



Carmarthenshire County Council

**Initial SA/SEA
Recommendations following Public Consultation**

February 2010

Document control sheet **BPP 04 F8**

Client: Carmarthenshire County Council
 Project: Initial SA/SEA Job No: B0642000
 Document Title: Recommendations following Public Consultation

	Originator	Checked by	Reviewed by	Approved by
ORIGINAL	NAME Jillianne Cross	NAME Scott Johnson	NAME Scott Johnson	NAME Ian Johnson
DATE 8th March 2010	SIGNATURE	SIGNATURE	SIGNATURE	SIGNATURE
Document Status Final				

REVISION	NAME	NAME	NAME	NAME
DATE	SIGNATURE	SIGNATURE	SIGNATURE	SIGNATURE
Document Status				

REVISION	NAME	NAME	NAME	NAME
DATE	SIGNATURE	SIGNATURE	SIGNATURE	SIGNATURE
Document Status				

REVISION	NAME	NAME	NAME	NAME
DATE	SIGNATURE	SIGNATURE	SIGNATURE	SIGNATURE
Document Status				

Jacobs Engineering U.K. Limited

This document has been prepared by a division, subsidiary or affiliate of *Jacobs Engineering U.K. Limited* ("Jacobs") in its professional capacity as consultants in accordance with the terms and conditions of Jacobs' contract with the commissioning party (the "Client"). Regard should be had to those terms and conditions when considering and/or placing any reliance on this document. No part of this document may be copied or reproduced by any means without prior written permission from Jacobs. If you have received this document in error, please destroy all copies in your possession or control and notify Jacobs.

Any advice, opinions, or recommendations within this document (a) should be read and relied upon only in the context of the document as a whole; (b) do not, in any way, purport to include any manner of legal advice or opinion; (c) are based upon the information made available to Jacobs at the date of this document and on current UK standards, codes, technology and construction practices as at the date of this document. It should be noted and it is expressly stated that no independent verification of any of the documents or information supplied to Jacobs has been made. No liability is accepted by Jacobs for any use of this document, other than for the purposes for which it was originally prepared and provided. Following final delivery of this document to the Client, Jacobs will have no further obligations or duty to advise the Client on any matters, including development affecting the information or advice provided in this document.

This document has been prepared for the exclusive use of the Client and unless otherwise agreed in writing by Jacobs, no other party may use, make use of or rely on the contents of this document. Should the Client wish to release this document to a third party, Jacobs may, at its discretion, agree to such release provided that (a) Jacobs' written agreement is obtained prior to such release; and (b) by release of the document to the third party, that third party does not acquire any rights, contractual or otherwise, whatsoever against Jacobs and Jacobs, accordingly, assume no duties, liabilities or obligations to that third party; and (c) Jacobs accepts no responsibility for any loss or damage incurred by the Client or for any conflict of Jacobs' interests arising out of the Client's release of this document to the third party.

Contents

1	Recommendations following Public Consultation	1
1.1	Introduction	1
1.2	Recommendations	1
	SAP001	1
	SAP002	1
	SAP003	1
	SAP004	1
	SAP005	2
	SAP006	2
	SAP007	2
	SAP008	2
	SAP009	2
	SAP010	3
	SAP011	3
	SAP012	3
	SAP013	3
	SAP014 to SAP026 inclusive	4
	SAP027	5
	SAP028	5
	SAP029	6
	SAP030	7
	SAP031	7
	SAP032	8
	SAP033	9
	SAP034	9
	SAP035	10
	SAP036	10
	SAP037	10
	SAP038	11
	SAP039	12
	SAP040	12
	SAP041	13

1 Recommendations following Public Consultation

1.1 Introduction

Carmarthen County Council completed the public consultation of the Preferred Strategy on the 04 Jan 2010. This included the Initial SA/SEA Report.

This report sets out the recommendations for dealing with each response in turn. However, it is not recommended that Carmarthenshire amend and reissue the Initial SA/SEA Report, but ensure that the responses received are taken on board within the next stages of the SA/SEA process.

