

Ref: SAS0001 Respondent: Ms Isabel Macho
Carmarthenshire County Council

Agent (where used):

11. Any other comments?

Answer: General

Shouldn't any appraisal/assessment identify how the Plan's proposals/policies will potentially impact biodiversity (and climate change)? In Section 4 it states in the table that biodiversity must be protected and enhanced and has objectives to do just that and also to avoid damage and fragmentation. However shouldn't the document also list just how biodiversity could be impacted upon by the various types of development (e.g. buildings, roads)? As well as these direct impacts, should indirect impacts also be considered? At the moment there doesn't seem to be much appraisal or assessment of the type impacts the LDP may cause.

NERC Act 2006 – a section on the NERC Act and the duty it imposes on public bodies should be included. The list of species and habitats listed under Section 42 of the NERC Act 2006 should also be mentioned and the fact these species and habitats are of principal importance to the conservation of biodiversity in Wales. The NERC Act places a duty on all public bodies to have regard to the conservation of biodiversity in all its functions, which obviously includes the preparation of the LDP.

The plan needs to be assessed under Habs Regs 1994, with regard to impacts on the SACs. After a screening process an Appropriate Assessment/s will be required. This should run in parallel with the SEA/SA process.

Specific comments

p 2 - 1.2 The Carmarthenshire Local Development Plan

Last para – remove 's' from statement 'whilst conserving the natural environments'.

p.6 - 2.1 General

Ramsar Convention (1971) should be added to list of International/European Conventions

The following should all be added to the UK legislation

Wildlife & Countryside Act 1981 (as amended)

Conservation (Natural Habitats &c.) Regulations 1994 (as amended 2007)

Countryside and Rights of Way Act 2000

Natural Environment and Rural Communities Act 2006 (NERC Act)

p.8 - Under Local/Carmarthenshire the date of the Carmarthenshire Biodiversity Action Plan should be 2000 NOT 2007. A statement should be added that it is to be revised in 2009.

p.12 - in the Sustainable Development section (3.2) it lists the strategic priorities within the Council's SD Strategy. Is there not a priority concerning the natural environment??

3.3 Biodiversity

General comment on this section. This section's description of biodiversity does not consider the importance of the wider biodiversity resource within Carmarthenshire OUTSIDE designated and the benefits it brings us. It concentrates on designated sites, but must highlight the rich range of biodiversity outside designated sites. Biodiversity also provides us with a range of goods and services: clean air, clean water, coastal food protection, is an important influence on our culture, attracts tourism and provides a landscape setting for our settlements, etc, etc.

Biodiversity in the wider countryside links important habitats, providing wildlife corridors that will help alleviate the impact of climate change by allowing the movement of species.

p.12 – remove 's' from Ramsar sites.

p.13 – Table 3.1 Cwm Doethie not Cwm Doethiei

p.15 – third para. Add full stop after National Park and start next sentence 'These are designated under...', and deleting 'that'.

- fifth para. Add Cors Goch to the list of NNRs.

- seventh para. Glan yr Afon not Glan yr afon

- eighth para on SINC's. This para is misleading as it gives the impression that there is no habitat worthy of designation. The council have adopted the principle of SINC's and adopted the criteria for their designation. There is a policy within the UDP to support SINC's. The constraint to the designation of SINC's is resources - both human and financial. We need to address this as there are certainly sites worthy of designation.

3.3.1 Carmarthenshire LOCAL Biodiversity Action Plan

- first para. The first sentence should more accurately read 'The following species are the subject of action plans within the current Carmarthenshire LBAP. This plan is being revised and updated in light of a review of the UK priority habitats and species.'

- list of habitats and species.

Species – please delete: black grouse, high-brown fritillary, pearl-bordered fritillary, golden plover

Species – please add: Black poplar, Harbour Porpoise; Nightjar; Pennyroyal.

Species – please correct: Brown hairstreak; Pipistrelle and other bats

Habitats – please add: Coastal vegetated shingle; Post-industrial and brownfield sites; Rivers and streams; Maritime cliff and slope.

Habitats – please delete: the species marsh fritillary and pipistrelle bat.

Section 4. Key issues and challenges

2- Biodiversity

Revision of first two sentences to: "Carmarthenshire has a rich biodiversity resource, including specific sites of biodiversity value with designations ranging from the international to the local level. These sites need..."

A sentence along these lines should be added. Development, both directly through loss and fragmentation of habitat, and indirectly through, for e.g. adverse hydrological effects, visual and noise impacts on species, increasing the impact of climate change, will have a negative impact on biodiversity.

Source: Add reference to LBAP, UKBAP and Section 42 list

SA Objectives: 2-2 change to "To protect, enhance and create appropriate wildlife habitats and wildlife corridors in urban and rural areas."

Section 5. Developing the SA/SEA Framework

2- Biodiversity

2-2 – change to "To protect, enhance and create appropriate wildlife habitats and wildlife corridors in urban and rural areas."

Indicators - change to "% of SAC and SSSI sites and their features in favourable condition".

Decision Making Criteria – Add a criterion "Are there any BAP/Section 42 habitats/species that may be affected by the LDP?"

Section 9 should include reference to all the policy/legislation that was missing from Section 2.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0002 **Respondent:** Mrs Suzanne Whiting **Agent (where used):**
Cadw

11. Any other comments?

Answer: Table 1 page iii (Cultural Heritage)
There is no reference in the section to Historic Parks and Gardens, consider rewording Decision-Making Criteria to read "Are there any historic landscapes or historic parks and gardens that can be positively or negatively affected by the LDP?", or including an additional question to cover parks and gardens.
Baseline Data: Section 3
Cultural Heritage and Historic Environment (p.28)
There is a significant omission in this section with the absence of any reference to Listed Buildings. Baseline information on the number and grade of listed buildings in the County should be included here.
It should also be noted with regard to Scheduled Ancient Monuments that these represent only the top percentage of archaeological and historic sites within Carmarthenshire. The text should include reference to the numbers of non-scheduled known archaeological resource (which can be obtained via the regional Historic Environment Record held by the Dyfed Archaeological Trust). This would give a clearer baseline indication of the overall quality of the Historic Environment within Carmarthenshire. Also, p28 – second list of Conservation Areas should refer to Carmarthen (town) not Carmarthenshire.
Cultural Heritage (p.45)
Indicators: Cadw can assist the Local Authority in carrying out an objective assessment of the

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improvement/deterioration of monuments in the ownership of the Council but this information is not provided within the document referred to in the text. This paragraph should be reworded to read

“Improvement/deterioration in the condition of monuments and historic buildings in the ownership of Carmarthenshire County Council” and internal processes should be put in place to capture this information to support the SEA.

Decision Making Criteria: Add “Are there any registered parks and gardens that can be positively or negatively affected by the LDP?”

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0003 **Respondent:** Mr David Watkins
Environment Agency Wales

Agent (where used):

01. Are there any other relevant policies, plans and programmes that have not been identified?

Answer: Appears to be omission of reference to Planning Policy Wales (PPW) in setting the policy context. Scoping report ref: para 2.1 onwards page 6

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

02. Do you have, or know of, any additional relevant baseline information which should be added to that already listed?

Answer: Access to EAW baseline material via website

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

03. Do you agree that the baseline information as set out in table X is relevant, accurate and of sufficient detail to support the LDP?

Answer: Duly comment - surprise at figure of 4 properties built against our advice - your ref: page 20 - No timescale/period. - Question over 4 figure.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

05. Do you agree with the sustainability issues identified for Carmarthenshire?

Answer: Yes

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

06. Are there any issues that you would want to see either included or excluded from the list provided?

Answer: a) Include surface water flooding issue - key issue 4 & 5. b) Soil - Brownfield - PPW accepted policy ref: page 23 - para 2.7.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

11. Any other comments?

Answer: General issue with respect to Bury Estuary and cockle levels. Ongoing research and is an important environmental issue for future of Llanelli area. Comments;-Main document

1) Appears to be an omission of reference to PPW - Planning Policy Wales in the setting of policy context. This is the prime statement of intent. Your ref; para. 2.1 onwards page 6.

2) Para 3.6.5 No indication of the time period for the factors. Some surprise at a figure of only 4 properties built against EAW advice. Your ref; Page 20.

Non technical advice document

3) Key issues 4 & 5. No mention of surface water flooding issue and potential/implications.

4) Soil - previously used land for development.

