

A Sustainability Appraisal of Cynllun Eryri - Consultation Draft, February 2020

Non-Technical Summary

February 2020

- NTS1. Snowdonia National Park Authority with its partners and stakeholders have prepared a new National Park Management Plan known as *Cynllun Eryri*. The plan is at an advanced stage in its preparation, being made open to public consultation before its proposed adoption for use in shaping the future management and care for the Snowdonia National Park across all of its Special Qualities.
- NTS2. As part of the overall process of preparing the plan, it must be subject to a Strategic Environmental Assessment and Sustainability Appraisal (SEA/SA). This document is a simple and concise summary of the process and findings of that process, and written to be accessible to a wide audience. The full 'Sustainability Report', which presents the findings of the whole process, is available on the NPA's website alongside the full draft Cynllun Eryri.

Sustainability Appraisal - A Process

- NTS3. In the UK, the process of Sustainability Appraisal is usually integrated with the requirements of European law that requires a very similar process of Strategic Environmental Assessment (SEA) to be undertaken.
- NTS4. The core purpose of SA/SEA is to assess the likely significant sustainability implications arising from the use of the emerging plan – in this case Cynllun Eryri. This can help plan-making bodies to identify the sustainability 'performance' of the plan, i.e. which policies might lead to more - or less, sustainable outcomes, and to revise those policies or proposals accordingly where it is appropriate to do so, before the plan is adopted.
- NTS5. It is important to recognise that SA and SEA are *processes* and, for emerging National Park Management Plans are closely linked and usually undertaken simultaneously. Whilst certain elements of the process are identified in law, there is no prescribed method for the assessment itself. However, regulations and government guidance require the Sustainability Report to provide the following information:
- An outline of the contents and main objectives of Cynllun Eryri and of its relationship with other most relevant plans and programmes (for example environmental law, national strategies and local programmes for protection and improvement of the environment, community well-being and economic health);

- A description of the most relevant aspects of the environmental, social and economic characteristics of the areas likely to be most affected by the emerging plan, and how they might evolve in the absence of the it;
- Any existing environmental, social or economic problems relevant to the plan, and how they would develop in the absence of the plan;
- The source references for the objectives for protecting the environment established at international, European Community and national level and how those objectives have been taken into account in the preparation of the plan;
- The method used in the Sustainability Appraisal and any limitations in information or appraisal techniques;
- An assessment of the broad options considered in developing the Plan's actions and objectives and the reasons for selecting the chosen options;
- An assessment of the measures contained within the proposed Cynllun Eryri against sustainable development priorities (specific to the area), and thus the main social, economic and environmental effects of the management plan;
- A description of any measures to maximise the beneficial effects of the objectives and actions of the plan or to reduce its potential harmful effects;
- Details of how the significant environmental, social and economic influence of Cynllun Eryri will be monitored;
- A non-technical summary of the detailed process and findings (this document).

NTS6. The Sustainability Appraisal of the emerging Cynllun Eryri has been carried out by Snowdonia National Park Authority.

The Plan Being Appraised: Cynllun Eryri 2020

NTS7. Cynllun Eryri is a plan required by law and the full consultation draft represents a key stage in the development of a new management plan for Snowdonia National Park. It sets out a long-term vision and a broad range of management priorities for the next five years. It will be used to bring together partners to deliver common aims for the National Park and will be the basis for setting the National Park Authority's Corporate Plan, corporate work programme and through these, performance management. It sets out to develop National Park policies on specific topics and to aid in

management decision-making (but not to determine it). It should help to draw in funding to deliver on the outcomes and actions identified. The plan presents strategic and topic-specific management objectives to guide the work of all partners operating to safeguard and provide a sustainable future, and how and where conservation and recreation opportunities should be managed. As a management plan for a national park, it operates in a context of wide-reaching other policies and laws which the NPA must operate within. The plan must also be responsive to the very specific locational, social, economic and environmental characteristics and conditions within Snowdonia National Park, which together means the scope of options in the plan are significantly constrained compared to some other types of plan.

NTS8. From the beginning of the management plan-making period, sustainability considerations have been at the heart of the joint work, and appraisal has been carried out as a parallel and integrated process. This helps ensure that the emerging plan will support more sustainable management decisions and priorities, which is a requirement in law. The process of Sustainability Appraisal for this plan began in 2018, when a Scoping Report set out explicit sustainability objectives to compare the plan by, and to inform the plan makers of sustainability issues to be considered in their work. This means that Cynllun Eryri, as it nears its final version, has been developed with a solid understanding of its likely implications for sustainable development, and has improved in this respect as it has evolved.

