

---

## ***Appendix 13 – Responses received to the ISA/HRA accompanying the 2<sup>nd</sup> Deposit LDP***

---

This document was prepared to collate the responses made to the Integrated Sustainability Appraisal (ISA) & Habitat Regulation Assessment (HRA) of 2<sup>nd</sup> Deposit revised Local Development Plan (rLDP), as published for consultation on 17/02/2023.

### **Summary: Integrated Sustainability Appraisal**

A total of 12 representations were submitted during the consultation of the ISA, with responses from seven consultees including Welsh Government, Pembrokeshire Coast National Park Authority (PCNPA), and Carmarthenshire Residents' Action Group (CRAiG), alongside members of the public (Table 1). Upon inspection, eight representations were deemed to have specific relevance to the ISA (concerned relating to rLDP matters and were, therefore, passed on to Forward Planning Officers for review). Out of the relevant representations made, common themes included the removal of Special Landscape Areas and baseline data inconsistencies (e.g., originally using the indicative (*not predictive*) Agriculture Land Classification).


### **Summary: Habitat Regulation Assessment**

A total of 18 representations were submitted during the consultation of the HRA Addendum, with responses from Natural Resource Wales (NRW), Pembrokeshire Coast National Park Authority, Dŵr Cymru, and Welsh Government (Table 2). The majority of these concerned phosphates, in addition to other matters which require further material clarity and minor corrections/strengthening of wording.

No further comment was received on the HRA Report (as amended by Appendix A within the HRA Addendum, and previously consulted upon during the first deposit), other than acknowledgement which expressed support for the changes made due to the previous consultation (see HRAREP15).

**Table 1. Summary of ISA consultation responses. Reference numbers refer to Appendix A of the ISA Addendum (Feb 2024).**

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
ISAREP1	<p>Neil Hemington [5816]</p> <p>Welsh Government [2782]</p>	<p>Extract taken from page 11 of letter dated 12<sup>th</sup> April:</p> <p><i>Category B Best and Most Versatile (BMV) Agricultural Land: (TAN 6 Annex B1, Future Wales: the National Plan 2040 Policy 9 and PPW 3.58 &amp; 3.59) ISA Report: BMV agricultural land policy is partially considered under ISA Objective 7 – Soils. It is unclear what weight BMV carries in Objective 7, how the policy has been addressed in the ISA or the evidence used for the appraisal. There is no evidence to demonstrate how BMV policy has been considered within the spatial strategy assessment, site selection process or how the choices made in the plan impact the BMV resource.</i></p> <p><i>In “Table 24 – Summary of Secondary, Cumulative and Synergistic effects of all policies and site allocations in the plan” it is stated for ISA – Soil: “Whilst promoting the regeneration of contaminated land, the cumulative losses of finite quality soil resources from development occurring on greenfield sites (and those rates highly through the ALC in addition to a few instances of peatlands) will be widespread. Nevertheless, the distribution settlement framework ensures negative impacts are not concentrated within a given area and is more likely to lead to the utilisation of dispersed brownfield fields throughout the County.” (Emphasis added). It is not clear what the BMV or peatland resource is and how it will be affected by the plan.</i></p>	<p><i>A dedicated Topic Paper has been produced in the interim. This sets out how the BMV requirements have been considered during the assessment of all site proposals.</i></p> <p><i>Elements concerning ISA Objective 7 should be amended throughout accordingly, reflecting BMV Guidance Note (Version 2.1 – published May 2021) and Predictive Agricultural Land Classification Map (Wales).</i></p> <p><i>Individual site assessment proformas should also be updated to reflect the Topic Paper’s findings.</i></p> <p>The baseline data (Appendix B) should be updated in line with the action taken.</p> <p>While the majority of proposals determined to cover grade 2 and 3a BMV are considered to have already been appropriately assessed (-), regrading should be conducted accordingly (as summarised in Table 24).</p> <p>This affects sites covering Grade 2 (PrC2/h22, SeC5/h2, PrC2/E2(iv), PrC2/E2(i), SeC4/h1, PrC2/E2(v), SeC5/h1, SuV22/h1, PrC2/E2(ii), SeC7/h4, SeC6/h1) and Grade 3a agricultural soil (PrC1/MU1, SeC15/h1, SeC20/MU1, SeC20/h2, SuV8/h1, SeC20/h1, SuV17/h1, SeC19/h2, PrC2/E2(vi), SeC12/h1, SeC18/h6, PrC1/h8, PrC2/E2(viii), PrC1/E1(ii), SuV18/h1, SuV63/h1, PrC1/MU2, SuV15/h1, PrC1/E1(iii), PrC1/h7, PrC1/h14, PrC1/E1(i), SeC8/h3, SeC19/E2, PrC2/h23, PrC2/E2(ii), PrC2/h22, PrC1/h15, SuV61/h1, SeC15/h2, PrC2/E2(i), SeC12/h2).</p> <p>Table 24 should also be updated accordingly.</p>

