

Revised Local 2018-2033 Development Plan

Scoping Report

Sustainability Appraisal /
Strategic Assessment (SA/SEA)

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1. Background

1.1 This Scoping Report has been produced to ensure that the collection of baseline data and plan and programme and policy review, have identified the key environmental/sustainability issues pertinent to Carmarthenshire and that the SA/SEA Framework developed is effective in leading the forthcoming assessment stages of the SA/SEA of the Revised Carmarthenshire Local Development Plan (LDP).

1.2 Its production reflects the statutory the duty to carry out Sustainability Appraisal (SA) incorporating the requirements of Strategic Environmental Assessment (SEA) of its Revised LDP.

1.3 This Scoping Report for the SA/SEA of the Revised LDP is part of an iterative process progressed in parallel with the preparation of the LDP.

1.4 Carmarthenshire County Council has commenced the first review of its adopted LDP with the view to producing a Revised (replacement) Local Development Plan. This process involves a review of the strategy, policies and proposals of the adopted LDP to reflect the changes to the Plan area including its social, environmental and economic considerations as well as the content and outcomes of the LDP Annual Monitoring Reports and any contextual changes emanating from legislation and national policy.

1.5 As the revised LDP progresses through its preparatory stages the role of the SA in guiding and informing the LDP will be central. In this respect the revised Plans preparatory process will adhere to all the requirement in respect of the SA requirements.

1.6 The SA in respect of the Adopted LDP will an important material consideration in monitoring the effectiveness of Plan delivery and in establishing the parameters and scope of any future review.

2. Introduction

SA and SEA

2.1 Sustainability Appraisal is a statutory requirement for Local Development Plans under Section 62(6) of the Planning and Compulsory Purchase Act 2004. The purpose of Sustainability Appraisal is to assess the social and economic effects of the component policies, proposals and strategy elements of the Local Development Plan to ensure that decisions accord with the principles of sustainable development.

2.2 The Welsh Government define sustainable development in Wales through the Well-being of Future Generations (Wales) Act 2015 as:

“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals” (a more comprehensive description of the Act and its goals can be found in Section 5).

2.3 Welsh Government Guidance on the Preparation of Local Development Plans identifies that a Sustainability Appraisal must integrate the requirements of the Strategic Environmental Assessment Regulations. The requirements of EU Directive 2001/42/EC (also known as the SEA Directive) have been transposed into Welsh Law through The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. Strategic Environmental Assessment requires the formal assessment of certain plans and programmes that are likely to have significant effects on the environment; this includes LDPs.

2.4 Sustainability Appraisal is an iterative process; this means that assessment will be carried out at the earliest opportunity on emerging strategy and policy to ensure that the development of the replacement Local Development Plan is informed by the process throughout. The Local Development Plan Manual (Second Edition, 2015) states that:

“Sustainability Appraisal and Strategic Environmental Assessment will play an important part in demonstrating that the LDP is sound by ensuring that it reflects sustainable development objectives. It will contribute to the reasoned justification of policies”.

2.5 The European Strategic Environmental Assessment (SEA) Directive³ states that an environmental assessment must be conducted for statutory plans and programmes, such as when any new Development Plan Documents are prepared. SEA is centred upon identifying physical environmental impacts. Sustainability Appraisal (SA) is a mandatory process⁴ designed to promote sustainable development through the planning process, ensuring that relevant environmental, social and economic issues are considered when new Development Plan Documents (DPDs), such as the Carmarthenshire LDP, are being developed. SA covers economic and social aspects, as well as environmental aspects.

2.6 The aim of the process is to provide for a high level of protection of the environment during plan-making. An important part of the process is to integrate environmental considerations identified during the assessment and consultation phases into the final plan.

2.7 The preparation of the Local Development Plan (LDP) is required by legislative provisions; the implementation of which is likely to have a significant effect on the environment. Consequently, a Strategic Environmental Assessment is required to consider and consult upon the impact of the LDP and to fully integrate environmental considerations into the planning process.

2.8 SEA and SA will be combined into a common process for the Carmarthenshire LDP. This effectively represents a more comprehensive SA, carried out in such a way as to meet the specific and prescribed requirements of an SEA.

The SA/SEA Process

2.9 The stages to Sustainability Appraisal of Local Development Plans are as follows:

- Scoping - setting the context and objectives, establishing the baseline and deciding on the scope;
- Assess Local Development Plan strategic options against the Sustainability Objectives and produce Sustainability Appraisal Report ;
- Assess Local Development Plan policies against the Sustainability Objectives and produce Sustainability Appraisal Report;
- Produce a Sustainability Statement stating how the findings of the Sustainability Appraisal has been taken into account in the final Plan.

2.10 This Scoping Report considers and covers the first stage of the SA process. The scoping report will need to cover a range of information to demonstrate consistency with the SEA Directive. The stages are outlined below in Table 1.

