting in holes and crevices, making this the densest population of breeding chough in the British Isles (six pairs in 0.5Km). However, in recent years breeding numbers have declined to 3-4 pairs. Craig yr Aderyn is also a roost site for chough throughout the year, with non-breeders in the summer and high numbers outside the breeding season. During the period 1991/92-1995/96 the average maximum count was 56, however since then the number of roosting birds has fallen to an average of 18 during the 1999/00-2004/05 period. It has become clear that the birds using Craig yr Aderyn are part of a metapopulation that spend much of the year in south Meirionydd, with the other principle roosting site being at Tonfannau Quarry, 8 kms away, near Tywyn.<br><br>In recent years the origin of individuals using Craig yr Aderyn has been established by tracing colour–ringed chicks. The results to date indicate that the birds using this site were born in Ceredigion and Montgomeryshire and have fledged from nests up to 70kms away. There are only a few records of birds from north Gwynedd. | | |
| 13 | **Eryri / Snowdonia SAC**<br>Eryri comprises three upland massifs separated by roads, the Carneddau, Glyderau and Yr Wyddfa. All three host a number of biological and geological SSSI features and SAC features. The three massifs are divided into land parcels or compartments, most of | **SAC features**<br>Siliceous alpine and boreal grasslands<br>Alpine and Boreal heaths | Click here |

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | which are in private ownership, but some are common land and some are owned by organisations such as the National Trust and power companies.<br><br>Much of Eryri would once have been covered by woodland other than the high ridges and summits. Extensive woodland clearance for agriculture and also quarrying and mining has meant that woodland is now confined to small areas on some of the lower slopes and pockets left in valleys. The resulting vegetation as a result of woodland clearance and the effects of grazing animals is mostly grasslands and heaths with mires and blanket bogs on the deeper peats and on poorly draining ground. A long history of grazing has meant that the rare arctic alpine plants are restricted to the cliffs, ledges and large boulders that are mostly inaccessible to grazing animals.<br><br>Eryri was once grazed by sheep, cattle, ponies and goats. Remaining goats are now confined to feral flocks in areas of Yr Wyddfa and the Glyderau. Cattle are now only rarely used and mountain ponies are confined to the Carneddau. Cattle and ponies are considered beneficial at appropriate stocking levels because they grazed the coarser vegetation which sheep avoid and produce a more varied vegetation structure. Goats in high numbers pose a threat to the more restricted montane vegetation including the rare arctic alpines since they can access ledges and cliffs which the sheep cannot reach.<br><br>Sheep have been the main grazing animals for many years, though cattle were grazed also on many holdings, and stocking rates continued to rise over centuries resulting in the demise of many habitats, including the wet and dry heath and blanket bogs. The result is the rather uniform grassy swards we see today. Damage is particularly evident in the montane heaths that are slow to recover because of their slow growth rates in the extreme conditions they occupy, and in many instances this decline has been exacerbated by recreational pressures and atmospheric pollution. Only recently have the stock numbers begun to decline as a result of management agreements with owners and agri-environment schemes, notably Tir Gofal. Sheep are still the main grazing animal but small numbers of cattle are also kept on some of the holdings and | Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels<br>Calcareous rocky slopes with chasmophytic vegetation<br>Alpine and subalpine calcareous grasslands<br>Siliceous rocky slopes with chasmophytic vegetation<br>Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea*<br>Northern Atlantic wet heaths with *Erica tetralix*<br>European dry heaths<br>Blanket bogs * Priority feature<br>Depressions on peat substrates of the Rhynchosporion<br>Species-rich *Nardus* grassland, on siliceous substrates in mountain areas (and submountain areas in continental Europe) * Priority feature<br>Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles<br>Petrifying springs with tufa formation *(Cratoneurion)* * Priority feature | |