This is PPW accepted policy - Brownfield sites where possible etc. Ref; PPW; Para. 2.7, page 23

emissions are 9.45 tonnes, lower than the Wales average but still much higher than the suggested personal carbon allowances of around 1 tonne annually. Domestic per capita carbon emissions are 2.657 tonnes annually, higher than the Wales average of 2.598.

See <http://www.defra.gov.uk/environment/statistics/globalatmos/galocalghg.htm> for more information.

Additional information on the current public and private housing stock condition and energy performance should also be included here. This can draw on information held by the council as well as the Energy Saving Trust HEED database.

http://www.energysavingtrust.org.uk/uploads/documents/housingbuildings/heed_bn%20April08.pdf

This report should also list any known statistics on fuel poverty in Carmarthenshire to be used as a baseline. New homes and major renovations requiring planning permission should be affordable to heat and power.

3. A ydych yn cytuno fod y wybodaeth gychwynnol a nodir ym mhennod 3 yn berthnasol, yn gywir ac yn ddigon manwl i gefnogi'r CDLI?

3. Do you agree that the baseline information as set out in chapter 3 is relevant, accurate and of sufficient detail to support the LDP?

See above comments.

4. A ydych chi o'r farn fod unrhyw anghysonderau neu anghywirdebau yn y data cyfredol a goladwyd?

4. Do you consider there to be any anomalies or inaccuracies with the current collated data?

No response.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

03. Do you agree that the baseline information as set out in table X is relevant, accurate and of sufficient detail to support the LDP?

Answer: Yes. There should be more emphasis on energy and building local resilience, and new development must be carbon neutral as soon as possible, with interim targets using levels of the Code for Sustainable Homes and BREEAM together with improvement on the energy efficiency levels of the building regulations. As carbon emission levels need to be dramatically reduced in order to avoid the worst possible effects of climate change, new development must wherever possible contribute low and zero carbon energy to the grid, and it is no longer an option simply to "encourage" renewable energy to be used.

6. A oes unrhyw faterion yr hoffech chi eu gweld yn cael eu cynnwys neu eu tynnu allan o'r rhestr a ddarparwyd?

6. Are there any issues that you would want to see either included or excluded from the list provided?

Peak oil – Supply of oil and all fossil fuels is finite, and as new discoveries continue to decline while demand for energy increases, inevitable problems have arisen and will continue to affect all aspects of development.

Several suggested objectives relating to peak oil have already been identified in the SA/SEA, such as increasing renewable energy capacity and increasing energy efficiency. However, including this issue in the consideration of elements of the local development plan will ensure that energy issues are examined from as many perspectives as possible, and that the urgency of energy demand reduction is recognised.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

07. Do you consider that the sustainability objectives identified in X are consistent with national, regional and county level policy / guidance and are appropriate to Carmarthenshire?

Answer: We generally support the objectives, but would make the following comments:-

Code for Sustainable Homes Levels should be used instead of ECO Homes. It may be useful to indicate the specific energy efficiency standard expected, as Code for Sustainable Homes and BREEAM are both measures of overall sustainability, not just energy and carbon emissions in a given building.

The LDP should also seek to reduce carbon emissions from the existing building stock. This can be achieved by requiring cost-effective energy efficiency measures to be installed to the whole of a property when an extension or major renovation comes through for planning permission. The LDP and further planning guidance can also encourage householders to install renewable microgeneration systems.

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We suggest that the climate change mitigation objectives are separated from the climate change adaptation objectives.

Although there are already several indicators relating to energy/climate change issues listed in the consultation document, some of the indicators listed below might be useful to add:-

- Homes applying for planning permission for microrenewables
- Homes installing microrenewables
- Average SAP rating of housing
- Number of town/community based carbon reduction projects
- Homes achieving level ___ of Code for Sustainable Homes. (Level should increase gradually – this step change system will eventually replacing Eco Homes)

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

08. Are there any additional objectives that should be included or should be removed?

Answer: No

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

09. Do the sustainability objectives and indicators provide an appropriate framework for the Sustainability Appraisal of the LDP?

Answer: Yes - see comments above

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

10. Are there other / additional methods that could be used to identify the significant environmental and wider sustainability effects of the LDP?

Answer: No response

Officer response:

Officer recommendation:

11. Any other comments?

Answer: Background to West Wales ECO Centre

West Wales ECO Centre was established in 1980 as the West Wales Energy Group. Its remit was and has always been promotion of the issues surrounding energy use and the environment, encapsulated by its charitable objectives:

1. the advancement of public education in all aspects of energy conservation and energy use;
2. the relief of fuel poverty in the local population;
3. the advancement of public education in matters relating to the environment, insofar as they relate to energy conservation and energy use.

Primarily we seek to reduce society's impact on the environment, in particular its contribution to global warming and unnecessary climate change, through our work. This is only possible by taking steps to reduce our demand on the environment, because of our energy use, and making changes to the way we live our lives so that we reduce our reliance on fossil fuel based energy.

It meets these objectives in a number of ways and by working with a very wide cross section of society.

The ECO Centre has been providing energy advice for more than twenty years, establishing the first Energy Efficiency Advice Centre in Wales in 1993. The Energy Advice Centre, North Wales in the office in Mold, Flintshire was established in 1999. The ECO Centre runs a range of projects to enhance the advice service, covering grant handling schemes for local authorities, targeting of fuel poor and vulnerable households, and the promotion of energy efficiency through service level agreements with authorities across our geographical area. The ECO Centre now has responsibility for outreach work in all but the industrial south east of Wales, for the new Energy Saving Trust Advice Centre, as well as the contract for the Local Authority and Housing Association Support programme in North, Mid and South West Wales.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0005

Respondent: Mr Mike Webb
RSPB Cymru

Agent (where used):

02. Do you have, or know of, any additional relevant baseline information which should be added to that already listed?

Answer: The baseline is presented in an inconsistent manner. Some topics are addressed merely as policy-neutral compendia of facts, whilst in others, "areas of concern" of identified. The RSPB recommends that areas of concern are identified for all topics

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

03. Do you agree that the baseline information as set out in table X is relevant, accurate and of sufficient detail to support the LDP?

Answer: The statement that there are no SINC's in Carmarthenshire is misleading. The reason for this is that there is currently a lack of resources to allow the designation of a suite of SINC's which fulfil the criteria. Thus the reason for the lack of designated SINC's is a lack of financial resources, not a lack of land of sufficient biodiversity value.

There are two categories of conservation concern which are missing from the baseline:-

- UKBAP Priority Habitats and UKBAP Priority Species
- Habitats and species listed pursuant to s42 of the NERC Act as being of "principal importance for the conservation of biodiversity"

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

04. Do you consider there to be any anomalies or inaccuracies with the current collated data?

Answer: Information supplied in respect of the Carmarthenshire LBAP is incomplete as the following species should be included on the list at page 16:-

- Nightjar
- Red Kite

Pipistrelle bat and marsh fritillary included as habitats, instead of species.

The SEA scoping document should also include reference to the RSPB Key Area concept for birds. Carmarthenshire contains Key Areas for a number of species of acknowledged conservation concern. The concept of RSPB Key Areas has been developed in order to concentrate conservation effort for scarce and declining species in areas where it is most urgently needed, and where it will have the greatest effect.

Climatic Factors: The baseline section on climatic factors does not refer to the dispersed settlement pattern in Carmarthenshire, which means that transport - related CO2 emissions are high. Nor does it identify a sustainable land use pattern which reduces the need to travel and journey lengths as a means by which the LDP may address this issue.

The document incorrectly refers to the Welsh Assembly Government's "aspirations" for the generation of renewable energy. These are binding targets, set out in TAN 8

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

05. Do you agree with the sustainability issues identified for Carmarthenshire?

Answer: There are a number of inconsistencies and inaccuracies relating to the Key Issues and Challenges" section of the document:-

- Biodiversity: The "Key Issues" cell in this table restricts itself wholly to designated sites. It should be expanded to refer to:-
- UKBAP Priority Species and Habitats (see above)
- s42 species and habitats (see above)
- Carmarthenshire LBAP, SAP's and HAP's

The cell should be amended to take this into account, as well as the appropriate "Source" cell.

The "Key Issues and Challenges" cell is further deficient because it does not identify how the LDP could impact on the baseline resource. In the case of biodiversity, this cell should list:-

- Direct habitat and species destruction via built development in inappropriate locations.
- Indirect effects from built development including such effects as disruption to hydrology (habitats) and visual or noise - related disturbance (species)
- The effects of LDP - induced climate change on species and habitats.