1.2 Recommendations

Reference	SAP001
Respondent	Ms Louise Edwards
Organisation	Environment Agency Wales
Response	The layout is not really helpful as the LDP objectives on the A3 pages do not continue over the page. There should be page numbers and paragraph references.
Recommendation	Note this response. The SA/SEA Environmental Report will include tables where the header rows appear at the top of each page. Clear page numbering and paragraph references will also be used.

Reference	SAP002
Respondent	Ms Louise Edwards
Organisation	Environment Agency Wales
Response	As stated in our previous response of 09 October 2008, sustainability objective 5.5 must also include surface water flooding.
Recommendation	Note this response. The SA/SEA Environmental Report will include surface water flooding as a key issue and SAO 5.5 will be updated.

Reference	SAP003
Respondent	Ms Louise Edwards
Organisation	Environment Agency Wales
Response	Chapter 2, the 2nd draft strategic objectives include some positive changes. We are happy that 2b includes "land which has been suitably remediated".
Recommendation	No recommendation required.

Reference	SAP004
Respondent	Ms Louise Edwards
Organisation	Environment Agency Wales
Response	Sustainability objective 4 also now includes that species and habitats are protected and sustainability 11 includes foul and surface water infrastructural requirements.
Recommendation	No recommendation required.

Reference	SAP005
Respondent	Ms Louise Edwards
Organisation	Environment Agency Wales
Response	Section 4.1 SA/SEA sustainability objective 4 - Climatic Factors, under the section entitled "other sources of policy controls (internal & external)" there should be reference to the surface water flooding maps.
Recommendation	Note this response. The SA/SEA Environmental Report will include reference to the surface water flooding maps.

Reference	SAP006
Respondent	Ms Louise Edwards
Organisation	Environment Agency Wales
Response	Chapter 4.2, Summary of Assessment - we are concerned that there are potential tensions with the SA/SEA objectives intended to protect or enhance the natural environment, your Authority must ensure that there are stringent polices within the LDP to overcome any issues.
Recommendation	Note this response. The SA/SEA initial assessment is intended to inform the following iteration of the Preferred Strategy updated with the recommendations of the initial SA/SEA and the drafting of the LDP policies. The SA/SEA Environmental Report will set out any additional mitigation measures and monitoring framework.

Reference	SAP007
Respondent	Ms Louise Edwards
Organisation	Environment Agency Wales
Response	Chapter 4.2, paragraph 4.3.4 Water - you refer to a "water cycle study" we were unaware that your Authority was undertaking this study, we therefore request to see details of the study and the intended outcomes, as the Water Framework Directive should play a big part in this process.
Recommendation	Note this response. CCC to update EA on progress on the SFCA and Water Cycle Study progress.

Reference	SAP008
Respondent	Mr Bryan Graham
Organisation	City & County of Swansea
Response	The assessment fails to examine cross-boundary effects of the proposed policies. No mention is made of the City and County of Swansea Unitary Development Plan, the Pembrokeshire Joint Unitary Development Plan nor the Powys Unitary Development Plan. The assessment also fails to discuss the probability, duration, magnitude and spatial extent of the effects. It is acknowledged that the degree of assessment is limited due to the strategic nature of this stage of the LDP, but some recognition of the potential effects is expected, in order to ensure that Schedule 1.2 of the SEA Regs are met.
Recommendation	Note this response. The SA/SEA Environmental Report will include an assessment of cross-boundary effects and will ensure compliance with the SEA Regulations.

Reference	SAP009
Respondent	Mr Bryan Graham
Organisation	City & County of Swansea

Response	Support the SA/SEA Initial Report, however the document was not easy to navigate around and it would be beneficial to have an index. Additionally the tables could be numbered and given headings and the sections/paragraphs could be formatted consistently, including numbering.
Recommendation	Note this response. The full SA/SEA Environmental Report will include clear page numbering, paragraph references and table numbering/titles. It will be supported by a full Table of Contents.

Reference	SAP010
Respondent	Mr Bryan Graham
Organisation	City & County of Swansea
Response	However, clarification is sought in relation to assessment option 1, on the use and meaning of the word 'greenbelt' (Objective 2, Biodiversity).
Recommendation	Note this response. Amendment and clarification to be added to the SA/SEA Environmental Report to relate to 'previously undeveloped sites/greenfield sites' rather than 'greenbelt' specifically.