Ref	Consultee	Consultee Comment (as italicised)	Response/Action				
			<p>There is only one site concerned with peatlands - Nant y Caws Regeneration and Mixed-Use Site (PrC1/MU3). Using <a href="#">the Peatlands of Wales Map</a>, the site was found to cover a total peatland area of 2.429 ha (2.78% of site area in peripheral areas). At the planning application stage, project-level mitigation should be considered in order to conserve these resources.</p>  <p>Reference is made to Ref 3, 16 – 18.</p>				
ISAREP2	As above	<p>Extract taken from page 11 of letter dated 12<sup>th</sup> April:  <i>ISA Appendix B – Baseline Information: It is noted on P41 that “According to the Agricultural Land Classification (ALC) data available, there is no Grade 1 land and limited Grade 2 present within Carmarthenshire. A patchwork of Grade 3 land is situated towards the south and southeast of the county following the Tywi river valley, stretching from Llandovery in the east, through Llangadog, Llandeilo and Carmarthen. Most land in Carmarthenshire is classified as Grade 4 land, with a small proportion of Grade 5 land situated towards the northeast of the County. View the Predictive Agricultural Land Classification Map 2 for further details.” (Emphasis added). While the Predictive ALC Map (v2) is referenced it is not clear how it has been used.</i></p>	<p>Text to be replaced within Appendix B (page 41):</p> <p>According to the <a href="#">Version 2 of the Predictive Agricultural Land Classification (ALC) Map</a>, there is a very limited area of Grade 1 and Grade 2 present within Carmarthenshire. The majority of soil is classified as Grade 3b, 4, and Non-Agricultural (as noted within the Table below).</p> <table border="1" data-bbox="1406 1398 1872 1469"> <thead> <tr> <th>ALC Grade</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>Non-Agricultural</td> <td>35093.156</td> </tr> </tbody> </table>	ALC Grade	Area (Ha)	Non-Agricultural	35093.156
ALC Grade	Area (Ha)						
Non-Agricultural	35093.156						

Ref	Consultee	Consultee Comment (as italicised)	Response/Action														
		<i>The statement does not provide details of the BMV resource present in the authority and the baseline information used has not split ALC grade 3 to 3a and 3b (BMV and non-BMV) which suggests out of date information may have been used.</i>	<table border="1"> <tr> <td>1</td> <td>9.165</td> </tr> <tr> <td>2</td> <td>520.476</td> </tr> <tr> <td>4</td> <td>59270.802</td> </tr> <tr> <td>5</td> <td>21170.404</td> </tr> <tr> <td>3a</td> <td>17169.167</td> </tr> <tr> <td>3b</td> <td>75638.112</td> </tr> <tr> <td>Urban</td> <td>5549.273</td> </tr> </table> <p>Reference is made to Ref 3.</p>	1	9.165	2	520.476	4	59270.802	5	21170.404	3a	17169.167	3b	75638.112	Urban	5549.273
1	9.165																
2	520.476																
4	59270.802																
5	21170.404																
3a	17169.167																
3b	75638.112																
Urban	5549.273																
ISAREP3	Mr JR Harrison [539]	<i>i support the document regarding change of village boundary in Llanllwch SR/098/002 and believe this change will not have a detrimental effect on the village or its surroundings as there is 1 property only</i>	<p>This representation refers to the rLDP itself and is, therefore, not appropriate to be reviewed in context to the ISA. Representation passed onto FPOs.</p> <p>rLDP Rep: 5799</p>														
ISAREP4	Mrs Lindsey Harrison [5502]	<i>i write in support of the increase to the village boundary in LLANLLWCH candidate site SR/098/002 in the revised LDP2. The proposal would be to build 1 retirement bungalow for us, having lived here for 26 years. I do not consider a developement on this site would have a detrimental effect on the character and setting of the settlement.</i>	<p>As above</p> <p>rLDP Rep: 5800</p>														
ISAREP5	Patricia Morgan-Black [5837]	<i>The Towi Valley area including Llandoverly and Llandeilo can be overlooked as a beautiful, outstandingly breath taking countryside. Though it is unlikely that the area could be given a protection as so much of the surrounding areas have designated status, this should not mean development in the area. Everyone understands the need for sustainable development, and it is clear that renewable energy is important. However when planning and reviewing plans the LA must consider the full environmental and economic impact of development. For example the transportation of electricity from the Welsh Boarder to Carmarthen could be installed at ground level along the existing railway line. This could have additional economic benefits to Transport Wales and help sustain the railway. The installation of Pylons to transport the electric is likely to impact the tourism potential of the area (which already has to compete with two national parks and an AONB). The economies of the two towns need the income from the tourism sector to make their businesses viable. It is important the any planning documents or decisions reflect the need to protect the countryside and enhance its beauty not open it up to development however sustainable it may appear. It is interesting that people</i>	<p>As above</p> <p>rLDP Rep: 5801</p>														