In the case of climate change, the "Key Issues and Challenges" cell should refer to:-

- Inappropriate location of development which results in an increase in car-borne and lorry-borne transport.
- The transport implications of development, for example transport generating development.
- Inappropriate design of development which results in increased CO2 emissions from that development.

These issues should be translated into Climatic Factors SA Objectives in column 3.

SA Objectives

EU Bathing Water Directive 76/160/EEC
EU Freshwater Directive 78/659/EEC
EU Thematic Soil Strategy
EU Shellfish Water Directive 79/932/EEC

UK

Stern Review on the Economics of Climate Change 2006
UK Marine Bill Consultation Document 2006
UK Climate Impacts Programme 2002
Draft Climate Change Bill 2007
Sustainable and Secure Buildings Act 2004
Our Energy Future- UK White Paper on Energy 2003
Water Resources for the Future (EA)

National/Wales

Relevant Water Resource Management Plans (Dwr Cymru/Welsh Water)
Relevant Catchment Abstraction Management Plans and Drought Management Plans
Welsh Assembly Government Integration Tool 2002
Air Quality and Climate Change: A UK Perspective 2007
Wildlife and Countryside Act 1981 (as amended)
CCW Priority Habitats in Wales 2003
Conservation (Natural Habitats & c) Regulations 1994 (as amended)
Earth Science Conservation in Great Britain 1990
Better Woodlands for Wales 2005
Countryside and Rights of Way Act 2000
NERC 2006
Wales Transport Strategy
Consultation Planning Policy Statement: Planning and Climate Change 2006
Welsh Office Circular 60/96: Planning and the Historic Environment. Archaeology/Historic Buildings
Draft Wales Soils Action Plan 2007
Ancient/Listed Buildings and Archaeology Areas Act 1990
Planning (Listed Buildings and Conservation Areas) Act 1990
A Cultural Strategy for Wales 2002
WTB: Cultural Tourism Strategy for Wales 2003
Draft Strategy for Wales on Integrated Coastal Zone Management 2006
Protection of Badgers Act 1992
Hedgerow Regulations 1997

Regional/South West Wales/Local/Carmarthenshire

Woodlands for Wales, FC 2001
Tir Gofal 1999
Existing UDPs and Developing LDPs for adjacent and relevant Authorities
LBAPs for adjacent and relevant authorities
Brecon Beacons National Park Management Plan (in development)
Air Pollution in Wales 2006
Traffic Management in Historic Areas, Cadw 2003
Relevant River Basin Management Plans (in development)

We note that a few documents were not available for review at the time of preparing the scoping report as they are currently in development or having recently been produced. CCW is of the opinion that the draft Catchment Flood Management Plans which have now been issued by the Environment Agency (Wales), Carmarthen Bay Shoreline Management Plan and the Western District River Basin Management Plan should be reviewed as part of the SEA process.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

03. Do you agree that the baseline information as set out in table X is relevant, accurate and of sufficient detail to support the LDP?

Answer: 3.3: Biodiversity.

There is a need to take full account of biodiversity in areas outwith designated sites in order to help move towards and meet national biodiversity targets and fulfil the requirements of NERC 2006. In particular, consideration of and further information on wildlife 'corridors' would be welcomed. We are aware that your authority is piloting a project looking at biodiversity opportunities around settlements and we feel that this should inform the process.

Reference has been made to the SACs and SPAs within the Plan area including NNRs and LNRs and we welcome this. We feel that a map indicating spatially the designated sites for nature conservation would be

useful.

Please note that in respect of the condition assessment of features of the Carmarthen Bay & Estuaries Special Area of Conservation (intertidal mudflats and sandflats; estuaries), and the Burry Inlet Special Protection Area (oystercatcher; knot), we are in the process of reassessing their condition. The original assessment was completed at the end of 2006 and new information has come to light since which, with our current knowledge, will most likely result in the conclusion of unfavourable conservation status in respect of the above features. We will advise you on the final outcome of our reassessment once it has been completed.

Consideration should be given to indicate areas under direct or indirect management and/or protection for nature conservation purposes e.g. agri-environment schemes, TPOs and Hedgerow Preservation Orders.

This baseline section should be cross referenced to and linked to the climate change section. Future predicted climate change is likely to have considerable impact on the biodiversity, flora and fauna of the Plan area. In some cases this may mean species/habitat loss or degradation however, future climate change may increase or enhance other species and habitats.

3.4: Air Quality

Consideration needs to be given to ground level ozone layers (and impacts of human and habitat health)

3.5: Climatic Factors.

CCW notes and welcomes the use of ecological footprinting within this report. It is suggested that the baseline would benefit from increased (spatial) information with regard to areas likely to be subject to increasing flood hazard.

3.6: Water

Reference should be made to forecasts on supply and demand of water. In addition, CCW would welcome additional information in respect of water quality issues within Carmarthenshire fresh and coastal waters i.e. are there any specific areas with water quality issues and if so, what are the causes/sources of pollutants and are the adverse water quality issues exacerbated by any particular conditions and/or activities?

3.7:

With regard to material assets, further information on the nature and location of particular assets (both natural and man made) would be welcomed e.g. coal reserves, mineral and aggregates reserves, energy and water infrastructure.

Further information would be welcomed with regard to recycling targets and trends for waste in Carmarthenshire

3.8.2: This section refers to alluvium gravel deposits on the Teifi but makes no similar reference to alluvial gravel and aggregates in the Tywi floodplain

3.9: Consideration should be given to the use of the Landmap, Seascape Assessments and Landscape Characterisation maps in determining visual quality and condition within Carmarthenshire. Objectives should be devised which will seek to maintain and enhance the character and distinctiveness of Carmarthenshire landscapes, whether protected or otherwise.

3.10.

Previous Local Plans and the Unitary Development Plan have identified designated and proposed Conservation Areas. These conservation areas e.g. Cwm Du and other areas considered as candidates for Conservation Area designation should ideally be considered/referred to within this section.

3.12.1

Reference should be made to the 1997 Tranquillity Maps for Wales. Further Tranquillity/Intrusion mapping of Wales will be undertaken (by CCW) in 2008.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

05. Do you agree with the sustainability issues identified for Carmarthenshire?

Answer: 4: Key Issues and Challenges.

2: CCW welcomes the acknowledgement of the number, extent and condition of 'designated' sites of nature conservation interest within Carmarthenshire. Strengthening of references (and objectives) relating to the needs of wider biodiversity and wildlife species (outwith 'designated' sites) should be made e.g. connectivity between protected sites.

4: CCW welcomes the aim of encouraging new developments to be climate 'resilient' however, it is suggested

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that this section should be strengthened to include the express aim of 'climate proofing' existing development, infrastructure and material assets

It is suggested that objective 4.1 be amended to read along the lines of 'to reduce the need for energy whilst encouraging and increasing the use of renewable energy sources'.

7: CCW welcomes the commitment shown towards the protection and enhancement of soils. Further consideration would be welcomed with regard to the role of soils in flooding and carbon sequestration. This 'issues' section should perhaps make explicit reference to the need to control/remediate diffuse air pollution deposition, not just the pollution deriving from agriculture

9: Clarification is required as to what is understood by sites of 'landscape value'

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

06. Are there any issues that you would want to see either included or excluded from the list provided?

Answer: 5.1: Sustainability Appraisal Framework.

2: Biodiversity.

CCW would suggest that some of the indicators, as suggested, are only of limited value given the context of this SEA relating to an LDP. Indicators should be relevant to the plan under scrutiny, capable of reacting in response to the plan under scrutiny and also capable of measurement. For example, CCW does not wholly understand the value (in the context of an LDP SEA) of the indicator 'proportion of woodland that is certified'. Assuming that this indicator relates to FSC certification, this certification is outwith the control of the Local Authority and the LDP and is not therefore relevant to or reactive to the Plan. Similarly, CCW would suggest it would be extremely difficult to relate or attribute the % of SAC and SSSIs (albeit with no mention of Ramsar Sites, SACs, and SPAs) in favourable condition to the Carmarthenshire LDP. With the exception of the proposed indicator 'number of development schemes...urban biodiversity areas', CCW would have to express its dissatisfaction with suggested indicators and would recommend their reconsideration.

SEA Topic Guidance Notes on SEA and Biodiversity (including advice/guidance on selection of targets and indicators) have been produced by CCW and can be provided if requested.