Reference	SAP011
Respondent	Mr Bryan Graham
Organisation	City & County of Swansea
Response	Support, however would recommend that the following are added under 1 Sustainable Development 'Other sources of policy controls': SP10 - MTAN2 Coal and the Regional Technical Statement for South Wales Aggregates Working Party and SP12: The South West Wales Regional Waste Plan First Review.
Recommendation	Note this response. The recommended documents will be reviewed and taken account of in the assessment in the SA/SEA Environmental Report as appropriate.

Reference	SAP012
Respondent	Mark Newey
Organisation	Welsh Assembly Government
Response	<p>We note that the Preferred Strategy has been subject to SA/SEA: supporting documentation (Jacobs) 'Sustainability Appraisal/ SEA Initial Report' (Nov09) (ISAR) – includes the environmental report - subject of current consultation. (+ SA/SEA Scoping Report Sep08). Strategic objectives, options and policies have been assessed.</p> <p>It is vital that the authority is able to demonstrate that it has followed the correct procedure outlined in the SEA Regulations, the Habitats Regulations, has had regard to European Protected Species and that the deposit plan has had regard to the findings.</p> <p>Correct reference should be made to the Wales SEA Regulations and to the Habitats Regulations which transpose the requirements of the SEA Directive and the Habitats Directive respectively</p>
Recommendation	The full SA/SEA Environmental Report will be updated in order to better demonstrate full compliance with the SEA and Habitats Regulations.

Reference	SAP013
Respondent	James Green
Organisation	Not specified.

Response	<p>Rural acknowledgement, throughout the pre-deposit strategy plan there is no real knowledge or understanding of the rural communities. They are mentioned more as an after thought and to be kept static as some 19th Century folly for visiting tourist. Carmarthenshire is approximately 70% rural with 40% of the population, but the sustainable principles set forward in the document negates these facts. The rural community is dying due the lack of new quality affordable homes, for generations local families have live and worked within a small clustered areas, as Carmarthenshire population is now ageing and living longer, there is a clear lack of additional houses, which is forcing younger generations to leave and move away to what is seemed more sustainable settlements. The now negated rural communities were once until very recently thriving sustainable communities. Once the younger generation move away there is the inevitable closures to school, post offices, and shops, all due to recent misunderstanding and misguidance in local planning policies, doing nothing is not sustainability.</p> <p>Current policies and potential strategies do not really address the rural communities, there needs to be a separate and clearly defined section specifically dealing with regenerating and sustaining rural communities, not in terms of business or tourism but for residential. Yes there should be a priority with settlement with greater transport links, but not at the expense and neglect of other communities. Reading through the documents, there is overall soundness and progressive thinking, with great buzz words, but it all comes down to interpretation and follow-through. Current development standards in the County are very poor and non constant. There needs to be progression not 19th Century ideologies.</p>
Recommendation	<p>Note this response. CCC and Jacobs to discuss the way rural issues can be can be effectively addressed in the LDP. Recommend that the SA/SEA Environmental Report is updated to reflect these as key issues and that they are drawn out in the assessment work.</p>

Reference	SAP014 to SAP026 inclusive
Respondent	Mrs Suzanne Davies
Organisation	Whitland Town Council
Response	<p>Whitland Town Council have reservation about site allocations with reference to the following issues:-</p> <ul style="list-style-type: none"> • Floodplain • Sewerage capacity • Disposal of water including flood • Infrastructure • Employment/Industry • Amenities • Road access • Disability access • Outside the present JUDP
Recommendation	<p>The responses are all in relation to proposed candidate sites and are not specific to the SA/SEA initial report. The LDP and SA/SEA process going forward should consider that these proposed candidates sites may have adverse effects for the reasons listed in the response, and policies or specific land use allocations may avoid or reduce the effects.</p>