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
		<p><i>wishing to achieve off grid lifestyle development must submit complex applications whilst the potential weakening of the Towi Valley status and the development of pylons appears to be linked, surprising as the community appears strongly against this type of development in the area.</i></p>	
ISAREP6	<p>Janice Morgan (Clerc ar ran) Cyngor Cymuned Cilymaenllwyd [29]</p>	<p>As Translated:  <i>The following are general comments, from Cilymaenllwyd Community Council responding to the consultation on Carmarthenshire County Council's Second Amended Deposit Local Development Plan. The comments relate specifically to the 3 sites within the Cilymaenllwyd community allocated in Cluster 6, as stated in table 23 (page 87 of the consultation document), namely: □ SuV44/h1 Land to the back of Talar Wen □ SuV55/h2 Land to the back of Maes Glas □ SuV55/hs Land to the North of Cross Inn Inn To begin with, Efailwen and Glandy Cross houses occasionally have problems with their water supply due to very low water pressure, especially in periods of drought, which creates a lot of frustration among residents. This therefore raises the question of whether the planned developments in the sites in question can cope with this increasing demand for water? The sewerage systems are self-sustaining but the water system is already under stress. It is felt that the current infrastructure is not sufficient as it is. The soil in the area is also full of clay which causes drainage problems which could cause a lot of water to accumulate on the roads in periods of heavy rain. The cultural, linguistic and community impact on the village and the wider community must also be considered. There are several houses for sale in the village at the moment and a large number of these have already been bought by people who have moved to the area, mostly non-Welsh speaking. The linguistic nature of the local primary school has consequently changed dramatically since the last 5 years. However, many of the houses for sale are expensive and are not considered affordable. Perhaps the development would attract, or enable local people and families with young children, to buy, stay or return to the area, at a fair price of course. It is strongly felt that it is necessary to consider how the County Council will go about giving priority to local people who have grown up in the area. A developer who builds houses on the land, and then sells them on at a price that is beyond the reach of local people, would not solve the situation at all. Perhaps it would be beneficial for the Council to consider the possibility of building houses to rent at a fair price while making sure that people who have been raised and work in the area would be given priority. There are no council houses available in the area because they have been</i></p>	<p>As above  rLDP Rep: 5578-80, 5582-84</p>

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
		<p><i>sold. If this were an option it would have to be made sure that a local policy was in force to make sure that local people would be offered these houses. In a number of areas the building of houses has led to an increase in the number of immigrants to the area and the loss of our people and our young families - a cycle that rural communities cannot control or influence at the moment. The comments above are supported again: if it is intended to proceed with these developments in the 3 sites above, it is vitally important that they are affordable housing in order to keep our young people in the area. A successful way would be to offer houses for rent. Who will get the construction contract? Often these go to large companies, not local builders, therefore not supporting the local economy. What about the impact of the influx on our culture? Often people from further afield buy, especially with people now able to work from home, as the houses are much cheaper in these areas compared to the areas they are moving away from. The effect is clearly visible on our community and its Welshness is eroding from one decade to the next. The 2022 census shows that 51% of Cilymaenllwyd residents speak Welsh and 53% can speak, read or write Welsh. With this in mind, there is a need for responsible and very careful forward planning and the setting of policies that will support local people to be able to stay local, rather than push them out of their homes. The policies and plans need to be ones that really protect what we have; not ones that contribute to further cultural and linguistic decline. These comments are not an objection to the proposed developments but a community appeal for development work that is sensitive to the needs and character of the community; which adds to the sustainability of the community; which meets the needs of our local people; not development work that could lead to a change in the unique character of the community. Cilymaenllwyd Community Council is keen to make the community a pleasant place for its local people to live and work in; increase the opportunities for people to be able to contribute positively in a sustainable and safe way in order to protect the community for the next generation. To be able to do that, the Local Development Plan must be able to support that. We feel that it is important that Carmarthenshire County Council hears the voice of the Cilymaenllwyd community regarding this Development Plan, and we very much hope that these comments will be given due consideration. thank you very much</i></p>	

