
***Appendix 5: Sustainability Appraisal / Strategic
Environmental Assessment (SA/SEA) - Scoping
Report and Initial Report responses***

Appendix 5: SA/SEA Scoping Report – Representations Received

Organisation/Comment	Response/Action
Calon Cymru Network – Patricia Dodd Racher	
General Comments	
A great deal to approve of in this scoping study, especially the determination to accord with the Well-Being of Future Generations (Wales) Act 2015.	Noted
In addition, explicit reference to the Environment (Wales) Act 2016 would be helpful, so that the LDP can be assessed against the minimum emissions reductions specified in the Act.	Accepted. Explicit reference to be added.
Natural Resources Wales – Sharon Luke	
General Comments	
Having reviewed your Draft Scoping Report dated July 2018 we are satisfied with your scope for the SA report. As indicated in the scoping report, you have noted that the SA is an iterative and on-going process. We agree and would add that the SA/SEA should be a live document. This is particularly important when you consider that environmental baseline data is evolving, and other plans and programmes are emerging as a result of new legislation. The SA/SEA should therefore be kept under review throughout the LDP preparation.	Noted – SA/SEA will be reviewed and updated in line with developing baseline data and emerging policy, plans and programmes.
The scope and methodologies proposed for the SA seem reasonable. The scope has identified the likely environmental characteristics effected by the LDP and recognises the existing environmental problems within the LDP area.	Noted
The SA objectives noted in Chapter 6 (SA/SEA framework) and Table 3 of Chapter 5 should provide a robust assessment of environmental impacts from the LDP strategic options.	Noted
We advise that the SA indicators and targets (table 4) seem usable although would recommend the following points are considered. SA Objective 2 Biodiversity SA/SEA Scoping Report - Responses	Accepted. Objective reworded to included reference to connectivity and

<ul style="list-style-type: none"> Objective to promote resilience of ecosystems to encompass avoiding the damage or fragmentation of designated sites, habitats and protected species and to encourage connectivity. 	resilience: <i>2-1 To promote resilience of ecosystems by avoiding the damage or fragmentation of designated sites, habitats and protected species and to encourage connectivity.</i>
SA Objective 3 Air Quality <ul style="list-style-type: none"> Consider the use of improve alongside reduce in objectives 3-1 and 3-2. Include cumulative impacts. 	Accepted. Objectives reworded to read: <i>3-1 To maintain and improve the levels of the UK National Air Quality pollutants</i> <i>3-2 To improve levels of ground level ozone</i>
SA Objective 5 Water <ul style="list-style-type: none"> We advise that Objective 5-5 should also include reducing the impact of flood risk. The decision-making influences could include – Will the LDP reduce/increase the risk of bathing waters reaching Blue Flag status? 	Accepted. Objective reworded to read: <i>5-5 To make space for water, and minimise and reduce flood risk</i>
SA Objective 7 Soil <ul style="list-style-type: none"> The LDP should not increase contamination we would advise this is removed. 	Accepted. Objective reworded to read: <i>7-1 To promote the regeneration of contaminated land.</i>
SA Objective 9 Landscape <ul style="list-style-type: none"> Cumulative impacts should be included. Geological heritage should be included. Areas within Carmarthenshire are in view of the Gower Area of Outstanding Natural Beauty. 	Accepted. Wording of Objective issues and opportunities changed to include reference to cumulative effects, geological heritage and potential trans-boundary impacts with Gower Area of Outstanding Natural Beauty.
Appendix A: Review of relevant plans, policies and programmes	
We would advise that the following are also included.	Accepted. Will add to Appendix A.

<ul style="list-style-type: none"> • Urban Waste Water Treatment Directive 91/271/EEC. • The Groundwater Directive 2006/118/EC. • The Bathing Waters Directive 2006/7/EC. • The Water Resources (Control of Pollution) (Silage, Slurry and Agriculture Fuel Oil) (Wales) ['SSAFO'] Regulations 2010. • Memorandum of understanding for protection of Carmarthen Bay and Estuaries European Marine Site. • Under PPW Technical Advice Note (TAN) 15 we advise you include Chief Planning Officers (CPOs) letter 23/8/16 CL-03-16 Climate change allowances for planning purposes. • Under PPW Technical Advice Note 5 we advise you include CPOs letter 1 March 2018 European Protected Species Licensing – notice of revised procedure. 	
Appendix B: Baseline Information	
<p>The baseline information to be collected appears to be thorough. Please note that NRW have duties under the Environment Act (Wales) 2016 and the Well-being of Future Generations (Wales) Act 2015 which will result in the preparation of further evidence. This evidence should be used in the SA/SEA, if timeframes allow.</p>	<p>Noted. Further baseline information as a result of NRW's duties will be included as and when available.</p>
<p>Chapter 2</p> <p>The River Cleddau Special Area of Conservation should be included under European sites.</p>	<p>The River Cleddau was included in the table of European Sites under paragraph 2.4.</p>
<p>Chapter 3</p> <p>Air Quality consideration should be given to cumulative impacts/effects.</p>	<p>Accepted. Baseline information will be updated to consider cumulative impacts.</p>
<p>Chapter 5</p> <p>In section 5.5 consideration to the proliferation of intensive poultry and pig should be included alongside dairy.</p>	<p>Accepted. Baseline information will be updated to consider poultry and pig farming.</p>