How has the Plan been appraised for Sustainable Development benefits?

NTS9. The process of SA/SEA has focused on how the emerging Cynllun Eryri might affect social, economic and environmental trends and conditions across the National Park, and looks to see how the plan would make a difference to those conditions. To do this, emerging outcomes and policies (the plan's proposals) have been tested against a set of criteria that have been prepared specifically for the sustainability context of Snowdonia National Park. These 'tests' are referred to as the ***Sustainability Framework***, and each element of Cynllun Eryri is tested against them.

NTS10. The Sustainability Framework has been influenced by a wide range of other policies within international, national, and local strategies relating to sustainability matters. Alongside these an assessment of the social, economic and environmental conditions and trends across the National Park has been made which identified what the main sustainability issues and concerns are. These considerations ensure that the tests against which the emerging plan has been appraised reflect local matters of importance and are directly pertinent to the plan. Some of the key sustainability issues identified relate to:

- Protecting the Special Qualities of the National Park from harmful change;
- Improving the resilience of landscapes, ecosystems and historic environment of the National

Park to the challenges of climate change, and to reduce factors which cause climate change;

- Balancing the sensitivity of the National Park’s landscapes, ecology and heritage with the need to support opportunities for local people and sustainable and balanced communities and their well-being;
- To protect and reinforce unique cultural heritage and the Welsh language;
- Maintaining a robust rural economy and access to services for rural communities, building on the Special Qualities of the National Park; and
- Limiting the impact of visitors on the National Park, whilst enabling improved, sustainable access.

Table 1 sets out the specific ‘tests’ prepared so that the emerging management plan can be appraised against its likely and significant sustainability performance.

Table 1		
No.	SEA/SA Objective	Guide Questions
1	To protect and enhance landscape character and quality	Will it protect and enhance all landscape character types? Will it protect tranquillity?
2	Sustainable Tourism	Are there common understandings of thresholds? Are proactive measures being undertaken to protect Special Qualities from negative impacts of Recreation?
3	To reduce soil contamination and promote the remediation of contaminated land	Will it facilitate the removal of contamination and promote remediation?
4	To protect and enhance biodiversity	Will it protect and enhance habitats and species? Will it facilitate the sustainable management of key wildlife sites? Will it work towards achieving favourable conservation status? Will it protect areas of ancient woodland? Will it protect designated wildlife sites? Will it protect the integrity of European designated sites?
5	To maintain and, where necessary, safeguard the Snowdonia National Park’s geology and geomorphology	Will it protect Regionally Important Geological and Geomorphological Sites (RIGs)?

		Will it protect and enhance the enjoyment of geological resources?
6	To safeguard the historic environment including built heritage, archaeology and the historic landscape	Will it protect: Scheduled Monuments Listed Buildings Conservation Areas Registered Parks and Gardens
7	To value and protect diversity and distinctiveness	Will it protect local diversity and distinctiveness?
8	To conserve, promote and enhance Snowdonia's cultural heritage and the Welsh language	Will it promote the use of the Welsh language?
9	To ensure that the location and design of new development is acceptable in terms of the potential consequences of flooding	Will it increase flood risk? Will it increase the use of Sustainable Drainage Systems? Will it reduce vulnerability to the effects of climate change?
10	To safeguard the quality and quantity of water resources	Will it protect and improve water quality? Will it ensure the sustainable use of water resources?
11	To minimise waste, increase re-use and recycling	Will it increase levels of recycling and re-use? Will it promote the take-up of sustainable waste management techniques?
12	To promote and facilitate improved community involvement	Will it develop opportunities for community involvement for all? Will it promote a sense of belonging and well-being for all?
13	To encourage sustainable diversification in agriculture and forestry	Will it encourage the uptake of local diversification schemes?
14	To improve the local skills base	Will it increase relevant skills levels?
15	To provide learning opportunities	Will it increase levels of participation in education and learning? Will it increase educational attainment?

		Will it promote Lifelong Learning?
16	To promote good transport links to support the local economy	Will it reduce travel distances between home and jobs? Will it reduce traffic congestion?
17	To aid the creation of local employment opportunities and businesses related to National Park purposes	Will it increase the number of SMEs
18	To promote access for all through the CRoW Act.	Will it promote access for all through the 'CRoW Act'?
19	To promote learning opportunities, information provision and interpretation	Will it promote the use of the Welsh language in the provision of information and interpretation? Will it increase information provision and interpretation?
20	To increase participation in a wide range of activities and experiences	Will it increase participation in outdoor pursuits?