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
ISAREP7	<p>Mr Havard Hughes [5475]</p> <p>CRAiG [5827]</p>	<p>Summary as provided on Opus:  <i>As the ISA needs to take into account the effect of the Revised LDP being adopted, against the baseline of the Current LDP. However, Special Landscape Areas are not mentioned in the main text of the ISA, nor the ISA Appendices, outside of the Baseline and list of Abbreviations. Failure to take account of the loss of this designation from the LDP is a major error and questions the credibility of the appraisal of predicted effects on ISA9 – Landscape, throughout the ISA document and brings into question the soundness of the Plan. See letter.</i></p> <p>Extract taken from section 5 (pages 10-11) of letter dated 14<sup>th</sup> April:</p> <p><b>5. Adequacy of the Integrated Sustainability Appraisal assessment as it concerns Landscape:</b> <i>We are raising substantive concerns with regard to the robustness of the assessment carried out in the Integrated Sustainability Appraisal ('ISA').</i></p> <p><i>The Sustainability Appraisal Scoping Report (published July 2018) set out the parameters of the Sustainability Appraisal, identifying Sustainability Issues and Opportunities, Sustainability Assessment Objectives and Decision Making Influences. This identified Landscape as number 9 of a total of 15 equal issues. Issue 9 is set out as follows: 'There are several sites designated as of landscape or townscape value within the county. These features need to be protected, and where possible enhanced.' In the Decision Making Influences, the question, 'Will the LDP have a positive or negative impact on designated landscapes?' is posed.</i></p> <p><i>Linking these two quotes is the specific mention of 'designated landscapes', not statutory designated, nor 'Designated' noun. Special Landscape Areas are considered designated landscapes in this definition. This is the case in comparable LPAs in Wales, PPW11 para 6.3.12 refers to 'the designation of Special Landscape Areas' and the Current LDP Policy EQ6 states that 'Special Landscape Areas are designated...'. Thus, references to designated landscapes in the Sustainability Appraisal, must take into account local as well as statutory designations, including SLAs. The question 'will the LDP have a positive or negative impact on designated landscapes?' and that the Revised LDP removes some of these designated landscapes, is an important consideration for the assessments in the Sustainability Appraisal.</i></p>	<p>The contemporary relevance and utility of SLA designation is a contentious issue within the planning system. Research demonstrates that SLA designation as a tool for promoting landscape protection and due consideration is outdated, and that landscape character should instead be of primary concern.</p> <p>Therefore, the proposals set out within the rLDP are aimed to embed a more holistic whole-county approach to landscape character protection, and is considered to be more consistent and relevance to the current planning context.</p> <p>Nevertheless, officers agree that the absence of explanatory commentary is an oversight of both the previously published SA and the most recent appraisal within the ISA.</p> <p>Elements of the ISA should be amended to reflect the consideration outlined within this representation.</p> <p>The assessment should include commentary related to the removal of SLA as a non-statutory designation, in alignment with the ISA Framework (i.e., the specific guidance originally agreed for ISA9).</p> <p>Commentary should provide an evidence-based evaluation of the utility of SLA designation, highlighting the drawbacks of boundary-based compartmentalisation which the designation of SLAs currently promote.</p> <p>Crucially, the assessment should consider if/how proposals contained within the rLDP provide an enhanced platform for mitigating contemporary development pressures.</p> <p>A supplementary SPG (supported by the finding of a county-wide Landscape Character Assessment use a</p>