| Sites which are identified as relevant to the HRA | | | |
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| | are beneficial to many of the habitats where they graze the course vegetation which sheep do not touch. Similarly, the feral mountain ponies which roam the Carneddau graze the coarse vegetation and their dung is beneficial to invertebrates and subsequently to chough. | Alkaline fens<br>Alpine pioneer formations of the *Caricion bicoloris-atrofuscae* *<br>Priority feature<br>Floating water-*plantain Luronium natans*<br>Slender green feather-moss *Drepanocladus (Hamatocaulis) vernicosus* | |
| 14 | **Glynllifon SAC**<br>Glynllifon SAC contains maternity roosts at management units 16 (Glynllifon Mansion), 32 (Melin y Cim) and 36 (Pen y Bont), and two hibernation roosts / areas at management units 16 (Glynllifon Mansion) (which is used both as a hibernation and a maternity roost) and 37 (Simdde – dylluan Copper Mine) old mine workings in the Nantlle Valley. In addition areas of habitat surrounding these roosts have been included; a tree lined stream linking management units 32 and 36 (Melin-yCim and Pen y Bont), a large amount of woodland surrounding unit 16 (Glynllifon Mansion) and a small area of hillside unit 37 surrounding the Simdde – dylluan mine levels (Wilkinson, 2006).<br><br>Regular data is collected regarding the number of bats that use each of these roosts. Exit counts are carried out twice a year following the standard lesser horseshoe bat monitoring protocol at all three maternity roosts. A data logger is additionally installed at management unit 16 (Glynllifon Mansion). The data logger records the number of bats exiting and returning to the roost, throughout the year. The data is downloaded and analysed by Peter Andrews (Andrews, 2002, 2004a and 2004b).<br><br>However, there is only limited data for management unit 37 (Simdde – dylluan mine levels), and further survey is required to establish how and when the bats use these mines (Wilkinson, 2006). | **SAC features**<br>Lesser horseshoe bat *Rhinolophus hipposideros* | Click here |

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| | Although some habitat is included within the SAC boundary, the bats use a much wider area for feeding and commuting and there are also known linked roosts outside of the SAC boundary. All these aspects need to be considered when determining the conservation status of the population of lesser horseshoe bats. Radio-tracking work has been undertaken to try to identify the feeding areas and flight lines used. The work was commissioned largely to determine the potential effects of the A487 road scheme. The data needs to be analysed to determine if there are key areas of habitat, flight routes or roosts, which need to be maintained in the landscape in order to support this population of bats. Further research is required to determine how CCW assesses the conservation status of this mobile species (Wilkinson, 2006). | | |
| 15 | **Llyn Idwal Ramsar**<br>Llyn Idwal is a relatively shallow. oligotrophic corrie lake lying at an altitude or 380 m on Ordovician rocks. Its flora is species-rich for a corrie lake, and provides a very good example of an oligotrophic plant community, with almost all the species typical of such waters in Britain being represented. Notable plants include *Elatine hexandra*, *Subularia _aquatica* and *Pilularia globulifera_* which occur respectively in 39, 84 and 71 10 km squares in Britain. The last'mentioned species, although not included in the British Red Data List, is regarded by IUCN as vulnerable in Europe. | Llyn Idwal qualifies for inclusion in the Ramsar list of sites because it is a particularly good example of an oligotrophic upland lake and contains at least one internationally rare plant species. | Click here |
| 16 | **Migneint-Arenig-Dduallt SAC/SPA**<br>Migneint-Arenig-Dduallt is a large upland site that stretches between Ysbyty Ifan and Penmachno in the north down to Rhydymain in the south, and from Trawsfynnydd in the west to just east of Llyn Celyn. It ranges in altitude from 300 m to 712 m. The northern section encompasses a high peatland plateau centred on Migneint and extending to Tomen y Mur in the west and Cwm Hesgyn in the east, with higher points such as Arenig Fach around the rim. The southern section, south of the Afon Lliw, also comprises a high plateau surrounded by higher ground and dominated by Dduallt mountain. The central section, lies south of Cwm Prysor and Llyn Celyn and includes | **SAC features**<br>Blanket bog. *<br>European dry heaths.<br>Northern Atlantic wet heaths with Erica tetralix.<br>Natural dystrophic lakes and ponds.<br>Lakes (Oligotrophic to mesotrophic) standing waters | Click here |