Table 1. Local Development Plan Pre-Deposit Preparation - SA Stage A: Setting the context and objectives, establishing the baseline and deciding the scope

| Replacement LDP Stage | Sustainability Appraisal Stages | Sustainability Appraisal Process |
|---|---|---|
| Key Stage 2: Preparation of SA/SEA Scoping Report | A1: Identifying other relevant policies, plans and programmes, and sustainability objectives. | Brings together a range of information to address potential constraints and influence options. |
| | A2: Collecting baseline information | Helps identify sustainability problems by creating indicators based on gathered evidence. |
| | A3: Identifying sustainability issues and problems | Opportunity to define key issues for the LDP and bring forward any potential tensions or inconsistencies. |
| | A4: Developing the Sustainability Appraisal framework | The framework provides a way in which sustainability effects can be appraised. |
| | A5: Consulting on the scope of the Sustainability Appraisal | Views sought from statutory bodies in 5 week consultation. |

2.11 The consultees and consultation process for the Sustainability Appraisal are set out in the Delivery Agreement.

Table 2: Draft Delivery Agreement – Key LDP Stages

| Stage in Plan Preparation | Timescale |
|---|-------------------------------|
| DEFINITIVE | |
| Key Stage 1 - Delivery Agreement | January 2017 to June 2018 |
| Key Stage 2 - Pre Deposit – Preparation and Participation | October 2017 – October 2019 |
| Key Stage 3 - Pre-Deposit – Public Consultation | May 2018 – January 2019 |
| Key Stage 4 - Deposit LDP | September 2018 – June 2020 |
| INDICATIVE | |
| Key Stage 5 - Submission of LDP to WG for Examination | June 2020 |
| Key Stage 6 - Independent Examination | September 2020 – January 2021 |
| Key Stage 7 - Receipt and Publication of Inspector's Report | June 2021 |
| Key Stage 8 - Adoption | September 2021 |
| Key Stage 9 - Monitoring and Review | Continued following adoption |

2.12 Further detail in relation to the timetable for the delivery of the Revised Carmarthenshire LDP is set out in the Draft Delivery Agreement.

Consultation

2.13 In accordance with the SEA regulations (2004), environmental reports produced by the local planning authority should be subject to a 5 week consultation with the relevant environmental bodies. In Wales, these organisations are:

- Natural Resources Wales (NRW)
- Cadw

2.14 There is no requirement to formally consult on the scope of SA scoping reports, however this document will be published on Carmarthenshire county Council's website, and made available in Council offices throughout Carmarthenshire. Members of the public and interested organisations will be permitted to comment on the content of the scoping report in accordance with Carmarthenshire's Statement of Community Involvement.

2.15 In addition to the statutory consultees, a number of selected organisations will also be written to inviting comments, those organisations of which are listed in Appendix 5 of Carmarthenshire's Delivery Agreement.

2.16 Comments received will be taken forward to inform Stage B of the SA process.

2.17 The consultation of the Local Plan SA Scoping will take place between Wednesday 11th July 2018 and Monday 27th August 2018.

Habitats Regulations Assessment

2.18 Habitats Regulations Assessment is a requirement of the Habitats Directive (92/43/EEC) as set out by the Conservation of Habitats and Species Regulations 2017. The purpose of the Habitats Regulations Assessment (HRA) in this context is to determine if there are any

significant effects arising from the proposed policies on any of the 18 Natura 2000 sites within the Plan area.

2.19 The HRA for the Revised LDP does not form part of the SA process and will be presented in a separate document. Details on the timetable for the preparation of the HRA is set out within the Draft Delivery Agreement.

The County of Carmarthenshire

2.20 Carmarthenshire is the third largest county in Wales covering some 2,365 square kilometres, which represents 11.5% of the total land mass of Wales. Carmarthenshire is a county of contrasts. The agricultural economy and landscape of rural Carmarthenshire is juxtaposed with the urban and industrial south-eastern area. Within the Plan area, the former coal, steel and other heavy industries have left their environmental legacy and now the County is diversifying into a modern economy inclusive of light engineering, new technological and service industries together with other business enterprises.

2.21 With a resident population of 185,610 in 2016, the County accounts for almost 6% of the total population of Wales.

2.22 As a primarily rural County, approximately 60% of the population reside in rural areas. The main urban centres of the County include Llanelli, Carmarthen and Ammanford which are home to 25% of the County's population.

2.23 Due to its central geographic location, Carmarthen typically serves the needs of the County's rural hinterland. There are a number of rural villages and settlements that are self-sufficient in terms of facilities and services, yet other smaller settlements lack services and facilities, meaning that the needs of residents in these areas are typically met by clusters of villages.

2.24 Carmarthenshire has a rich natural and cultural environment, including sites designated at the international level to protect important biodiversity features, as well as striking landscapes and distinctive historic towns and villages.

2.25 The need to deliver social and economic development within the county whilst conserving the county's natural and cultural assets is currently driven by the Carmarthenshire LDP adopted in December 2014. This is set to be superseded by the Revised (replacement) LDP.