NTS 11. Each emerging objective and action within Cynllun Eryri has been assessed against this framework. To record this transparently and systematically a matrix-system was used. In doing so an interpretation of likely and significant implications of the plan's implementation has been made, stating whether there are expected positive or negative sustainability outcomes. The assessment also identifies where the expected outcome might be less certain. In anticipating sustainability outcomes of the emerging plan the process has tried to consider whether sustainability effects may be short, medium or long-term, and whether cumulative or synergistic effects arise, to meet legal requirements. These are complicated considerations which result in varying degrees of confidence in assessment, although this is to be expected and is normal, particularly given the often aspirational and non-specific nature of the plan's actions.

Summary Findings of the Sustainability Appraisal

NTS12. To understand the level of significance of the findings of the Sustainability Appraisal of Cynllun Eryri it is necessary to acknowledge the importance of the plan in supporting sustainable development, but also that the legal, policy and stakeholder responsibilities context in which it arises significantly constrains the scope of actions it can lawfully adopt. By its very nature the plan cannot, and would not be expected to, propose actions which would be inherently unsustainable (given the statutory responsibilities of the National Park Authority). The process of Sustainability Appraisal for Cynllun

Eryri can be seen to be rather an additional insurance mechanism than an essential driver of sustainable policies and actions.

NTS13. In this context, the key findings from the SA/SEA process of the Cynllun Eryri include the elements set out in the following paragraphs (and presented in detail within Volume 2 of the full Sustainability Report).

Appraisal of 'Alternative Options'

- NTS15. An important part of SA/SEA is the testing of reasonable alternative options of the plan, so that the NPA can be informed as to which have the best sustainability credentials and to take these forward. In the case of Cynllun Eryri, a broad spectrum of environmental, social and rural development policy and legislation set out at European Community and National levels (such as the statutory purposes and duty for National Parks) - taken together – constrain the ability to consider objectives, or actions which do not fundamentally support locally responsive sustainable development outcomes. This has been influential from the start of the work on the new plan.
- NTS16. Therefore, realistic alternative policy options (having regard to general principles and constraints) have been considered as an integral part of the iterative development of the plan rather than explicit stages and consultation points, and have been (as appropriate) dismissed or retained in the period leading up to this stage of Cynllun Eryri's development.
- NTS17. Because of these constraints and fundamental purposes of the plan (to drive more sustainable management of Eryri), the National Park Authority do not consider that other policy options could have been generated and then critically assessed, as those would not be feasible outcomes for the plan itself.

Appraisal of the Vision and Outcomes

- NTS18. The Vision commits to ensuring that the landscape, biodiversity and historic environment resources are protected and this positively reflects many of the SA Objectives relating to the protection of the cultural and natural environment. The Vision's focus upon delivering a diverse and prosperous economy positively fulfils the SA Objectives relating to the creation of a sustainable economy and in the long-term could help to benefit the skills base of the National Park. There is also an emphasis placed upon the need for a 'sense of place' and bilingual and inclusive communities positively fulfilling those SA Objectives addressing accessibility to amenities and facilities, sustainable communities and community involvement. A strong sense of place is essential to creating feelings of 'belonging' and 'ownership' amongst communities. The emphasis placed upon culture and the Welsh language is also essential to meet the SA Objectives relating to the conservation, promotion and

enhancement of Snowdonia's cultural heritage and the Welsh language and should benefit community vitality and help to foster a good understanding of the Park's heritage in the long-term.

NTS19 The Vision was positively influenced by the sustainability appraisal process through proposing a clearer commitment to 'enhancement', rather than just protection of Special Qualities, and reference included to the long-term threat of climate change and the need for appropriate mitigation and adaptation to protect the character and quality of the National Park.

Summary of full assessment of Cynllun Eryri's Outcomes and Actions

NTS20 The substantive elements of Cynllun Eryri are its proposed 'outcomes' for the agreed sustainable future of the National Park, its environment, communities, local economy and cultural heritage. The assessment of these three outcomes (with associated more focused 'policies') forms the main body of the appraisal findings. **Table 2** sets out the summary findings of testing the merging plan against the sustainability test of the Sustainability Framework (as shown at Table 1).