| Sites which are identified as relevant to the HRA | | | |
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| | **Site Name and outline description** | **Qualifying features** | **Link to conservation objectives** |
| | Moel Llyfnant and Moel y Slates as well as the Arenig Fawr mountain ridge which is the highest part of the whole site. The SAC habitats are blanket bog, dry heath, wet heath, lakes and woodland The site is also SPA for its breeding populations of hen harrier *Circus cyaneus*, merlin, *Falco columbarius* and peregrine, *Falco peregrinus*. | Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea<br>Old sessile oak woods with Ilex and Blechnum in the British Isles.<br><br>**SPA features**<br>Hen harrier *Circus cyaneus*<br>Merlin *Falco columbarius*<br>Peregrine *Falco peregrinus* | |
| 17 | **Morfa Harlech a Morfa Dyffryn SAC**<br>The Morfa Harlech a Morfa Dyffryn SAC covers two sand dune systems, Morfa Harlech to the north and Morfa Dyffryn to the south. Morfa Harlech is a rapidly accreting dune systemgaining sand from the coast to the south including the dune system at Morfa Dyffryn, which is eroding. The Morfa Harlech a Morfa Dyffryn SAC supports the following SAC features:<br>• Embryonic shifting dunes<br>• Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes')<br>• Humid dune slacks • Dunes with *Salix repens ssp. argentea (Salicion arinarea)*<br>• Petalwort *Petalophyllum ralfsii*<br><br>The various sand dune communities will through natural processes expand at the expense of others. This may affect the extent of the component SAC features, however, the dynamic processes of the sand dunes and their associated vegetation communities is a valued aspect of the coastal dune systems. The biggest potential conflict is stabilization of dunes and the potential loss of pioneering vegetation communities to fixed dune communities. | **SAC features**<br>Embryonic Shifting Dunes<br>Shifting Dunes along the Shoreline with *Ammophila arenaria* ('white dunes')<br>Humid Dune Slacks<br>Dunes with *Salix repens* ssp. *Argentea (Salicion arinarea)*<br>Petalwort *Petalophyllum ralfsii* | Click here |

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| | Morfa Harlech sand dune system is accreting and is of great importance for its early successional features including its shifting and embryo dunes. The area of dunes away from the beach is very stable with little bare sand.<br><br>The dune slacks at Morfa Harlech vary from drier slacks which grade into fixed dune grasslands to very damp slacks which undergo frequent flooding and support fen type vegetation communities.<br><br>Although *Petalophyllum ralfsii* has been recorded at Morfa Harlech the lack of young slacks in this system means that the species is not abundant.<br><br>Morfa Dyffryn is an eroding system which is highly mobile. A high proportion of the site is made up of bare sand. Shifting dunes extend from the shore right through to the landward boundaries of the dune system and are punctuated by extensive dune slacks. The slack vegetation varies from pioneering embryo slack habitats, successionally young slack communities which support the bulk of the population of *Petalophyllum ralfsii* through to mature, species rich dune slacks. | | |
| 18 | **Mwyngloddiau Fforest Gwydir / Gwydyr Forest Mines SAC**<br>Mwyngloddiau Fforest Gwydir / Gwydyr Forest Mines SAC is located in the Gwydyr Forest between the Conwy and Llugwy valleys north west of Betws y Coed and west of Llanrwst. It comprises scattered areas of mine workings and polluted waste, which have been left behind as a legacy of the lead, zinc and iron mining industry which peaked in the late 1800s in this area. The waste is a hostile environment to most plants, but various metallophytes species have adapted to grow on the metal rich rocks and spoil. The metal rich rocks and spoil fall into the European habitat "*Calaminarian* grasslands of the *Violetalia calaminariae*", which in Europe is characterised by Viola calaminaria. The aforementioned species is not found in the UK, but several of the other associated metallophytes races are found at Mwyngloddiau Fforest Gwydir / Gwydyr Forest Mines SAC, i.e. *Asplenium septentrionale, Ditrichum plumbicola, Thlaspi* | **SAC features**<br>Calaminarian grasslands of the *Violetalia calaminariae*<br>Lesser horseshoe bat *Rhinolophus hipposideros* | Click here |