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
		<p><i>Sustainable development is defined in the Well-being of Future Generations (Wales) Act 2015 as the 'process of improving the economic, social, environmental, and cultural wellbeing of Wales by taking action.' A change to the development plan which removes some designated landscapes should be considered carefully and assessed robustly on the terms that those designations have been removed, to demonstrate that the change is not an impairment to sustainable development.</i></p> <p><i>Turning to the latest version of the ISA, published February 2023. The prediction of the effects of the plan involves identifying changes to the environmental baseline. The baseline for sustainability objective ISA9 – Landscape is set out in ISA Appendix B (pp.61-67) with the other baseline assessments. This baseline constitutes an introductory paragraph explaining that the Brecon Beacons National Park sits outside the LDP boundaries, along with a copy of the Current LDP Appendix 4 Special Landscape Areas assessment in full, then proceeds to state the 'Predicted effect without implementation of the LDP'.</i></p> <p><i>In our view, this assessment of predicted effects has been carried out incorrectly. The predicted effects mention protected habitat and species and biodiversity, which are assessed under ISA2 Biodiversity, and fails to comment adequately on changes to landscape as a characteristic in and of itself. Crucially, this assessment fails to note that the locally designated landscapes, SLAs, will continue to be in effect once the Plan period expires. This is, in our opinion, a substantive omission especially given that the baseline text is comprised of Special Landscape Area descriptions and assessing areas noted as being 'worthy of the protection that the designation of SLAs provides.'</i></p> <p><i>Section 4 of the ISA sets out a summary of the environmental baseline and predicted effects, noting that the future baseline for landscape is declining. This summary has a stronger summarisation of the likely effect on landscape than that set out in the ISA Appendix and states clearly that 'landscape protection measures should be strengthened'. As this assessment is provided on the basis that the Current LDP continues to remain in place, the need to have measures strengthening landscape protection must be considered to be in addition to those already in place, including the designated SLAs.</i></p> <p><i>As the ISA needs to take into account the effect of the Revised LDP being adopted, against the baseline of the Current LDP remaining, some</i></p>	<p>robust methodology) will identify and describe distinctive landscape character areas.</p> <p>When considered holistically with the embedded policies, well-designed developments may have the potential to contribute positively to the landscape and visual character (d), and preserve and enhance or restore existing landscape character features (e).</p> <p>Reference is made to Ref 9.</p>



Ref	Consultee	Consultee Comment (as italicised)	Response/Action
		<p><i>assessment of the removal of the local designated SLAs would be expected in the ISA. However, Special Landscape Areas are not mentioned in the main text of the ISA, nor the ISA Appendices, outside of the Baseline and list of Abbreviations. Failure to take account of the loss of this designation from the LDP is, in our view, a major error and questions the credibility of the appraisal of predicted effects on ISA9 – Landscape, throughout the ISA document and brings into question the soundness of the Plan.</i></p>	
ISAREP8	<p>Mr Havard Hughes [5475]</p> <p>CRAiG [5827]</p>	<p>Extract taken from section 5 (page 11) of letter dated 14<sup>th</sup> April:  <i>There are also other concerning errors and omissions. One example is the review of SP16: Climate Change and associated specific policies CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas and CCH2: Renewable Energy Outside Pre-Assessed Areas and Local Search Areas, in Appendix F and G. The appraisal considers the effects on landscape to be ‘neutral’ and with ‘positive and negative effects’. This is not credible given the scale of change proposed to the landscape on the basis of the targets for new wind power generation by 2033, and this target set in the context of the removal of the SLAs from the LDP. A negative effect should be identified. Whether the negative effect should be acceptable on balance is a test that is separate to this specific part of the ISA. The ISA should credibly take into account the high magnitude of the changes, the Plan’s intention to remove the SLA designated landscapes, and the effect characteristics including the scale of cumulative effects, their special extent and their probability; all of which is high impact and likely.</i></p>	<p>Officers agree to the need to regrade ISA-9 (landscape) for SP16 (as contained in Appendix F; Page 50-51) and associated policies CCH1 and CCH2 (Appendix G; Page 56-58). SP16 is a general statement of policy and, while it does support certain kinds of proposals, it does not contain proposals for development (including wind turbines). Visual amenity and landscape value are already explicit considerations within CCH2 (Appendix G; Page 56-58).</p> <p>It is important to note that policies CCH1/2 do not propose tangible renewable energy developments, and they instead define the parameters in which associated applications are to be assessed. The rLDP also does not set targets for the number or scale of wind power proposals.</p> <p>Carmarthenshire does contain one Pre-Assessed Areas for Wind Energy as set out in Future Wales (as reference within the ISA). Any proposal for large-scale wind energy as described in CCH1 may be classified as a Development of National Significance (DNS) and, as such, these planning applications may be determined by Welsh Ministers. As further outlined in <a href="#">Future Wales</a>, Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way (subject to conforming to criteria set out in Policy 18 [which, of many preventive measures,</p>

