

# SEA Environmental Report: Appendix C

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## Scoping Opinion Comments

Consultee	Comment	Response
Brecon Beacons National Park Authority	Paragraph 4.4 identifies the Brecon Beacons National Park Management Plan (2010-2015) as a document which includes a range of environmental protection policies for the Park which are relevant to transport proposals. One aim of the Brecon Beacons National Park Management Plan (LC3) states that 'Sustainable transport initiatives will enhance accessibility across the Park whilst reducing the reliance on private motor vehicles'. The Authority is currently undertaking a review of its Management Plan and we would welcome the opportunity to work with relevant organisations to develop links between emerging plans, initiatives and environmental protection objectives.	Noted.
Brecon Beacons National Park Authority	The Local Development Plan was adopted in December 2013 which allocates land for future development within the Park – this should link closely with public transport facilities. A new concept of Town/Community/Village Plans is emerging across communities within the park where issues regarding rural transport are often raised as being of paramount importance to the community. As an example the community of Hay on Wye have paid to have a bus service on Sundays and Bank Holidays.	The JLTP has identified public transport interventions such as Strategic Bus Corridor Infrastructure, and the Real Time Bus Information - Smart Mobile App which will result in beneficial impacts to communities across the National Park by improving access and information to public transport.
Brecon Beacons National Park Authority	The Sustainable Tourism Strategy was prepared in in 2012 and the Visitor Management Plan was prepared in 2013. The Visitor Management Plan advocates positive access management to recreation routes and developing and delivering the Brecon Beacons Visitor Transport Initiative. Recommendations in the Visitor Management Plan include the identification of priority sites for traffic management interventions and working with local people to identify and implement solutions, ideally based on local community implementation.	Noted.
Brecon Beacons National Park Authority	The Landscape Character Assessment for the Brecon Beacons National Park was prepared in 2012 and the Local Biodiversity Action Plan is an evolving document that should also be considered.	Noted. An assessment of policies and plans has been undertaken and is set out in Appendix A.
Brecon Beacons National Park Authority	The Brecon Beacons National Park Authority Rights of Way Improvement Plan advocates the integration of public transport and public access, identifying a need for improved links between public transport and the public rights of way network. It states that sustainable transport including community transport and public transport to access public rights of way within the National Park should	Noted. It is considered that the Strategic Bus Corridors and the proposed Active Travel for "designated" localities will provide additional linkages between public transport and active travel links.

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	be increased.	
Brecon Beacons National Park Authority	<p>The following sustainability issues, which were raised at a 'Town and Community Council Liaison Meeting (March 2014)', are considered relevant to this consultation:</p> <ul style="list-style-type: none"> <li>• Better Broadband in Rural areas.</li> <li>• Need to know the geographical reach for Superfast Cymru to allow business and education and access to services to plan</li> <li>• Flooding &amp; insurance issues for both properties which flood &amp; those perceived to be at risk (by insurers)</li> <li>• Lack of mobile phone signal in many rural areas – blackspots and failure during periods of higher usage.</li> <li>• Education quality &amp; loss of schools</li> <li>• Population trends; increasing 0-10yrs , and incoming over 50's</li> <li>• Ageing population</li> <li>• Provision of Affordable Housing (?)</li> <li>• Jobs &amp; Skills training</li> <li>• Jobs potential</li> <li>• Cost of living &amp; Energy resilience</li> <li>• Biodiversity</li> <li>• Water – availability</li> <li>• Weather fluctuations</li> <li>• Loss of land</li> <li>• Food production</li> <li>• Jobs - where will people work &amp; what as?</li> <li>• Infrastructure for employment-for National park area higher value (lower volume) processing &amp; microbusinesses more appropriate (lower volumes to transport)</li> <li>• Tourism- some benefits but employment tends to be seasonal</li> <li>• High business rates contributing to decline of town centres</li> </ul>	Noted. Of the issues that have been raised by the Town and Community Council, those relating to transport and the environment have been identified within Table 3-2.
Brecon Beacons National	The following identifies dominant issues and drivers of changes that affect or are likely to affect the National Park now and in the future:	Noted. As above, those issues relating to transport and the