Section 5.6 refers to a map identifying the bathing waters which is not included.	Accepted. Map to be included.
Flood risk – Welsh Government are currently reviewing TAN 15 which should be completed with your timescales. For Section 5.13 Welsh Government have also stated that climate change is to be considered which is not currently mapped	Noted. Baseline will be updated with any new publication of TAN 15.
Other matters to consider	
Drainage infrastructure	Accepted. Section on drainage infrastructure will be included as part of the baseline information.
Memorandum of Understanding requirements for protection of the Carmarthen Bay and Estuaries European Marine Site.	
Prevention of the proliferation of private foul drainage systems by ensuring appropriate infrastructure in areas identified for growth for the protection of water (and soil) quality.	
Opportunities sustainable drainage systems can bring to ecosystems.	
Renewable Energy	Accepted. Section on renewable energy will be included as part of the baseline information.
The Brechfa Forest Strategic Search Area (SSA) G and Pontardawe SSA E.	Noted. Will consider ways to incorporate this into the Deposit SA.
Incorporating a Sustainable management of natural resources (SMNR) approach. SMNR is defined in the Environment Act as “using natural resources in a way and at a rate that maintains and enhances the resilience of ecosystems and the benefits they provide. In doing so, meeting the needs of present generations of people without compromising the ability of future generations to meet their needs, and contributing to the achievement of the well-being goals in the Well-being of Future Generations Act.	

Appendix 9 – Consultation Responses from Initial SA

Organisation/Comment	Response/Action
Natural Resources Wales – Sharon Luke	
General Comments	
We consider that Carmarthenshire’s landscape objective SA 9 links to a greater number of the strategic objectives that defined in Figure 3: Testing of Revised LDP Strategic Objectives against the Sustainability Objectives framework.	Noted. The landscape objective has been reassessed against the strategic objectives and has been linked to all relevant objectives.
Figure 4: Testing of Strategic Growth Options against the sustainability Objectives framework (Page 21). We consider there could be a direct link between growth options and SA9 Landscape. We anticipate that there could be effects e.g. an increased need for greenfield land and pressure on landscapes in a similar way to effects on SA2. There may be potential to mitigate these effects.	Agreed. The figure and supporting text has been amended to reflect impacts of Growth Options on SA2 – Biodiversity.
Section 4.2.1. We note the final bullet point acknowledges the potential to impact negatively on landscapes and cultural heritage.	The paragraph states that all growth has the potential to impact on landscape depending on the selection of sites and implementation of development (e.g. in terms of place making and design, materials used etc.). At the strategic level of detail provided by the preferred strategy is it difficult to say whether there will be negative impacts or not. However, at the deposit stage, there will be more detail on the allocated sites and their landscape context on which to make an assessment.
Figure 7 Testing of Revised LDP Strategic Policies against the Sustainability Objectives framework. We consider some additional strategic policies could have a negative effect on landscape e.g. SP3 and SP6, in a similar way as for biodiversity.	Agreed and amended to more closely reflect the potential impacts on SA2 – Biodiversity.
Figure 8 (page 102) Summary of Sustainability Appraisal of Preferred Strategy. We are not comfortable with the position that the preferred strategy has no negative effect on landscape.	Figure 8 is a summary of all previous sustainability appraisals carried out in the document. It does not conclude that there are no negative effects on

	Landscape, and highlights some potential issues for conflict including SP8, SP12, SP18 and SP19, as well as areas of uncertainty or areas where further information or detail may be required. This figure has now been amended to reflect changes made in other sections of the document as a result of NRW's comments.
Table 8 (page 106) Draft Sustainability Monitoring Framework refers only to Special Landscape Areas in relation to landscape, whereas Appendix 2 Data sources (page 117) refers to the number of developments refused in design grounds and the number approved on previously developed land. We ask for clarification as to the monitoring method used for landscape.	Noted, the additional monitoring data sources have been added to Table 8 to provide a more robust method of monitoring landscape.
Pembrokeshire Coast National Park - Martina Dunne	
Comments on Appraisal of the LDP Strategic Options and Alternatives:	
Spatial Options, appraisal against SA Objective 5. Mitigation for this is effectively now a legislative requirement. SuDS are required for new development under the Flood and Water Management Act (2010). As well as providing mitigation for flash flooding SuDS collect, filter and slowly release water back into the environment.	Agreed, with SuDS now in place, this mitigation is now a legislative requirement and this will be considered as such in the deposit plan.
Comments on Appraisal of LDP Strategic Policies:	
SP6 Employment and the Economy, assessments against SA4. Caveat with "but an increase in industry related traffic as per the commentary on air quality under SA3"	Agreed. Will add in reference to industry related traffic.
General Comments	
On the whole a very balanced assessment, PCNPA support all of the changes to policy suggested by the SA.	Noted.
Missing update/re-issued review of plans and programmes and baseline information. The PPP currently available on the website is missing the	Noted. Will amend deposit plan to include missing LDPs for Pembrokeshire Coast NP and Pembrokeshire CC.

adopted Local Development Plans for Pembrokeshire Coast National Park and Pembrokeshire County Council.	
Suzy Erskine	
General Comments	
<p>2.2.4 The 15 SA Objectives that make up the framework include: ☑ SA2 Biodiversity SA3 Air Quality SA4 Climactic Factors SA5 Water SA7 Soil ☑ SA9 Landscape ☑ SA12 Health and Well-being SA13 Education and Skills SA14 Economy SA15 Social Fabric Regarding the above: Biodiversity is not just about green tourism. If we are to be truly sustainable we could start growing a wider diversity of crops in Wales. Currently only a tiny percentage of farm-land is used for market gardens or fruit trees. We could be growing our own food here and increasing the biodiversity as a result as well as improving the resilience of our local economy and improving people's health. Please let's plant more trees for wildlife, holding water in the soil and enjoying cleaner air. Sheep have been allowed to keep the hillsides bare for so long most people believe that's how they should look. Not so! With trees on the hillsides, our villages won't be flooding, because the trees take up the water and hold on to the soil.</p>	<p>Noted. These are all valid comments which will be considered in the SA of the deposit plan.</p>