3: Air Quality

CCW would suggest that some of the indicators, as suggested, are only of limited value given the context of this SEA relating to an LDP. Indicators should be relevant to the plan under scrutiny, capable of reacting in response to the plan under scrutiny and also capable of measurement. For example, CCW would suggest it would be extremely difficult to relate or attribute sensitive habitats exceeding critical loads solely to the Carmarthenshire LDP. CCW would therefore recommend reconsideration of air quality indicators.

SEA Topic Guidance Notes on SEA and Air (including advice/guidance on selection of targets and indicators) have been produced by CCW and can be provided if requested.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

11. Any other comments?

Answer: 5: Water and 4: Climate Change

CCW would suggest that a useful indicator in respect of water and/or climate change might relate to the number of homes/roads/development approved within floodplain areas or coastal flood zones

9: Landscape.

This section (objectives and indicators) should be strengthened in respect of seeking to protect and enhance the character and distinctiveness of the Carmarthenshire landscape.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0007

Respondent: Michelle Webber
Pembrokeshire County Council

Agent (where used):

11. Any other comments?

Answer: I have no major comments from an officer perspective on the SA Scoping Report. I think you should probably add your neighbouring authorities LDPs/JUDPs etc into the PPP review. Authorities should have regard for these in the development of their own plan.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0008

Respondent: Dr L Wilberforce
Wildlife Trust of South and West
Wales

Agent (where used):

11. Any other comments?

Answer: The Wildlife Trust of South and West Wales (WTSWW) are grateful for the opportunity to comment on The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Scoping Report (September 2008) as part of the production of the Carmarthenshire Local Development Plan.

We have not commented on all sections of the report, only those directly within our remit: primarily biodiversity, soil air and water, and climate change and flooding. Comments will be added below under the relevant headings from the document.

Section 2L Relationship of the LDP with other relevant Plans, Policies and Programmes International/European

There are a number of international / European directives and strategies which we feel are absent from this list but relevant to the contents of the SA/SEA:

RAMSAR (1971) – especially as it is referenced in section 3.3, and since the Birds and Habitats Directives are specifically referenced EU Groundwater Directive 2006/118/EEC

EU Environmental Liability Directive 2004/35/EC (2004)

EU Thematic Soil Strategy (and Soil Framework Directive (Consultation Draft 2007))

Convention on Long Range Transboundary Air Pollution (1979)

EU Biodiversity Strategy (1998)

UK

The following documents might additionally be considered for inclusion at a UK level for their relevance to the Carmarthenshire LDP:

Dr Lizzie Wilberforce

The Wildlife Trust of South and West Wales
Welsh Wildlife Centre

Cilgerran

Cardigan

SA43 2TB

07970 780553

1hl.wilberforce@welshwildlife.org

rg

www.welshwildlife.org

Also at:

The Nature Centre

Fountain Road

Tondu

Bridgend

South Wales

CF32 0EH

info@welshwildlife.org

Chief Executive:

Dr Madeleine Havard

Reg Charity

No. 1091562

Company No.

4398959

Gwarchod Natur ar gyfer y Dyfodol

Protecting Wildlife for the Future

Cleaner Coasts, Healthier Seas (EA 2005)

Marine Bill

Conservation (Natural Habitats &c.) Regulations 1994 as amended 2007

Wildlife and Countryside Act (1981) & The Countryside and Rights of Way Act (2000) (mentioned in the document text)

The documents we feel are most notably absent are:

Nature Environment and Rural Communities [NERC] Act (2006)

DEFRA Guidance for Local Authorities on implementing Biodiversity Duty (2007)

Since the NERC Act places a duty on Local Authorities to have regard for the conservation of biodiversity in exercising all of their functions, it

should be an integral part of the SA/SEA scoping. The second document provides guidance on how the NERC duty can be implemented.

There is also Welsh guidance on the NERC duty on the Wales Biodiversity website to be used in conjunction with the DEFRA document:

http://www.biodiversitywales.org.uk/legislation__guidance-20.aspx
Wales

Welsh Soils Action Plan (consultation draft)

Planning Policy Wales (WAG 2002)

Farming for the Future (WAG 2001)

Priority Habitats of Wales (CCW 2003)

Woodlands for Wales (WAG 2001)

Better Woodlands for a Better Wales (FCW 2005)

Regional/South West Wales

Consider including neighbouring LBAPs

Catchment Abstraction Management Strategies (CAMS)

Section 3- Baseline

3.3 Biodiversity

There is an additional NNR in Carmarthenshire, Cors Goch (Llanllwch), which is owned and managed by the Wildlife Trust.

It should be emphasised that there are no SINCs in Carmarthenshire through the failure to adopt a system of designation due to lack of resources, rather than the absence of suitable sites.

Additional information for inclusion on habitats of value within Carmarthenshire might be gained from referencing the disaggregated targets for priority habitat expansion for the county, which are available from the Wales Biodiversity Partnership.

Section 4- Identifying Sustainability Issues / Environmental Problems

Section 2, Biodiversity Key Issues and Challenges, should reference the NERC Act since this is relevant to biodiversity on all sites and not just those established to be of existing value. However we commend the council on Objective 2.2 "to protect, enhance and create appropriate wildlife habitats and wider biodiversity in urban and rural areas", which does encompass the spirit of the council's biodiversity duty. One potential additional objective would be to improve access and hence allow the county's population to access, enjoy and understand the local natural heritage.

Section 4, Climatic Factors, Objectives. Although a small issue, we would prefer to see more positive wording of the objectives, for example, 'An increase in the climate resilience of new developments' rather than 'To encourage all new developments to be climate resilient'.

Section 7, Soil, Objectives. We would like to see a separate objective identified to reduce or eliminate further loss of high-carbon soils such as peat to development

Section 6, Material Assets, Objectives. Introducing an objective of delivering a robust ICT/broadband system could assist with other objectives of reducing travel, meeting local needs and reducing resource use.

Section 5- Developing the SA/SEA Framework

Section 2- Biodiversity. For statutory sites such as SACs and SSSIs, it might be of value to look at the status (favourable or otherwise) of the site features as well as the sites themselves.

Unfortunately the absence of a Wildlife Sites / SINC system in the county means that one potential indicator is absent, that is, a systematic way of assessing whether there is an impact on sites of local importance.

Section 4- Climatic Factors. The decision making criteria should include all greenhouse gases, not only carbon dioxide.

In general terms the indicators for this section are relatively sound, since they ask quite searching questions of the LDP, which may in fact be quite hard to assess in some cases. However, if answered, they will provide a good assessment of the impact of the plan.

The National Assembly for Wales published an Environmental Strategy for Wales [ESW] in 2006 listing a number of biodiversity targets and outcomes:

- By 2010 95% of international sites in favourable condition.
- By 2015 95% of Welsh SSSIs in favourable condition.
- By 2026, all sites in favourable condition

ESW Outcome 19 "The loss of biodiversity has been halted and we can see a definite recovery in the number, range and genetic diversity of species, including those species that need very specific conditions to survive."

ESW Outcome 20 "The wider countryside is more favourable to biodiversity through appropriate management, reduced habitat fragmentation and increased extent and interconnectivity of habitats."

ESW Outcome 21 "Sites of international Welsh and local importance are in favourable condition to support the species and habitats for which they have been identified"

And as a Section 28G authority, under Section 9 of The Countryside and Rights of Way Act 2000, Carmarthenshire has a duty to look after all these sites positively:

"Statutory undertakers, etc.: general duty.

28G. - (1) An authority to which this section applies (referred to in this section and in sections 28H and 28I as "a section 28G authority") shall have the duty set out in subsection (2) in exercising its functions so far as their exercise is likely to affect the flora, fauna or geological or physiographical features by reason of which a site of special scientific interest is of special interest.

(2) The duty is to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest.

(3) The following are section 28G authorities-

(a) a Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;

(b) the National Assembly for Wales ;

(c) a local authority;

(d) a person holding an office-

(i) under the Crown,

(ii) created or continued in existence by a public general Act of Parliament, or

(iii) the remuneration in respect of which is paid out of money provided by Parliament;

(e) a statutory undertaker (meaning the persons referred to in section 262(1), (3) and (6) of the Town and Country Planning Act 1990); and

(f) any other public body of any description."