Reference	SAP027
Respondent	Mr Del Phillips
Organisation	Not specified.
Response	<p>Whilst I acknowledge that the SA produced in advance of this LDP has been published, the SEA is conspicuous by its absence. Any responsible forward planning should have looked at all aspects of infrastructure provision and at the pace of development required within Carmarthenshire.</p> <p>I have a copy of the published report from CCC Forward Planning where it stated that once the relevant sites had been identified each one would undergo a SEA. I was taken aback as the SEA is required as a guide to the formulation of the Plan and an EIA for each individual site, if appropriate. Therefore, the LDP process has been compromised.</p> <p>In addition to the above, if a proper assessment of infrastructure had been carried out, deficiencies in transport and sewage disposal would have been readily identified.</p> <p>It is also noteworthy that a large percentage of the candidate sites for the LDP are on GREEN FIELD sites and do not accord with WAG or CCC policy.</p> <p>As the UDP requirement for housing to the year 2016 was exceeded during 2007-8, it appears that the Local Planning Authority has ignored the requirement for 'phasing' of development over the plan period. As such this has exacerbated the infrastructure deficiencies which continue to cause such controversy.</p> <p>As an example of the failure to provide the necessary infrastructure I attach for your information an extract from a report by Dr Keil Lewis of DCWW in their submission to OFWAT. The graph depicts the likely timescale for the legally necessary treatment of sewage to start to improve.</p> <p>I could go on but I will save further comment for a future date.</p>
Recommendation	Note this response. It should be noted that SEA is incorporated into SA, and that the SA/SEA will assess strategic site allocations as appropriate. EIA occurs at the detailed project design stage. The issue of phasing will be further considered as part of the Deposit LDP and will consequently be considered as part of the SA/SEA process. CCC and Jacobs will discuss the way these and the remaining issues can be effectively addressed in the LDP and SA/SEA process and site assessment work.

Reference	SAP028
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>The local authority must satisfy itself that it has adequately addressed the issue of alternatives, particularly given the potential implications of the Plan, as highlighted in the HRA, in relation to possible impacts on the Burry inlet SPA, Carmarthen Bay SAC etc. Alternatives must be realistic and reflect the range of alternative scenarios that could effectively deliver the plan. It is not necessary that all growth scenarios are presented or assessed but where only one growth expression has been put forward for assessment (even</p>

	with low/high margins of error) then care must be taken to ensure that a firm justification is given why alternative growth levels have not been considered. It may not be acceptable to assume that because national policy advocates a particular level of housing growth that alternative lower (or even higher) growth scenarios should not be considered if only to identify where significant environmental effects are likely to manifest themselves and highlight potential mitigation measures.
Recommendation	<p>Note this response. Jacobs and CCC to discuss the future stages of HRA (which informs the SA/SEA) and also the alternative growth scenarios behind the preferred Strategic Option (Sustainable Distribution) that can be subject to SA/SEA. It will be important to understand CCW's concerns regarding growth levels and any capacity constraints (e.g. abstraction, sewage treatment). Links to any other studies will be of high value to the HRA and SA/SEA.</p> <p>We are currently at HRA Screening, and there is still significant potential for the remaining stages of HRA to inform the LDP. The HRA itself has not assessed the alternatives, however there is a possibility that the preferred option will raise issues in HRA terms; though it is likely that growth scenarios play the bigger part. Jacobs/CCC need to understand what infrastructure could require mitigation, and looking at the 'worst case' growth scenario might be helpful.</p> <p>Where applicable, the SA/SEA will revisit options in light of the HRA and growth scenario considerations for the preferred option. Consideration will be given to the utilisation of the HRA to look at growth scenarios and effects upon European sites in particular to inform the LDP.</p>

Reference	SAP029
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>Given the issues in the Llanelli and Cross Hands area with regard to water quality and biodiversity, respectively, we wish to see more evidence of critical consideration of the effectiveness of implementing the preferred strategy. The levels of growth proposed in these two areas is high and while it may be possible to phase development over the lifespan of the LDP, we are aware that current discussions, particularly around sewage infrastructure in Llanelli, are only concerned with the level of housing growth as documented in the UDP. Therefore, we believe that further consideration of the impacts of the additional approximately 2000 houses proposed in the LDP is required to fully assess the impacts of the plan through the SEA process. We also strongly advise you to cross reference this section with the findings of the Habitats Regulations Assessment in relation to likely significant effects on the Burry Inlet SPA and Carmarthen Bay SAC and potentially other European and international sites.</p> <p>We note that comments are made in respect to the impacts on the water environment, specifically on page 14 that 'it is assumed that provisions will be implemented to ensure that adequate water supplies and sewage disposal capacities are available, that new development is water neutral and that development avoids flood risk zones as part of normal planning procedures'. We would like to see more detail on these provisions or clearer indications that these mitigation measures will be incorporated into the Plan before we can be confident that the assessment of a minor positive effect is a</p>