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
			<p>ensures that no unacceptable adverse visual impacts will occur to nearby communities and individual dwellings]).</p> <p>Provide explanatory commentary for the assessment of ISA9 within SP16 (Appendix F; Page 50-51). Reference is made to Ref 8, 10, 11.</p>
ISAREP9	As above	<p>Extract taken from section 5 (page 11) of letter dated 14<sup>th</sup> April:  <i>Another example is the review of SP14: Maintaining and Enhancing of the Natural Environment, where the Appraisal comments against ISA9 state that 'This policy directly refers to the protection and enhancement of Carmarthenshire's landscape' (ISA Appendix F, p.46). This policy does not do as the Appraisal states. The protection and enhancement is directed at the natural environment more generally, it is not a policy linked back to ISA9 in its monitoring objectives, and points more generally to a confusion throughout the Revised LDP between the character of landscape as a visual and integral whole vs smaller scale aspects which make up the natural environment, which are nonetheless important, but fundamentally different.</i></p>	<p>The explanatory text should be updated accordingly although the grading of should remain unchanged.</p> <p>Reference is made to Ref 7.</p>
ISAREP10	<p>Gayle Lister [5815]</p> <p>PCNPA [1167]</p>	<p>Extract taken from page 5 of letter dated 11<sup>th</sup> April:  <i>Appendix E: Growth Options</i>  <i>1st Deposit LDP Preferred Growth Option: check shading for ISA3. The appraisal is '+/-'and the shading is that of minor negative effect rather than the yellow of positive and negative effect.</i></p>	<p>Correct shading according.</p> <p>Reference is made to Ref 4.</p>
ISAREP11	As above	<p><i>Appendix F: ISA Strategic Policies</i>  <i>SP 2: Retail and Town Centres: ISA Objective 1 has a positive assessment but no commentary.</i></p>	<p>Explanatory text to be provided:</p> <p>The policy recognises the characteristics of provision in a traditional hierarchy ranging from localised provision through to larger population centres. Proposals for retail and other town centre use development is likely to create employment and leisure opportunities which will contribute positively to a sustainable economy and social inclusion.</p> <p>Reference is made to Ref 5.</p>

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
ISAREP12	As above	<i>SP 10: Gypsy and Traveller Provision: ISA Objective 8 is neutral. Could this be a positive since providing sites sustains Gypsy and Traveller culture?</i>	Change appraisal according and provide explanation.  Reference is made to Ref 6.

**Table 2. Summary of HRA consultation responses. Reference numbers refer to Appendix A of the HRA 2<sup>nd</sup> Addendum (Feb 2024).**

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
HRAREP1	Sharon Luke [3253]  Natural Resources Wales [3252]	<i>Extract taken from section 3 (page 20) of letter dated 14<sup>th</sup> April: With regard to paragraph 3.2.17, and the screening out of the updated preferred strategic growth option on the grounds that the implications of change provided for by this framework are more appropriately assessed under later, more specific, policies through which growth will be implemented, it is important to note that the HRA handbook quoted goes on to say that the assessment should note under the reasoning for the assessment that any potential effects are in any event addressed via a specific policy, for example 'but implications are assessed under policy xx below'. The possibility of a driver for a significant effect being an objective (rather than a later policy) that is not further developed in the plan, however, cannot be ruled out entirely, and if one occurs it should be screened in for further assessment (or promptly modified). Clarification is therefore needed as to which specific policy/ies in the rLDP the updated preferred strategic growth option is more appropriately subject to assessment through.</i>	Officers agree with this comment.  Need to explicitly state the policies under which the driver of impacts associated with the preferred growth option is more appropriately assessed under.  Paragraph 3.2.17 should be amended to include the following: "...through which growth will be implemented (explicitly, rLDP Allocations*)."  Insert new footnote = * rLDP Allocations hereinafter refers to those proposed development sites listed within Policies SG1: Regeneration and Mixed-Use Sites, SG2: Reserve Sites, HOM1: Housing Allocations, EME3: Employment Proposals, and SP10: Gypsy and Traveller Provision.  Reference is made to Ref 54.
HRAREP2	As above	<i>Similarly, Table 4 and paragraph 3.2.20 should provide clear links to specific policies in the rLDP to where the Strategic policies are assessed.</i>	As above.  Amend paragraph 3.2.20 and Appendix E accordingly.  Reference is made to Ref 55 and 57.
HRAREP3	As above	<i>Furthermore, in Table 5, for the specific policies referred to in the first two rows, it is stated these were found to be more appropriately assessed through the specific allocations respective to each SAC catchment, but links to these assessments are not provided.</i>	Officers agree with this comment.  "...to each SAC catchment (rLDP Allocations)."  Reference is made to Ref 58.
HRAREP4	As above	<i>Regarding paragraph 3.2.28, it is unclear whether the 116 allocations referred to as 'commitments' (those with extant/full planning permission) and which have already been subject to assessment under the Regulations at the project stage, including consultation with NRW as the Appropriate Nature Conservation Body, whether this assessment and accompanying consultation was undertaken prior to the publication of the phosphorus compliance report in January 2021.</i>	Officers agree with this comment which refers to a factual error.  Amend paragraph 3.2.28.  Reference is made to Ref 59.