Outcome	Overall Sustainability Effect	Comment
Eryri's Environment: Our natural and historic assets and stunning surroundings are cared for and enhanced	Positive	<p>The Outcomes in this section of Cynllun Eryri were assessed to have a major positive, long-term impact in 6 areas of the Sustainability Objectives framework, within the NP and with a permanent effect and low risk of uncertainty.</p> <p>These areas are: Protect and enhance landscape character and quality; Safeguard National Park geology and geomorphology; Protect and enhance biodiversity; Value, protect and enhance the historic environment including built heritage, archaeology and historic landscape; Value and protect local diversity and distinctiveness including townscape character; To promote mechanisms for waste minimisation, increased re-use and recycling.</p> <p>In a further 7 areas they were assessed to have a positive impact within SNP, with permanent results and a low risk of uncertainty.</p> <p>In the above 13 areas, these Outcomes were also expected to have an overall positive effect at the transboundary/regional level.</p> <p>7 of the Sustainability Objectives are not directly relevant to this Outcome, but are covered in detail in other areas of Cynllun Eryri.</p>
Eryri's Health and Well Being: Eryri provides a wealth of opportunities to learn and discover	Positive	<p>The Outcomes in this section of Cynllun Eryri were assessed to have a major positive, long-term impact in 6 areas of the Sustainability Objectives framework, within the NP and with a low risk of uncertainty.</p>

and at the same time, improve our well-being		<p>These areas are: Conserve, promote and enhance Snowdonia's cultural heritage and the Welsh language; To promote understanding and enjoyment of the Special Qualities of the National Park by the public; To promote and facilitate improved community involvement; To provide learning opportunities; To promote good transport links to support the local economy; To promote understanding, valuing and enjoyment of the language and of the cultural heritage in its broadest sense.</p> <p>In a further 6 areas they were assessed to have a positive impact within SNP, with permanent results and a low risk of uncertainty.</p> <p>In the above 12 areas, these Outcomes were also expected to have an overall positive effect at the transboundary/regional level.</p> <p>8 of the Sustainability Objectives are not directly relevant to this Outcome, but are covered in detail in other areas of Cynllun Eryri.</p>
Eryri's Community and Economy: Eryri is a great place to live, develop and work	Positive	<p>The Outcomes in this section of Cynllun Eryri were assessed to have a major positive, long-term impact in 5 areas of the Sustainability Objectives framework, within the NP and with a low risk of uncertainty.</p> <p>These areas are: Conserve, promote and enhance Snowdonia's cultural heritage and the Welsh language; To promote understanding and enjoyment of the Special Qualities of the National Park by the public; To promote understanding, valuing and enjoyment of the language and of the cultural heritage in its broadest sense; To promote and facilitate improved community involvement; To provide learning opportunities.</p> <p>In a further 8 areas they were assessed to have a positive impact within SNP, with permanent results and a low risk of uncertainty.</p> <p>In the above 13 areas, these Outcomes were also expected to have an overall positive effect at the transboundary/regional level.</p> <p>7 of the Sustainability Objectives are not directly relevant to this Outcome, but are covered in detail in other areas of Cynllun Eryri.</p>

NTS22. ***The sustainability appraisal therefore found that all expected effects of the implementation of Cynllun Eryri in relation to meeting the sustainability framework objectives either were positive (i.e. likely to further sustainable development) or be neutral (i.e. no relevant influence on some***

sustainability tests).

- NTS 23. Because of the long-term, stakeholder driven consensus approach to plan-making the sustainability appraisal and statutory context, these high levels of sustainability performance identified in the report should be expected. National policy and law and the distinctive and Special Qualities of Snowdonia National Park all combine to set a powerful range of influences likely to result in a plan that is focused on sustainable development, and the Sustainability Report supports this. The process of sustainability appraisal to this stage of the Cynllun Eryri's development has helped to ensure the plan will help further the aims of sustainable development when it is adopted and used to influence management of environmental and socio-economic issues in Snowdonia. Where the process has found parts of the plan where it is unclear how sustainable development objectives will be affected, other policies and policy safeguards will ensure such harm should not arise except for in exceptional circumstances.
- NTS24. The sustainability appraisal process will be continued if any significant changes are made to Cynllun Eryri before its final adoption by the National Park Authority in the spring of 2020.
- NTS25. For a detailed understanding of the process, its policy context and specific findings, see the full Sustainability Report for Cynllun Eryri at: www.snowdonia.gov.wales/authority/working-in-partnership/consultation.