	reasonable one.
Recommendation	<p>Note this response. Agree to recommend referring to the HRA for specific detail on sites where there may be increased pressures on European sites. This issue is not drawn out in the assessment given that the implementation of SP3 and SP4 would be moderated by SP14 that clarifies that development would not be permitted where the impacts upon European sites would be unacceptable.</p> <p>However it is agreed that further work could be undertaken to evaluate the opportunities for reducing these potential impacts at a higher stage in the development process through additional policy controls, for example by stipulating that the cross-authority WCS would need to include sewage infrastructure as a key component.</p> <p>Jacobs and CCC to discuss the studies undertaken to establish the linkages between pressures on sewage infrastructure and that status of the European sites.</p> <p>Jacobs and CCC to discuss the SA of site allocations in more detail to cross-refer the conclusions of this work/expand on the assessment of site allocations in the SA/SEA.</p>

Reference	SAP030
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>We have some concerns that this document does not include all of the sections required of the Environment Report, as listed in the Regulations. We appreciate that this document is intended to sit alongside the Scoping Report (Stage A - September 2008) and will include additional elements in it's final form but this is not made clear and the two documents together do not constitute a full Environment Report (for example there is no consideration of the monitoring framework). We would welcome clarification as to why this is the case, and look forward to being consulted on the complete report, including an assessment of the deposit plan policies and a monitoring strategy at the appropriate time.</p>
Recommendation	<p>Note this response. CCC provided the Scoping Report and SAR on the same webpage and made it clear that this is the baseline used to inform the assessment.</p> <p>CCW have since confirmed that they would not have expected to see a full SA/SEA report at this stage in the LDP development. A full SA/SEA ER will be prepared and consulted upon before the development of the draft Deposit LDP that will be updated and refined as the LDP policies develop. As part of the additional assessment work that is likely to be required following the revision of growth options and strategic policies. Jacobs propose to update the SR and assessment work to compile a draft/preliminary SA/SEA Environmental Report.</p>

Reference	SAP031
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>Incorporation of assessment recommendations into the LDP preferred strategy.</p> <p>We believe that there are many aspects of the SEA assessment that should be incorporated into the preferred strategy. In particular, there are many valid and valuable recommendations to enhance the</p>

	<p>wording of the Strategic Policies (SP), such as inclusion of a minimum compensatory habitat requirement into SP1, and including reference to habitat corridors into SP14. We are therefore disappointed that the preferred strategy consultation document has not included these suggestions and, instead, quotes the original SP as it was before the assessment. As you are aware, the SEA process is designed to be iterative and to 'contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'. We would therefore expect to see several, if not all, of the wording changes included in the consultation document on the preferred strategy, or if not, some explanation as to why these recommendations have not been taken up.</p> <p>In addition, it is our view that the assessment of the spatial options does not show that the preferred option will be particularly positive in terms of sustainable development, with most of the assessment concluding a minor positive effect at best. Therefore, we would encourage you to include recommendations for further enhancement in the SP to improve the overall assessment of the preferred strategy and make it more compliant with the spirit of the SEA Directive. Without consideration of the recommendations, we have serious concerns about the adequacy of this element of the assessment. The Local Authority must satisfy itself that it has fully considered the significant environmental effects of the preferred spatial options and strategic policies and adequately covered the range of mitigation measures needed to avoid, cancel and/or reduce these effects. It must also ensure that the measures identified are incorporated into the Plan itself.</p>
Recommendation	<p>Note this response. During the revisiting of the assessment of the Strategic Policies Jacobs will consider additional mitigation or control measures to try to secure improvements to the natural environment through the LDP. The Preferred Strategy will be revised and updated to incorporate the comments/recommendations raised in the SA/SEA Initial Report.</p>