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
HRAREP5	As above	<p>Extract taken from comments on Appendix C: Phosphate Assessment Appendix (page 20-21) within letter dated 14<sup>th</sup> April:</p> <p><i>Section 4.3 does not appear to clearly refer to the need to safeguard measures that are required to restore the SAC, to avoid them being used up and 'cancelled out', thereby preventing or disrupting restoration work, or the potential for future restoration i.e., making restoring the SAC more difficult. The need to ensure this is avoided is a key principle and should be referenced.</i></p>	<p>Officers agree with this comment.</p> <p>Add paragraph in 5.6.1 stating that the described mitigative works must not prevent or disrupt other restorative work aimed at improving the condition of the SAC catchment/waterbody.</p> <p>Reference is made to Ref 63.</p>
HRAREP6	As above	<p><i>The Development Phasing set out in section 4.3.2 does not appear to be tied to the delivery of defined milestones, and the length of time these milestones will take to deliver. This is a key element of delivering nutrient neutrality and of avoiding adverse effects, and we advise that further information is required to provide confidence that development release is tied to the delivery of mitigation which itself is preventing/removing phosphorus from waterbodies in corresponding quantities.</i></p>	<p>Officers agree with this comment.</p> <p>We have already produced the phasing for both mitigation and delivery in the IAP, however we should alter the HRA to align with this.</p> <p>FPOs should ensure change further changes to the housing trajectory is in alignment with the development phasing outlined in the IAP.</p> <p>Reference is made to Ref 63.</p>
HRAREP7	As above	<p><i>The proposals for constructed wetlands in the Teifi catchment appear to rely largely on Ceredigion County Council (paragraph 4.4.2 refers to support being expressed in a meeting on 15th December 2022). Whilst a robust Development Management policy may be relied upon to ensure adverse effects are avoided, there are questions around certainty and deliverability of mitigation that may be required to facilitate development, if it is outside your Council's control. There also needs to be some consideration to location, with the risk being an increased discharge at the top of the SAC and a constructed wetland removing phosphorus at the bottom of the SAC, resulting in a net increase in phosphorus over much of the SAC. This risk does not seem to have been considered.</i></p>	<p>Officers agree with this comment.</p> <p>A dedicated State of Common Ground (SoCG) between neighbouring LPAs and other key stakeholders has been produced in the interim.</p> <p>Integrate and signpost the SoCG within the HRA. Include further explanation around the location of the wetlands as well as recent updates to source apportionment (e.g., Tywi SAGIS Data).</p> <p>Explicitly state that mitigative solutions must be delivered in accordance with the proposed developments situation, ensuring phosphorus removal is sufficiently undertaken before entering the SAC waterbody.</p> <p>Reference is made to Ref 63. Furthermore, reference is made to paragraph 1.1.2 and 3.2.8 of the 2<sup>nd</sup> HRA</p>

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
			Addendum, additionally paragraph 5.5.3 of the associated Appendix C.
HRAREP8	As above	<i>There are several matters that require clarification and there is significant further work to be undertaken with regards to developing and agreeing the mitigation required. As such, at this time, we do not believe it is possible to conclude with appropriate certainty that the 2nd Deposit rLDP will not have an adverse effect on the integrity of the river SACs and therefore does not meet the test of soundness.</i>	<p>This comment made by the SCNB highlights the soundness of the plan in context to riverine SACs. Nevertheless, further work clarifying the remedial approaches within the HRA (and suite of supporting documents e.g. IAP) are expected to address this comment.</p> <p>Further work clarifying the remedial approaches within the HRA (and suite of supporting documents e.g. IAP) are expected to address this comment.</p> <p>Adhere to the agreed responses and embed the ensuing actions.</p> <p>Reference is made to Ref 63.</p>
HRAREP9	Neil Hemington [5816]  Welsh Government [2782]	Phosphates are noted as a Category C core matter that needs to be addressed (i.e., <i>there to be a lack of certainty or clarity</i> ).	<p>This comment upholds the need for the continued production of the Action Plan.</p> <p>Such comment was not wholly unexpected given the emerging nature of the associated documentation which provides detail to the approach taken in remediating the effects identified within the HRA Addendum.</p>
HRAREP10	As above	<p>Extract taken from page 13–14 of letter dated 12<sup>th</sup> April: <i>In January 2021, Natural Resources Wales (NRW) published evidence that showed over 60% of riverine Special Areas of Conservation (SAC) waterbodies failed against phosphorus standards. As a result of these failings, NRW issued planning advice to avoid further deterioration in environmental capacity where new developments have the potential to affect phosphorus sensitive riverine SACs and achieve ‘nutrient neutrality’.</i></p>	Representation Acknowledged.
HRAREP11	As above	<i>The advice from NRW relates to riverine SACs whose drainage catchments extend into Carmarthenshire, namely the Afon Teifi, Afon Tywi, Afon Cleddau, River Wye and River Usk. Of these five waterbodies, only two are affected by the proposed housing allocations in the plan draining to either the Afon Teifi or Afon Tywi.</i>	Representation Acknowledged.