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| | *caerulescens,* and *Silene vulgaris*. The extensive mine systems beneath the surface provide hibernation roosts to several species of bats, including the lesser horseshoe bat *Rhinolophus hipposideros*. The constant temperature of the deep mines is ideal for hibernating bats and the adjoining habitats are good feeding areas. The mines are too dangerous to explore and map, but the Mwyngloddiau Fforest Gwydir / Gwydyr Forest Mines SAC includes the adit entrances to the mines in order to protect the lesser horseshoe bat. | | |
| 19 | **Pen Llyn a'r Sarnau / Lleyn Peninsula and the Sarnau SAC**<br>The Pen Llŷn a'r Sarnau SAC encompasses areas of sea, coast and estuary that support a wide range of different marine habitats and wildlife, some of which are unique in Wales. The nature of the seabed and coast and the range of environmental conditions present vary throughout the SAC. Differences in rock and sediment type, aspect, sediment movement, exposure to tidal currents and wave action, water clarity and salinity together with biological and food chain interactions have created a wide range of habitats and associated communities of marine plant and animal species. Pen Llŷn a'r Sarnau SAC is a multiple interest site that has been selected for the presence of 9 marine habitat types and associated wildlife (Habitats Directive Annex I habitat types) and 3 mammal species (Habitats Directive Annex II species).<br><br>In places the SAC landward boundary abuts the boundary of SACs encompassing terrestrial / coastal habitats and species and some intertidal areas that are part of the marine SAC have been notified as Sites of Special Scientific Interest (SSSI) (see Annex 3). The Pen Llŷn a'r Sarnau SAC also overlaps wholly or in part with a number of Special Protection Areas (SPA) classified under the Birds Directive: Glannau Aberdaron ac Ynys Enlli SPA, Mynydd Cilan, Trwyn yr Wylfa ac Ynysoedd Sant Tudwal SPA and Dyfi SPA. | **SAC features**<br>Reefs<br>Large shallow inlets and bays<br>Sandbanks which are slightly covered by seawater all the time<br>Estuaries<br>Coastal lagoons<br>Mudflats and sandflats not covered by seawater at low tide<br>Atlantic salt meadows<br>Salicornia and other annuals colonising mud and sand<br>Submerged or partially submerged sea caves<br>Grey seal *Halichoerus grypus*<br>Bottlenose dolphin *Tursiops* truncates<br>Otter *Lutra lutra* | Click here |
| 20 | **Rhinog SAC**<br>The Rhinogydd are carved out of the hard, acidic Cambrian grits of the Harlech dome and have a rugged topography with scattered upland lakes, block-littered slopes, cliffs and outcrops. | **SAC features**<br>European dry heaths<br>Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles<br>Blanket bog * Priority SAC habitat | Click here |

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| | The geographical position of the site imposes an oceanic influence on the climate resulting in high rainfall, moderate temperatures and generally high humidity. The vegetation is dominated by heather *Calluna vulgaris* growing on thin, poor acidic soils. Grazing and burning practices over the past 60 years have been relatively minor and as such the heather stands are deep and mature. This, together with the prevailing climatic conditions, has resulted in a luxuriant ground flora of bryophytes and ferns. As an example of such unmodified *Calluna* habitat this site is unique in Wales.<br><br>On shady slopes, the site contains what is considered to be the best development of the sub-alpine heath community *Calluna vulgaris-Vaccinium myrtillus-Sphagnum capillifolium* heath (H211 ) outside Scotland; this community forms part of the dry heath feature of this SAC. Other NVC types represented include H8 *Calluna vulgaris-Ulex gallii* heath, H10 *Calluna vulgaris-Erica cinerea* heath. The naming and numbering of communities follows the British National Vegetation Classification scheme and H12 *Calluna vulgaris-Vaccinium myrtillus* heath. Broad terraces have allowed the development of blanket mire, wet heath and valley mires. Unlike many upland areas, there are still some good remnants of native woodland supporting oceanic lower plants and ferns.<br><br>Public interest in the site is confined to hiking and some camping. However, when compared to other mountainous regions in North Wales, public interest is extremely low.<br><br>Rhinog SAC is underpinned by the Rhinog SSSI, and covers all but the main woodland compartments of the SSSI. These areas form part of the Coedydd Derw Meirion SAC and are not dealt with in this plan. The National Nature Reserve, owned and managed by CCW, which forms part of this site was designated a European Biogenetic Reserve in 1992. | Alpine and subalpine heaths<br>Depressions on peat substrates<br>Northern Atlantic wet heaths with Erica tetralix<br>Lakes (Oligotrophic to mesotrophic) standing waters<br>Floating water-plantain *Luronium natans* | |