Reference	SAP032
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>Studies to inform the assessment</p> <p>We strongly support the efforts of the local authority to undertake Strategic Flood Consequence Assessments and Water Cycle studies (WCS). Even though we understand these are limited in spatial scope at the moment, we commend the Council on using these tools to plan appropriately for proposed future development.</p> <p>Similarly, we are strongly in favour of the work the Council is undertaking on assessing and documenting ecological connectivity within the settlements in the county. We feel that this is a key element of the Plan's baseline research which will give future development a firm ecological basis and are therefore both surprised and disappointed not to see this concept explained in the SP on natural environment (SP14).</p> <p>Proposed inclusions of this work into SP14 as detailed in table 2.1 (page 25) are recommended in the assessment and we strongly supported this. We suggest use of the term 'connections' in preference of 'corridors' as this can be used to represent a variety of habitat features.</p>

Recommendation	<p>Note this response. The SfCA and WCS were not well-developed at the time of undertaking the assessment work. Consideration is being given as to the most appropriate approach for taking forward a WCS. It may be more appropriate to undertake any WCS work at a cross border level via a collaborative approach with neighbouring Authorities.</p> <p>Jacobs and CCC to review progress on these elements and establish whether they can be effectively built into the LDP and SA/SEA.</p> <p>Jacobs to review the Habitat Connections work undertaken by CCC (Central Wales Settlement Strategy included a map of habitat corridors/connections).</p>
-----------------------	---

Reference	SAP033
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>Previous comments made on the scoping document. We are disappointed that our comments on the previous consultation (Scoping Report October 2008) have not been included into a revised scoping report, and that the response document merely states that the Council's response is 'that the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process'. Consultations and their responses take time to undertake, as we are sure you will appreciate, and it is come to be normal practice to either address our comments in a revised scoping report, or to document why comments have not been incorporated. We therefore assume that this will be addressed in future iterations of the SEA and incorporated in the final Environment Report, as per Annex 1 of the SEA Directive.</p>
Recommendation	<p>Note this response. The comments raised by CCW have been taken forwards to the SAR and this will be prepared as a draft to accompany the Preferred Strategy. A matrix will be included in the SAR demonstrating where changes have been made.</p>

Reference	SAP034
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>Sustainability Appraisals of related plans and strategies</p> <p>We note within the preferred strategy document that reference is made to a number of other plans and strategies that will have an impact on the LDP. While we commend this inclusive approach, we raise a note of caution that any specific policies or actions adopted from these plans and strategies, need to be considered as part of this SA/SEA. It should not be taken for granted that these policies or actions have been independently assessed as part of their own SA/SEA, and we can highlight the Rural Development Plan and Tourism Vision for Carmarthenshire as two examples where SEA has not been undertaken. Even if this is the case, the SEA of the other plan may not have considered any 'in combination', cumulative or synergistic effects in relation to the Carmarthenshire LDP. It is worth identifying clearly within the LDP documents which elements of the preferred strategy are derived from these other plans and strategies so that these can be clearly cross-referenced to the SA/SEA assessment.</p>
Recommendation	<p>Note this response. CCC and Jacobs to discuss these elements and draw out the policies that may not have been subject to SA/SEA and</p>

	ensure that these are covered adequately in SA/SEA and particularly in the cumulative effects assessment and mitigation and monitoring measures secured for any such 'uncertain' / 'un-tested' effects.
--	---

Reference	SAP035
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	We are pleased to see the proposal to limit the use of finite resources in the implementation of the LDP (see SEA objective 6 on material assets). In furthering this aim, we would draw your attention to a study looking at the long term sustainability of licensed gravel extraction practices in the Tywi valley, commissioned by CCWI and carried out by the University of Wales Aberystwyth, which is due to be published shortly. This information will help to inform both the Habitats Regulations Assessment and the rationale for the use of extracted materials from this source within the LDP.
Recommendation	Note this response. Jacobs to incorporate the conclusions/implications of this study into the Environmental Report if it is possible to be provided.