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
HRAREP12	As above	<i>The Council has sought to reduce the number of housing allocations in the Afon Tywi to six sites (102 units) and fifteen sites (189 units) in the Afon Teifi. The impact of these reductions has reduced phosphorous levels by 43% and 49% respectively in each of the waterbodies. This reduction, coupled with amendments to Policy CCH4 and the availability of land for potential wetland creation to promote the natural uptake of phosphates in Carmarthenshire, have all been screened as part of the Councils Habitats Regulations Assessment (February 2023) and concluded that the plan will have no adverse effect on the integrity of European sites. The delivery of allocated sites and implementation of long-term mitigation measures is for the statutory bodies of NRW and Welsh Water (WW) to comment in more detail.</i>	Representation Acknowledged.
HRAREP13	Dewi Griffiths [5826]  Dŵr Cymru Welsh Water [1158]	<i>The following extracts were obtained from comments under CCH4, although have boarder relation to the HRA through phosphates: In relation to improving water quality, we are investing an additional £60m specifically to reduce phosphate in the five failing Special Area of Conservation (SAC) rivers in our operating area. This includes schemes at Lampeter and Llanybydder WwTWs that are due for completion by March 2025. In the next investment period 2025 to 2030 (AMP8) we will target investment with the ambition that none of our WwTWs are the cause of ecological failure. Through our phosphorus investment plan, we will have removed 90% of the phosphorus load from our WwTWs discharging to failing SAC rivers, playing our part in allowing these special rivers to meet their water quality targets and to relieve pressure on development restrictions. We expect to complete this programme of work by 2032. Whilst our investment will remove a significant amount of phosphorus from our sewage, in most cases it will not result in SACs complying with the water quality targets on its own. This is not something that Welsh Water can do on its own and it will take the combined efforts of all the contributing sectors to achieve this.</i>	
HRAREP14	As above	<i>We will be engaging with our regulators and local planning authorities through the Tywi and Teifi Nutrient Management Boards (NMB) which can provide the governance, strategic direction and local intelligence/decision making needed if we are to be successful in relieving the pressure on planning restrictions and restoring river quality.</i>	Representation Acknowledged.
HRAREP15	Gayle Lister [5815]  PCNPA [1167]	<i>Extract taken from page 5 of letter dated 11<sup>th</sup> April: Thank you for considering and incorporating PCNPA's comments on the Habitat Regulations Assessment Report (2020) as detailed in the appendices to the Habitats Regulations Assessment Addendum report.</i>	Representation Acknowledged.

Ref	Consultee	Consultee Comment (as italicised)	Response/Action
HRAREP16	As above	<p><i>4.3 Interim action plan – land available for constructed wetlands.</i></p> <p><i>It is suggested that it would be beneficial to include discussion of the identified lands current use (e.g. to eliminate land of existing or other potential nature conservation value from consideration).</i></p> <p><i>Other discussion points:</i></p> <p><i>The long-term use of wetlands as nutrient sinks is not well understood.</i></p> <p><i>The ability of wetlands to remove nutrients may be influenced by climate change scenarios, e.g. drying out, flood events.</i></p>	<p>These outlined considerations will be incorporated into subsequent work.</p> <p>Although this comment does not relate to the HRA itself, it is dealt with accordingly in the Action Plan.</p>
HRAREP17	As above	<p><i>Page 8 (PPP) – while not yet adopted, we note that consultation recently (February 2023) closed on Dŵr Cymru Welsh Water’s draft Water Resources Management Plan 2024</i></p>	<p>Baseline updates.</p> <p>Make changes accordingly.</p>
HRAREP18	As above	<p><i>Typos</i></p> <p><i>“3.2.15 ‘screened out screened out’</i></p> <p><i>3.3.2 ‘unlikely to have a significant effects’</i></p> <p><i>4.2.17 ‘there are important’</i></p> <p><i>4.2.20 ‘which can demonstrate not cause the failure’</i></p> <p><i>4.3.1 ‘ready in conjunction’</i></p>	<p>Officer errors.</p> <p>Make changes accordingly.</p> <p>Reference is made to Ref 64.</p>

In addition to the above responses, NRW also provided comment on two changes to policy wording suggested within the HRA Addendum (INF5 and CCH4). At the time, constraints prevented these from being included within the LDP. It is recommended that these changes are made to these policy to address the concerns originally outlined with the HRA Addendum.



**Page intentionally blank**