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Park Authority	<ul style="list-style-type: none"> <li>• Climate Change</li> <li>• Biodiversity</li> <li>• Farming Pressures</li> <li>• Local Population Pressures</li> <li>• Renewable and Non-renewable energy</li> <li>• Transport</li> <li>• Globalization</li> </ul>	environment have been identified in Table 3-2.
Brecon Beacons National Park Authority	<p>Are there any specific indicators you feel should be included?</p> <ol style="list-style-type: none"> <li>1. Death from Road Traffic Accidents</li> <li>2. Total number of KSI (Killed or Seriously Injured) casualties per year</li> <li>3. Distances travelled per person per year by mode of transport</li> <li>4. Local authority air quality monitoring indicators (1,3-butadiene, benzene, carbon monoxide, lead, NO2, PM10, SO2)</li> <li>5. Carbon footprint</li> <li>6. Public transport routes in the Brecon Beacons National Park</li> <li>7. Access to GP or primary care professional</li> <li>8. Access for disabled people</li> <li>9. Access in rural areas</li> <li>10. Accessibility to health care facilities</li> <li>11. An indicator relating to the issue of: <ul style="list-style-type: none"> <li>• The loss or impairment of geodiversity</li> <li>• The loss or impairment of historic landscapes, scheduled ancient monuments and other archaeological features</li> <li>• Threats to biodiversity from habitat loss and the anticipated effects of climate and agricultural change</li> <li>• Impoverishment of the quality and character of the built environment</li> <li>• Loss of tranquillity within the Brecon Beacons National Park</li> <li>• Poor access to services in rural areas</li> </ul> </li> </ol>	The draft monitoring framework set out in Table 5-1 has taken account of those specific indicators relevant to the Mid Wales JLTP.
NRW	<p>We note that the SEA objectives for the joint plan have been formed following review of the SEA objectives used in the SEA of the Welsh National Transport Plan (2010) and the North Wales Regional Transport Plan (2009, which will be superseded by the North Wales Joint Local Transport Plan). NRW welcomes this approach together with the review of other relevant plans, programmes and environmental protection objectives, the baseline data and the key issues and opportunities.</p>	Noted.

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NRW	We note that the Joint Plan will be considered against the objectives of the Water Framework Directive. We welcome the opportunities identified in section F.4.2 relating to flood risk and water quality and in particular the opportunity to incorporate sustainable drainage systems and to avoid infrastructure development in area of high flood risk.	Noted.
NRW	With regards to biodiversity, whilst it is identified that transport infrastructure improvements can lead to the loss of habitat, the need for schemes to retain existing connectivity or redevelop lost connectivity both in the short and long term through replanting schemes needs to be fully acknowledged.	Refer to the assessment of the detailed interventions in Appendix B which identifies key impacts and mitigation. The incorporation of mitigation relating to habitat retention and enhancement has been identified within the assessments.
cadw	It should be noted that during the preparation of the Transport Plan, a Heritage Bill is scheduled for introduction to the National Assembly for Wales in spring 2015. Technical Advice Note 24, will also be produced which will link this and the Planning Bill	Noted.
cadw	Historic landscapes included in Part 2 of the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales should be noted as should the information held in the Historic Environment Records maintained by the Clwyd-Powys Archaeological Trust, the Dyfed Archaeological Trust and the Gwynedd Archaeological Trust.	Noted. Baseline Section contained in Appendix A has been updated accordingly.
cadw	<i>Are there any particular topics or geographical areas of specific concern to your organisation?</i> That any proposals in the Plan do not have any impact on the outstanding universal values of the World Heritage Site of the Castles of Edward I or those of the Slate Industry of North Wales which is included in the Tentative List for World Heritage Sites	Noted, it is considered that the proposed interventions are currently at the strategic stage, any proposed interventions will be subject to the design process which will account for the presence of current or proposed World Heritage Sites as part of the environmental assessment.