Reference	SAP036
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	Air quality assessment We understand that air quality is a real and current issue around Cross Hands. This is referred to in the SEA for the Regional Transport Plan prepared by SWWITCH, which states that 'building new road infrastructure is likely to result in an increase in vehicle traffic with associated negative environmental effects'. This issue is also alluded to in section 4.3.2 of this report in reference to a potential breach of standards due to traffic emissions in the next five years. While this does not presume a definite breach in the national air quality objectives, it is a worrying trend and raises issues about the impacts of proposals to develop Cross Hands, particularly in relation to increased traffic loads given the lack of public transport provision in the area. We would therefore recommend that you to look again at the assessment for air quality within this report (page 13) and cross-reference to the accompanying HRA report. The conclusion of a positive effect on air quality resulting from the preferred strategy may need to be reconsidered in the light of these studies.
Recommendation	Note this response. Jacobs to revisit this element of the assessment work and ensure cross-reference with the HRA report.

Reference	SAP037
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	Water quality/resources. Please note our above comments in relation to our concerns on the practicalities of implementing the preferred strategy within the context of ongoing discussions about sewerage infrastructure capacity affecting the Burry Inlet SAC. On the basis of ongoing development proposals, Carmarthenshire County Council is already aware that a clear understanding is required of the relationship between water treatment works, drainage area networks and international or European sites.

	<p>Specific local issues should be considered through the LDP process, particularly within this SA/SEA, but "in combination" issues should be considered at the Regional/National Level as well.</p> <p>The Authority should link delivery of all new development (housing and employment) with a review of the capacity of Sewage Treatment Works (STWs) and sewerage infrastructure and work with the water companies to identify improvements to these to ensure water quality in the European or international sites is not compromised. This should be based on the increased growth figures set out in the LDP preferred strategy and not on the figures set out in the UDP.</p> <p>In relation to water resources, Carmarthenshire should continue to engage in consultation with water companies, the Environment Agency and CCW on proposed allocations to enable development to be appropriately located and phased, for example within Water Resource Zones where a sustainable water supply is available and can be secured without adverse effects upon a European site. Development should be avoided where a water deficit has been identified, particularly where there are potential likely significant effects on a European site(s).</p> <p>If this information is not currently available, we would encourage the local authority to consider expanding their existing Water Cycle Study baseline work by carrying out an investigation appropriate to the issues raised in the Water Resources Management Plan and LDP. The information that such a study could provide should also enable consideration of alternative distributions and phasing of development to ensure that the Plan will not be proposing development of such a scale or in a location that will result in adverse effects on the environment and once again, particularly any European sites.</p>
<p>Recommendation</p>	<p>Note this response. CCC and Jacobs to discuss approach to WCS and the LDP and SA/SEA. Jacobs to revisit this element of the initial SA/SEA assessment work and cross-reference with the HRA. We will revisit how local issues are considered in the assessment.</p> <p>Additional mitigation/qualifying policy wording to be recommended that is associated with sewage treatment/connection requirements, drainage utilities/ capacity connection statements. Jacobs will revisit the baseline water stress classification maps, WRMP and Review of Consents work.</p> <p>Jacobs are to link both the SA/SEA and HRA more effectively with other ongoing and emerging studies. Jacobs and CCC are to consider whether SA/SEA needs a 'finer tuned' consideration of the CAMS mapping and RBMP results – potentially overlapping growth with water resource capacity more closely.</p>

<p>Reference</p>	<p>SAP038</p>
<p>Respondent</p>	<p>Rhian Jardine</p>
<p>Organisation</p>	<p>Countryside Council for Wales</p>
<p>Response</p>	<p>If adverse effects cannot be prevented through avoidance, then the Carmarthenshire County council would need to show how it might mitigate any potential impacts so that no adverse effect on the integrity of any European site will occur (alone or in combination with other plans and projects). This may require policy wording similar to that set out in the EIP Report on the West Midlands RSS Phase 2, where the Inspector suggested that; in exceptional</p>