We would like to commend Carmarthenshire County Council on the significant effort that has been expended in the development of this document, and the recognition it has given to the value of Carmarthenshire's natural environment.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0009 **Respondent:** Mr Lynn Davies **Agent (where used):**
Llanelli Town Council

11. Any other comments?

Answer: refer to your letter of 2nd September 2008 [ref. LDP/IRL/SA] and to the above-mentioned draft document which was considered at this week's meeting of the Council's Planning and Development Committee meeting. Members were in general agreement with its content, but did make the following comments which I am instructed to relay to you:

Key Issue 5 – Water – This deals with the water quality of rivers, lakes, ground water and coastal areas and the need to minimise flood risk. However, no reference is made to the serious problem posed by an inadequate sewerage and sewage disposal system, both in Llanelli and in other parts of the county, which has for some time resulted in the regular discharging of sewage into the Loughor Estuary and the Towy river, all of which is now prejudicing present and future developments, particularly in the Llanelli area. It is considered that the Report should specifically identify this as a further key issue and set out how the LDP proposes to deal with it.

Key Issue 12 – Education and Skills – The Report fails to identify the influx of a large foreign migrant population into the county, and the way in which the LDP proposes to address their education skills and requirements.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0010 **Respondent:** Cllr Sian Mair Caiach

Agent (where used):

11. Any other comments?

Answer: I am concerned by the lack of mention of the problems in the Loughor Estuary/Burry Inlet/Carmarthen Bay which are the major ecological and development issues which we have in Carmarthenshire. This is a huge omission and the little information contained on the subject is sparse and in parts clearly incorrect. The key issues and challenges section fail to mention entirely what appears to be an ecological disaster which has halted major building developments in south Carmarthenshire and is now simiarly affecting a large area of the county of Swansea. This can only be addressed by urgent research and probably massive investment in the water and sewage drainage and treatment infrastructure.

In a very strongly worded letter to Mr S M Jones [department of sustainability and housing, Assembly Government] dated 26/8/08 Huw Williams, district team leader for the Countryside Council of Wales in Carmarthenshire states:-

"As outlinedin the meeting of August 15th {a meeting involving CCW, Dwr Cymru,CCC and EAW} it became apparent that the number of "storm discharges" from the Llanelli Sewerage System was unlikely to be reduced as a result of AMP [asset management plan] 4, as only UV treatment of some of the storm water discharge will be put in place.This will not reduce the quantity of excess nutrients entering the estuary.

He goes on to describe the various factors found by the Cockle Mortality Study undertaken in association with Seafish,CCW,EAW,SWFSC and WISE network which gave an executive report in April 2008. "ANOVA analysis on 3 monthly mortality data for the Burry Inlet indicated rainfall, riverflow, DAIN loadings, water temperature, Ammonia, Nitrate, Nitrites, Faecal Coliforms, Faecal Cloli, Lead, Zinc, pH, Orthophosphate, Phosphate and Silicon Oxide were significantly associated with mortality..... Further Analysis of data from [sewage] outfalls showed similar determinands as for the Burry and Three Rivers data as significantly associated with [cockle] mortality."

"Water quality is significantly implicated in these chronic cockle mass mortality events". He then goes on to describe the dramatic fall in oystercatcher numbers and their abnormal feeding behaviour over the recent years and that the Burry Inlet SPA is considered by CCW to be in unfavourable conservation status. In Jacobs report this SPA is claimed to be in favourable condition, with oystercatchers specifically mentioned. The condition of the whole RAMSAR site, a major European Concern is not examined. In the SA objectives under 5." Water" there is no specific mention of the major pollution problem we seem to have and that we are probably looking more to a "clean up" than "keep clean" situation.

I am particularly concerned that we are in a situation where Dwr Cymru's upgrade will not clean up the estuary and improve the estuarine environment. If our sewage outfalls are currently heavily polluted with suspected cockle poisons, especially nitrogen compounds, we need to urgently rethink our sewage treatment. I know from my attendence at the Llanelli flood forum that we are losing other wildlife appart from the cockles including sand eels, lugworms and wading birds who feed on sand dwelling animals. How can we have an SA/SEA that does not address this problem??? Do we just sit and wait for 2010 and see if a few extra UV water treatment plants fail to make any difference as Mr Williams predicts or do we act now to save our environment and our fishery?

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0011 **Respondent:** Sue Miles

South West Wales Integrated
Transport Consortium (SWWITCH)

Agent (where used):

11. Any other comments?

Answer: SWWITCH is pleased to provide comments on the Scoping report and trusts that the following will be constructive.

The report is comprehensive and covers all possible considerations. As SWWITCH has been involved in the Strategic Environmental Assessment for the South West Wales Regional Transport Plan, it is important that where possible information is hared to reduce costs and time of baseline data collection.

- SWWITCH is supportive of the Carmarthenshire approach and is happy to share any relevant information which has arisen as a result of the SWWITCH SEA work
- Section 3 – Air quality – the text on challenge and issues makes no reference to the fact that there are some areas in the County (closely related to road and transport emissions) where air quality is becoming and issue with the potential to breach standards in next 5years. One of the SA objectives related to this challenge (3

-3) is to reduce the need to travel through appropriate siting of new developments. This should be to reduce the need to travel by private car rather than an absolute reduction in travel.

- Section 6 – Material Assets – refers to the SA objective to promote the use of more sustainable modes such as walking and cycling. Do they really mean this, are they proposing to do marketing etc or do they really mean encourage the use through appropriate development and user friendly local links etc.
- Section 13 – Economy – here there could and should be reference in challenges to the inability of non car owners to access jobs and training with an SA objective related to improving access to jobs and training by sustainable means which then ties down to the location and siting again in the “decision making criteria section”

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0012 **Respondent:** National Grid Company plc. **Agent (where used):** Chris Palmer
White Young Green Planning

01. Are there any other relevant policies, plans and programmes that have not been identified?

Answer:

Officer response:

Officer recommendation:

11. Any other comments?

Answer: Although the National Grid does not wish to make any specific representation at this time, we would be most grateful if you would continue to consult with National Grid on all future planning policy documents. National Grid wishes to be involved in the preparation, alteration and review of Local Development Plans, which may affect its assets, including policies and plans relating to the following issues; - Any policies related to overhead transmission lines, underground cables or gas pipeline installations - site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines - land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations - any policies relating to the diverting or undergrounding of overhead transmission lines - policies relating to development in the countryside - landscape policies - waste and mineral plans

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0013 **Respondent:** Bethan Thomas **Agent (where used):**
Npower renewables

03. Do you agree that the baseline information as set out in table X is relevant, accurate and of sufficient detail to support the LDP?

Answer: Within Section 3.5-baseline assesment-NRL welcomes the recognition of Carmarthenshire's vulnerability to climate change and the acknowledgement of TAN 8, with the identification of the Brechfa Forest area as a Strategic Search Area for major wind farm development

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

06. Are there any issues that you would want to see either included or excluded from the list provided?

Answer: NRL welcomes the inclusion of the following sustainability objectives - 4-1: to reduce the emission of greenhouse gases. 4-5: to minimise energy consumption and promote renewable energy sources.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

10. Are there other / additional methods that could be used to identify the significant environmental and wider sustainability effects of the LDP?

Answer: 5.1 - Sustainability Appraisal Framework. NRL welcomes the inclusion of 'number of wind turbines' as an indicator for the appraisal process. It may also be useful to include an indicator relating to the number of installed mega watts of renewable energy capacity within Carmarthenshire to provide an overall picture for renewable energy.

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

11. Any other comments?

Answer: section 3.5 - within section 3.5 (baseline assessment) - NRL welcomes the recognition of Carmathenshire's vulnerability to climate change and the acknowledgement of Tan 8, with the identification of the Brechfa Forest area as Strategic Search Area for major wind farm development Section 4 - NRL welcomes the inclusion of the following sustainability objectives : 4.1- to reduce the emission of greenhouse gases....4.5- to minimise energy consumption and promote renewable energy sources.... Section 5 - 5.1 - Sustainability Appraisal Framework , NRL welcomes the inclusion of 'number of wind turbines' as an indicator for the appraisal process.

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It may also be useful to include an indicator relating to the number of installed mega watts of renewable energy capacity within Carms to provide an overall picture for renewable energy. I

Officer response: that the response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0014 **Respondent:** Chloe Driver
Equality and Human Rights
Commission **Agent (where used):**

11. Any other comments?

Answer: We are sure you will appreciate that the Equality and Human Rights Commission receives many such documents. Unfortunately we do not have the resources to respond to consultations unless they concern matters which are directly related to the work of the EHRC

Officer response: response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0015 **Respondent:** Mrs Kathy Start
Abergwili Community Council **Agent (where used):**

01. Are there any other relevant policies, plans and programmes that have not been identified?

Answer: Is there any list of applicants for allotments? Has any survey been done to see if householders would like opportunity to grow their own food - particularly in current economic downturn?