	<p>circumstances, actual housing allocations may need to be adjusted to fit the available resources.</p> <p>It there is sufficient confidence that the proposed growth in the initial period of the Plan can be accommodated without any significant environmental effects (or likely significant effects in relation to European sites), then it may be possible to carry out this work as part of a wider study including neighbouring authorities over the first review period of the Plan. Detailed monitoring of both of the performance of relevant water conservation policies and the delivery of development will need to be included as part of the monitoring framework.</p> <p>Where there is any doubt, the Plan should contain suitable policies, caveats and conditions to ensure that any development is conditional on adequate water treatment infrastructure and assured and sustainable water supplies from sources that proposed development will not have any adverse effects on European sites.</p>
Recommendation	<p>Note this response. Jacobs and CCC to discuss the future stages of HRA (which informs the SA/SEA) and also the alternative growth scenarios behind the preferred Strategic Option (Sustainable Distribution). It will be important to understand CCW's concerns regarding growth levels and any capacity constraints (e.g. abstraction, sewage treatment). Links to any other studies will be of high value to the HRA and SA/SEA.</p> <p>We are currently at HRA Screening, and there is still significant potential for the remaining stages of HRA to inform the LDP. The HRA itself has not assessed the alternatives, however there is a possibility that the preferred option will raise issues in HRA terms; though it is likely that growth scenarios play the bigger part. Jacobs/CCC need to understand what infrastructure could require mitigation, and looking at the 'worst case' growth scenario might be helpful.</p> <p>The SA/SEA should revisit options in light of the HRA and growth scenario considerations. The HRA could be expanded to look at growth scenarios and effects upon European sites in particular to inform the LDP.</p>

Reference	SAP039
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>You should also be aware that ongoing Environment Agency Review of Consents (RoC) work on the abstraction licences on the river Tywi are very likely to result in amendments to licences, in terms of the amount and frequency of abstraction.</p> <p>We suggest that once this information is confirmed, further discussions take place with the Environment Agency and Dwr Cymru about likely implications for the delivery of the LDP.</p>
Recommendation	Note this response. Jacobss/CCC to discuss these implications with the Environment Agency and Dwr Cymru on the LDP.

Reference	SAP040
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales

Response	Section 4.3.4 We welcome the suggestions to improve SP14 and SP17, but it appears that the final sentence of the second paragraph is incomplete.
Recommendation	Note this response. Jacobs/CCC to ensure this is amended during the preparation of the full SA/SEA Report.

Reference	SAP041
Respondent	Rhian Jardine
Organisation	Countryside Council for Wales
Response	<p>Overall ratings</p> <p>As is common practice, a concluding mark is given to represent a 'score' for the individual Strategic Policies against each of the SA/SEA objectives. In many cases, this mark is a question mark '?', which the text states denotes a lack of certainty about the additive nature of positive and negative effects. We do not feel that this is wholly adequate and could lead to the reader misinterpreting the assessment, either by judging the assessment to be inconclusive or incomplete. It is not adequate to assume an additive nature to positive and negative effects, as quite rightly pointed out in the report, but the use of a question mark is not adequate either. Given the frequent occasions that this mark is used within the assessment, we expect some attempt to qualify the negative and positive aspects of each type of effect, or to use a different method of summarising the effects. We suggest that changes to the objectives may be one way to deal with this issue, but understand that this may not be possible given the current stage of the Plan and look forward to discussing alternatives approaches to address these concerns.</p>
Recommendation	<p>Note this response. Jacobs to discuss with CCC and CCW how to address uncertainty, and use the existing agreed/consulted upon scope and method moving forward. Recommend the draft SAR addresses some of these problems and amends the "?" score to include the 'worst case' (i.e. use the precautionary principle) and also include a means of assessing uncertainty or describing areas of uncertainty.</p> <p>Jacobs to discuss with CCW that the SA/SEA Objective 1 is difficult to assess with certainty (the objective where most of the '?' are used/where uncertainty over the direction of the assessment). Jacobs to ensure future assessment work includes an explanation as to why a balanced approach has been arrived at. The factors/baseline used under each SA Objective could need to be defined more clearly for SA/SEA Objective 1, and potentially for others. Jacobs to assume 'worst case' where there is uncertainty when value judgements about the overall effects of a policy are being made.</p>