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

02. Do you have, or know of, any additional relevant baseline information which should be added to that already listed?

Answer: I suggest a survey is taken of representative communities, eg small areas in several towns in Carmarthenshire, a cross-section of villages and farms asking a) do you grow own fruit/veg, and if so how much? B) would you like to do same if land available and support to establish garden.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

03. Do you agree that the baseline information as set out in table X is relevant, accurate and of sufficient detail to support the LDP?

Answer: Yes, with comments on next page to be taken into consideration, and other relevant comments from other consultees.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

04. Do you consider there to be any anomalies or inaccuracies with the current collated data?

Answer: Not to my knowledge except for item 3.7 final paragraph. Could I suggest that with rising price of oil and less spending power, car use patterns could change significantly and demands for public transport increase.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

05. Do you agree with the sustainability issues identified for Carmarthenshire?

Answer: Yes - with the rider that one major sustainability issue has been ignored!

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

06. Are there any issues that you would want to see either included or excluded from the list provided?

Answer: Yes!! There is no mention of the likely future need for families and individuals to be able to grow their own fruit and veg for economic and other reasons. This aspect should be included in section of 'material assets' baselind, should be considered at planning application level and added to health and wellbeing sections as well as sustainability sections. Also need to include in Biodiversity section, the urgent need to encourage wildlife corridors to enhance vital pollenation.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

07. Do you consider that the sustainability objectives identified in X are consistent with national, regional and county level policy / guidance and are appropriate to Carmarthenshire?

Answer: Yes, again with the rider that perhaps these most basic of all sustainable issues, ie knowledge and ability to grow (a certain proportion) of food should be included

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

08. Are there any additional objectives that should be included or should be removed?

Answer: As for question 6 - essential that, in our efforts to become a more 'sustainable'society, that we encourage local

good production by both farmers and families; and gardening in all forms. Schools could also be involved.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

09. Do the sustainability objectives and indicators provide an appropriate framework for the Sustainability Appraisal of the LDP?

Answer: Generally excellent objectives, but PLEASE! INCLUDE SUGGESTIONS PREVIOUS

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

10. Are there other / additional methods that could be used to identify the significant environmental and wider sustainability effects of the LDP?

Answer: FUTURE DOMESTIC DWELLINGS COULD/SHOULD HAVE A HOUSE; GARDEN RATIO THAT ALLOWS FRUIT, BEG AND AMENITY AREA. (Too many developments currently are high building:garden ratio, some have almost no garden area) OR PROVIDE ALLOTMENTS IN EACH VILLAGE, TOWN AREAS.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

11. Any other comments?

Answer: I WOULD BE GRATEFUL FOR FEEDBACK, THANKS! These are my opinion, but am supported by other members of Abergwili Community Council in offering these views. I have answered the questions in the report - but would like to emphasise (in my view) a very important and basic omission in the whole discussion of sustainability. Whilst the report has been

far reaching and rigorous in its assessment of certain key issues and challenges, and the baseline documents have been carefully researched, I find no mention of the means by which we can ensure the citizens of the locality and beyond can meet their food requirements!

Just as financiers, bankers and the Government virtually buried their head in the sand concerning an imminent financial crisis (due in part to lack of common sense in the lending and mortgage market, poor use of resources and government money), we are at risk of a similar catastrophe if we fail to provide the means by which people can have the opportunity to grow at least some of their own food.

I think that we should be ensuring that every household has a large enough garden to grow fruit and vegetables, or use of an allotment within walking or cycling distance. Our schools should be taking a lead in teaching ALL pupils how to grow food (a rural science or gardening option should not be seen as a topic only for non-academic pupils), and there should be a concerted effort to promote 'Grow Your Own', just as there has been campaigns to introduce 'Reduce, Reuse, Recycling' and, more recently, efforts to reduce energy consumption.

There are many areas of the Sustainability Appraisal/Strategic Environmental Scoping Report where a contribution made by home grown food (and the benefits thereof) is relevant, and I outline them below. Section 1.3 of the Introduction to the report gives the UK Government Sustainable Development Strategy (2005). Under the following headings the following connections can be made:

Living within environmental limits: 'ensure that the natural resources needed for life are unimpaired and remain so for future generations'. This can mean that we should ensure we have land available to grow food in a suitable proximity to the population.

Ensuring a strong, healthy and just society: all the points in this section can be met by promoting gardening and growing: it is well-known that outdoor activity promotes well-being, and that sharing gardening tips and produce encourages social cohesion. Inclusion means that anybody and everybody should be able to participate: people from all walks of society and all ages can be involved, both able-bodied and disabled.

Achieving a stable economy: surely to be sustainable we should be reducing the use of expensive and environmentally polluting transport to bring perishables such as fruit and vegetables to our populace? As an example, there is simply no need to import raspberries from Eastern Europe when they can be grown successfully in a back garden, or even potatoes from Egypt or Cyprus when we have farmers with the knowledge and ability to grow locally. Promoting good governance: gardening is an excellent means by which we can engage people's creativity, energy and diversity. Using sound science responsibly: we have an enormous knowledge bank both in the form of experience (existing gardeners and growers), and access via the internet to research and development of new methods, species etc.

Moving on to Section 2, the Relationship of the LDP with other relevant Plans, Policies and Programmes, I find from a list of around 100 documents, only one - a Local Sustainable Food Strategy - appears relevant to the most basic need in life i.e. Food! (I have not been able to read the actual policy so cannot comment on the content).

In Section 3.1 Baseline, it is possible to link the idea of growing food locally to every single topic heading: Using the table from page 35 onwards, I would like to make the following comments: 1. Sustainable development. It is mentioned that Carmarthenshire's ecological footprint is currently exceeding sustainable levels. The problem is acknowledged in the area of food and drink - let's make a start to improve the outlook by growing more food locally. 2. Biodiversity. We need to enhance biodiversity. What better way than getting more people involved in gardening, and an appreciation of the wildlife habitats that a garden can support. This will also tie in with the demonstrated need for more wildflower/wildlife corridors to prevent fragmentation of sites and thus loss of species. 3. Air quality. It will take time, but if we can reduce traffic a) by people sourcing some food needs from their garden rather than having to drive to a supermarket and b) reducing lorries that

bring in food to shops, then surely this is a step in the right direction? 4. Climatic factors. Climate change is a concern. If people are aware, through hands on knowledge, of how even small climate change (eg increased rainfall) can affect crop production, they will be in a far better position to make the adaptations needed to accommodate or even benefit from the change through a change in the method of timing of planting etc. 5. Water. Gardening encourages people to be aware of water quality and the need to conserve resources. 6. Material assets. As for no. 3 above. Sharing/bartering - as often happens among gardeners - is a means of encouraging needs to be met locally. 7. Soil. Whilst soil in the county is not high quality, it is possible to increase fertility greatly by good gardening practice, so that a small plot can give a consistently high yield - using organic methods is environmentally sound as harmful chemicals do not pollute or act on beneficial insects etc. 8. Cultural Heritage. I suggest that design features that include gardens and orchards would enhance our heritage. 9. Landscape together with the item above, it is probably in this category that planning considerations should be taken into account. At the moment, both residential and commercial dwellings are given planning permission without due regard to the fact that, possibly in the not too distant future, it will be essential that householders have access to a garden to grow much needed food. Far too many developments have a tiny 'amenity' area, certainly not what you could call a garden. I think this is very short-sighted in the light of the speed of change in the global economy, and the very possible chance that, in order to have enough food, families will have to supplement what they can afford to buy, with what they can grow themselves. Here is a golden opportunity for Carmarthenshire to stand out as a county that includes a consideration of truly local food production (ie household and family) in its Local Development Plan, and in particular, new build regulations. One way could be to ensure a minimum house: garden ratio. (In many respects this is just going back to earlier planning considerations when in some rural areas, all council dwellings had a plot large enough to grow potatoes for the year). The keeping of small chickens or small livestock could also be considered. 10. Population. I admit that growing food can perhaps not be included amongst the objectives here! - however, if Carmarthen stood out as a truly sustainable county, then perhaps we would see an influx of people here, keen to be part of a forward looking sustainable economy. 11. Health and well-being. Gardening can be a means by which all these objectives can be achieved. 12. Education and skills. There is a serious lack of knowledge of how food is grown, and young people lack experience. This issue should be addressed in schools (some primary schools do have gardens - this can be encouraged and continued in the secondary schools). Experienced gardeners or gardening clubs could be sought to share their expertise, with social, health and financial benefits to all. 13. Economy. Again 'Grow your Own' can be aligned with all the objectives in this section. 14. Social fabric. It is well documented that gardening fulfils point 14-2. When people learn to garden, they learn to have a respect for people and property, and gardening can help disadvantaged sections of society.

My letter would be too wordy if I repeated the points above as inclusions in the Decision Making Criteria (p42), but I do hope that at least some of the comments will be considered, and the Appraisal amended accordingly. I am forwarding a copy of this letter to Mark James, Chief Executive, and Cllr Pam Palmer, as I think the time is right for a concerted effort to consider the ideas raised and to act before this opportunity passes. I look forward to hearing your comments, and thank you for your interest.

Officer response: that the response is noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0016 **Respondent:** P D & M L Protheroe **Agent (where used):** Mr Robin Cammish QPD Limited

01. Are there any other relevant policies, plans and programmes that have not been identified?

Answer:

Officer response:

Officer recommendation:

11. Any other comments?

Answer: Page 37: While on the whole this is a comprehensive report giving details covering most activities throughout Carmarthenshire and highlighting the needs of communities, one sustainability appraisal objective suggest that local needs should be met locally to reduce the need to travel through appropriate siting of new development and provision of public and transport infrastructure. Surely this calls on central government, the WAG and local authority to take the lead in not closing cottage hospitals, village post offices and schools and putting confidence back in the out-migrating younger workforce of Carmarthenshire. All the needs for energy conservation and higher energy efficiency and minimising energy consumption would be met to some level by relieving the death sentence of local facilities. Will local government and local authority be calling for the closure of GP surgeries, rural police and fire brigade stations next?? It is a natural progression if the present trend is not reversed. Page 39. Paragraph 13, highlight the dominant activities of the county based on tertiary activities including retail, healthcare, and education with quite a high proportion of manufacturing activities. The appraisal fails to recognise agriculture as having any dominant economic value other than manufacturing none of the tertiary activities given any export value to Carmarthenshire (unless you count educating and preparing our teenagers for out-migration). There are over 2000 full time adults employed on farms in Carmarthenshire producing a sustainable product for consumption by the 172,000 who populate this county. Add to that factor the number of service industries supplying agriculture, the both large and small enterprises supply and repairing machinery for use on farms, the processing industries wholesale and

distributors supplied by agriculture products - in all a large workforce producing an exportable end product.
Page 61: If Carmarthenshire were to adopt a sustainable policy on agriculture thereby reducing ozone pollution and nitrogen application, how much impact on Carmarthenshire economy would this have?
We all accept that change in our attitude to fertiliser and pesticides are inevitable, but a sympathetic and responsible attitude by all needs to be considered to lessen the economical impact on Carmarthenshire. Most of the objectives raised by this report have been prepared for use on a global stage. We in Britain have had the luxury of benefitting from cheaper foods from global resources to bolster the food supply chain. If the whole world adopts a sustainable attitude to food production along with us, who does Britain turn to?
Page 79: Under the heading of 'Energy Wales - Renewable Energy route map for Wales' - 'Objectives and Requirements' 20% of energy requirements coming from renewable sources by 2011.
We do not support larger scale biomass project where the fuel source is demonstrably sustainable as these are pollution power stations. We do support the development of community heat and power units under a new wood energy business scheme.
Under the heading of implications for the plan and the SA/SEA, no mention has been made of the environmental impact from the emissions of such developments impacting on: Air quality, noise pollution, disturbance to local habitat, protected birds and animals, human health. General Comment: It is worthy of mention at this point that we will see less nitrogen applied in Carmarthenshire in the foreseeable future due to the financial burden of the product. It is ironic that we, in this country, wish to become less dependent on product boosting inputs whilst sustainable countries like India and China, see their way forward from product boosting inputs and technology from the Western world. Perhaps China will, in the not so near future, be exporting redundant Rickshaws to aid Carmarthenshire in their quest for more sustainable modes of transport!!!

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0017 **Respondent:** Mr David Foot **Agent (where used):**
Dinefwr Ramblers Association

01. Are there any other relevant policies, plans and programmes that have not been identified?

Answer: 1. The work of the Local Access Forum, and the Rights of Way Improvement Plan, should be taken into account. 2. The European Landscape Convention, signed by HM Government, is also relevant.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0018 **Respondent:** Mr Bryan Graham **Agent (where used):**
City & County of Swansea

01. Are there any other relevant policies, plans and programmes that have not been identified?

Answer:

Officer response:

Officer recommendation:

11. Any other comments?

Answer: Non-Technical Summary - Sustainable Development and the SA/SEA Process

2nd paragraph: 'Under European and UK legislation, particular documents such as Local Development Plans must be tested to determine what the effects of the plan will be on sustainability'. The plan cannot have an effect on sustainability per se but on the sustainability of something.

5th paragraph: Terminology is confusing. The SEA/SA tests the impact of the LDP on the sustainability of Carmarthenshire, not the sustainability of the Carmarthenshire LDP itself. This is explained within paragraph 1.4, but is not clear within the Non-Technical Summary. Introduction:

1.1 The County of Carmarthenshire - 'The County's rate of population growth is estimated at 2.5% which is greater than the Welsh average of 1.5%' However, it is not clear over what period this growth will occur, as the average growth per year has been 0.5% since mid-2001. This needs to be explained in more detail.

1.4 The SEA Directive has been transposed in Wales by The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. This should be mentioned for clarity.

2.6 Consultation Query: 'The aim of the review of relevant plans, policies and programmes is to ensure that any overarching sustainability themes are supported by the LDP and to assist in identifying issues and opportunities in the county. Are there any further sustainability themes that the review has not covered that are likely to affect or influence the LDP?'
PPP Review:

Neighbouring authorities development plans, including those of the City and County of Swansea, have not been included within the PPP Review. This is critical in assessing the environmental significance of any potential future transboundary issues and 'in combination' effects (As listed under Annex 11 of the Directive and Schedule 1 of The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004).

Other plans to be included: Planning Policy Wales: Coal MTAN2, Regional Technical Statement and the South Wales Regional Aggregate Working Party annual reports to inform the baseline data for mineral production.

3.16 - Consultation Query: - 'The aim of consulting on the baseline information is to arrive at a consensus on

the main pressures and future trends in environmental, social and economic patterns in Carmarthenshire. This is important in developing sustainability objectives that are relevant to the county that can be used to measure the potential effects of the LDP. Does the identified baseline information adequately represent the issues that you think are of most importance to Carmarthenshire? Has the baseline information been interpreted correctly? Can you assist in providing any further information on issues or trends?

Baseline

3.3 Biodiversity: There is very little data which focuses on Carmarthenshire, most of the information provided relates to Welsh figures. Perhaps more explanation is required relating to the Carmarthenshire BAP.

3.4 Are there any identifiable links between elevated levels of ozone and health and well-being (3.12)(e.g. asthma levels)?

3.6 Sea (bathing) water quality should be included within this section, including data on number of blue flag beaches and level of compliance with EC Bathing Water Directive (specific targets as set out within Directive). Of particular interest at the moment is water quality within the Loughor Estuary and the potential impacts of increased employment/residential land allocations on the SAC features. This would also include examining the potential 'in-combination' and transboundary effects of the City and County of Swansea UDP (Post-Inquiry Modifications).

4. Identifying Sustainability Issues/Environmental Problems: 'Do you think the most important environmental and sustainability issues in Carmarthenshire have been captured? Do the Sustainability Appraisal Objectives that have been developed to test the effects of the plan adequately reflect the identified key issues and challenges?'

There are a large number of key issues (some of which reflect the 12 themes of the SEA Directive as listed under Schedule 2 of the Regulations) and associated objectives. It may be clearer to readers of the report to also relate the key issues to the 5 guiding principles of sustainable development, as outlined within the UK government's Strategy and illustrated on p2 of the Scoping Report.

SA Objectives: A number of objectives do not reflect the land use nature of the document, e.g. to live within environmental limits (1-1), increase levels of literacy and numeracy (in English and Welsh) (12-2) and as such it will be very difficult to monitor the plans' impact on those objectives. The associated indicators are simply statements, e.g. 'level of literacy in adult population'. The majority of indicators do not show a percentage increase/decrease for example (i.e. they are not quantifiable), or in any way illustrate how the performance of the plan can be measured. For example, the decision making criteria in relation to the indicator 'level of numeracy in the adult population' is 'will the LDP contribute to increasing literacy and numeracy levels?' The LDP itself cannot contribute to the increase in literacy and numeracy levels, but it can enable development of educational facilities and promote the community use of such facilities.

Material Assets: Would it be better to provide a separate waste objective as the objectives listed under this heading are very diverse? Objective (13.3) 'Promote sustainable business in Wales'. Should this be re-worded to read 'Promote sustainable business in Carmarthenshire' as the scope of the LDP is limited to Carmarthenshire?

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0019 **Respondent:** Mrs L Dalton **Agent (where used):**

11. Any other comments?

Answer: Having viewed the Non Technical Summary for the above Scoping Report, I have the following comments to make:-
Key Issues 10 and 14 - Population and Social Fabric
If the 'population structure of the county is becoming skewed towards the older age groups' would it not be better to include affordable, purpose-built single storey dwellings on planning applications for any development with 10 or more dwellings, especially in small communities. This could enable the 'older age groups' to downsize but still remain within their chosen community, in turn releasing their existing properties for use by larger households i.e. dwellings currently occupied by one or two people could be made available to households with children.

At present the inclusion of 'affordable housing' on larger developments seems to be allocated as a percentage of small town houses. These are usually erected on the perimeter of the proposed sites and could lead to social problems, resulting in a split community. If all new housing developments were to be built with a mixture of detached houses, bungalows and town houses they could provide a more integrated community, leading to a reduction in criminal acts such as vandalism, break-ins, fly tipping, dog fouling etc. Finally, to keep young people in their chosen community they need employment nearby which would enable them to purchase the affordable dwellings provided by developers. This, together with an upgraded transport system would ease the traffic and pollution problems in the County for all residents, regardless of age.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0020 **Respondent:** Mrs A J M Jones
St Ishmaels Community Council **Agent (where used):**

01. Are there any other relevant policies, plans and programmes that have not been identified?

Answer: Out of town retail parks and developments contribute to the demise of our towns and heritage. Towns are

taken over by fast food outlets, pubs, restaurants, gaming outlets etc. This encourages excess of the sustainable levels regarding food and drink. It can create obesity and also depression especially amongst those who might wish to partake but may not have the finances to do so. Also to see shops and businesses closing down and boarded up has a negative effect on the general public. Llanelli town is a prime example of all these problems.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

02. Do you have, or know of, any additional relevant baseline information which should be added to that already listed?

Answer: Biodiversity The countryside should be treated with more respect and always with nature conservation in mind. Hedgerows and verges are cut until very little growth remains. Berries and nuts etc. which would sustain wildlife are chopped away by machine. Hedges and small trees which stand well away from the road and not interfering with passing traffic are removed indiscriminately leaving woody protrusions in place of a leafy hedge. What can be the purpose of such cuts in Autumn? Roadside verges as mentioned in the Scoping Report 3.3.1 and the species mentioned are not being protected. Hedgerows also provide shelter for wildlife, surely it would be possible to avoid cutting until there's a real requirement for it. The Biodiversity Action Plan mentions coastal sand dunes - there are sand dunes in Ferryside which are being eroded by off road motor bikes and motorists. A simple barrier that only pedestrians could negotiate would help to protect the dunes and the adjacent grassy and wooded area which is rich in flora and fauna. This strip of land is all that protects part of the Carmarthen end of the village from the sea.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

03. Do you agree that the baseline information as set out in table X is relevant, accurate and of sufficient detail to support the LDP?

Answer: Air Quality. By implementing less drastic measures and by reducing the hedge-cutting programme as mentioned in Task 2 a contribution to improving air-quality could be made by saving fuel. Financial costs would also be reduced.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

04. Do you consider there to be any anomalies or inaccuracies with the current collated data?

Answer: Climatic Factors (Government Priority). Although populations in coastal floodplains may be at 'increased risk of inundation', planning permission is being regularly approved in Ferryside. How can this community be knowingly subjected to further risk of flooding? Services already cannot cope. Surface water on roads and overflowing drains are now a regular occurrence throughout the village as rainfall becomes heavier and more frequent.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

05. Do you agree with the sustainability issues identified for Carmarthenshire?

Answer: 5. Water. Consideration for the safety of communities living on coastal or inland flood-plains must be of top priority when considering applications for any development. The need for extra housing should be secondary in these instances as more building will increase the flood risk.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

06. Are there any issues that you would want to see either included or excluded from the list provided?

Answer: 6. Material Assets. Recycling continues to improve in efforts to reduce landfill and to recycle waste. Walking and cycling is dangerous due to increased speed and volume of traffic. More cycle tracks would be welcomed by the public, also more traffic calming measures.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

07. Do you consider that the sustainability objectives identified in X are consistent with national, regional and county level policy / guidance and are appropriate to Carmarthenshire?

Answer: 7. Soil. Good quality soil is regularly being lost to various developments, often in an erratic fashion and usually for large properties which people local to the area cannot afford.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

08. Are there any additional objectives that should be included or should be removed?

Answer: 8. Cultural Heritage. Damage to our cultural heritage is on-going and rapid as in question one, development overrides all other issues.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

09. Do the sustainability objectives and indicators provide an appropriate framework for the Sustainability Appraisal of the LDP?

Answer: Landscape - Objectives 9.2 - To take sensitive locations into account when siting development. Some locations should be protected from any development. It is important to retain amenity areas in central locations which have not previously been developed. An amenity garden opposite Ferryside School was much used and enjoyed by the community. It has now been removed from public use and has become over-grown in the hope that development will be allowed in the future under the LDP. In 2006 it was designated under the UDP as Amenity Land. The well-being and feel good factor which a pleasant environment fosters also promotes good general health in the community and for visitors alike.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

10. Are there other / additional methods that could be used to identify the significant environmental and wider sustainability effects of the LDP?

Answer: Yes, by holding public meetings where representatives from the LDP could give and receive information directly from communities. Generally people do not have the time to study such long documents as the SEA Scoping Report.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

11. Any other comments?

Answer: Affordable housing features prominently in this report. There has been a need for affordable housing since council houses were sold off, yet 4 and 5 bedroomed houses continue to spring up everywhere. I fear that developers will now have permission to build anywhere as long as it's under the heading of 'affordable housing'. There are empty dilapidated houses in towns and villages throughout the county. Councils could make it more attractive for developers to restore these properties. Councils should also cease the sales of council houses and old-age bungalows. Re the Scoping Report it seems that the LDP is not following the criteria in many areas.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

Ref: SAS0021 **Respondent:** Mr G D V Williams **Agent (where used):**
Carmarthenshire Local Access Forum

01. Are there any other relevant policies, plans and programmes that have not been identified?

Answer: Yes - The Sustainability Scoping Report does not appear to have considered the 'Carmarthenshire Rights of Way Improvement Plan' it is not listed as one of the documents taken into account by the consultants. This affects walking, cycling and horseriding.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

02. Do you have, or know of, any additional relevant baseline information which should be added to that already listed?

Answer: Yes. The use of the countryside by public rights of way and open access within the County. It is inconceivable that the 'Walking and Cycling Strategy for Wales' and the 'Tourism Strategy for South West Wales' were apparently considered but not the County's own ROWIP!!!

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

03. Do you agree that the baseline information as set out in table X is relevant, accurate and of sufficient detail to support the LDP?

Answer: No - as it ignores the interests as stated above and hence the LDP and the Sustainability Appraisal is incomplete.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

04. Do you consider there to be any anomalies or inaccuracies with the current collated data?

Answer: Yes. It is incomplete as described above.

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

05. Do you agree with the sustainability issues identified for Carmarthenshire?

Answer: Yes, but only if account is taken of the 'Rights of Way Improvement Plan' which deals also with open access disability; tourism and the sustainability of PROWS

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

06. Are there any issues that you would want to see either included or excluded from the list provided?

Answer: Yes - as above

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

07. Do you consider that the sustainability objectives identified in X are consistent with national, regional and county level policy / guidance and are appropriate to Carmarthenshire?

Answer: Yes - when the PROWIP has been included

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

08. Are there any additional objectives that should be included or should be removed?

Answer: Yes as above

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

09. Do the sustainability objectives and indicators provide an appropriate framework for the Sustainability Appraisal of the LDP?

Answer: No

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process

10. Are there other / additional methods that could be used to identify the significant environmental and wider sustainability effects of the LDP?

Answer: Yes - reconsider the Plan to include the ROWIP

Officer response: that the response be noted

Officer recommendation: That the response be forwarded to JACOBS in order to inform Stage B of the SA/SEA process