The Welsh Language

2.26 The Welsh Language (Wales) Measure 2011 was passed by the National Assembly for Wales and granted Royal assent in 2011. The measure gives the Welsh language official status in Wales which means that Welsh should be treated no less favourably than the English language. It places a duty on some organisations to comply with one or more standards of conduct on their delivery of services through the Welsh language, including, areas such as policy making, the operational activities of the organisation and promoting the Welsh language. Section 26 of the Measure enacted through the Welsh Language Standards Regulations (No.1) 2015 (which apply to National Park Authorities, County and County Borough Councils and the Welsh Ministers) allowed the specification of standards relevant to the particular body. These were set through the Welsh Language Commissioner, under Section 44 of the Measure, with the Compliance Notice setting out the standards with which they would be expected to comply.

2.27 In relation to the preparation of the development plan and in respect of policy formulation the Compliance Notice requires the Authority to consider how a new policy could be formulated (or how an existing policy could be changed) so that the policy decision would either;

- have a positive effect, or an increased positive effect, or
- would not have an adverse effect, or would have a decreased adverse effect, on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the Welsh language.

2.28 It should also ensure that it does not treat the Welsh language less favourably than the English language.

Planning Policy Wales: Edition 9 states:

“The goals set in the Well-being of Future Generations (Wales) Act 2015 include the aim of achieving “a Wales of vibrant culture and thriving Welsh language”. The future well-being of the language across the whole of Wales will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The land use planning system should also take account of the Welsh language and in so doing can contribute to its well-being. The Planning (Wales) Act 2015 contains provisions relating to the consideration of the Welsh language in the appraisal of development plans and in dealing with applications for planning permission.” (paragraph 4.13.2)

“Local planning authorities must consider the likely effects of their development plans on the use of the Welsh language in the Sustainability Appraisal of their plans, and should keep their evidence up to date. All local planning authorities should include in the reasoned justifications to their development plans a statement on how they have taken the needs and interests of the Welsh language into account in plan preparation, and how any policies relating to the Welsh language interact with other plan policies.” (paragraph 4.13.3)

2.29 Reference is made to the provisions of Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017) which provides a further planning framework for the consideration of issues in relation to the Welsh language within a planning context. In this respect and from a development plan perspective the TAN identifies that “one of the issues requiring consideration when preparing a LDP is how the strategy and policies are likely to impact on use of the Welsh language and the sustainability of communities” paragraph 1.4.3.

2.30 TAN 20 also identifies the requirements under the Planning and Compulsory Purchase Act for the SA to include an assessment of the likely effects of the plan on the use of the Welsh language in the area. Paragraph 2.3.1 of the TAN states that the “LDP should give consideration to the use of the Welsh language so far as it is relevant to the use of land. The mechanism for doing so is the SA which takes place during plan preparation. Where relevant to the use of land, the SA should include an assessment of evidence of the impacts of the spatial strategy, policies and allocations on the use of the Welsh language. Where evidence indicates a detrimental impact on the use of the Welsh language or other objectives, the LPA can assess whether the strategy should be amended or mitigation measures should be identified in the LDP.”

2.31 Regard will be had to the guidance contained within Part B – Practice Guidance, of TAN20 in undertaking the SA for the Revised LDP.

Additional Assessments

2.32 In accordance with the provisions of the Local Development Plan Manual (Edition 2)

The SA will where applicable signpost to other assessment where they may be required over and above that contained within the SA. The Revised LDP will be subject to an Equalities Impact Assessment (EIA) as required by the Equalities Act 2010. This will be published as a separate document.

Limitations

2.33 As the LDP is to be developed over a number of years, the baseline data collection and policies, plans, programmes review exercise will need to be considered as 'live'. Any updates to policy or environmental trends in Carmarthenshire will need to be captured in future iterations of the SA/SEA reports and the framework of sustainability objectives will need to be periodically reviewed as the LDP is progressed, to ensure that the framework remains relevant.

3. Relevant Plans, Policies and Programmes

3.1 A review of relevant plans and policies at international/European, national, regional and local level has been undertaken in order to take account of the relationship between the LDP and other relevant policies, plans, programmes (PPP) and sustainability objectives. The Acts, Directives, policies, plans, programmes, reports and reviews have been identified as those that will guide and inform the production of the Revised LDP.

3.2 It should be noted that appended list is not exhaustive and may evolve as the Plan develops. For a list of the identified PPP's and where applicable a more detailed description of the documents and their relevance to the Plan, as well as web links, is set out in Appendix A.

International Summary

3.3 The international (European Union) level legislative instruments and strategies set out and reviewed within Appendix A represents the highest tier of the sustainable development agenda that is then required to be transposed into Member State legislation. National level legislation subsequently conditions the content of plans, policies and programmes at the national, sub-regional and local level that effectively inform the local on-the-ground delivery of the sustainability agenda.

3.4 The European Directives and strategies reviewed concern environmental issues that are of considerable importance at the global scale, yet require localised action to be effective, including:-

- Climate change and renewable energy;
- Establishing sustainable communities;
- Delivering sustainable transport systems;
- Delivering sustainable waste management;
- Using and managing natural resources efficiently;
- Establishing patterns of sustainable production and consumption;
- Promoting social inclusion and fighting poverty;
- Conserving and enhancing biodiversity;
- Conserving and improving the water environment; and
- Air quality.

3.5 Reference is made to transposition of European legislation into national law as a result of the withdrawal of the United Kingdom from the European Union and the implications of the Great Repeal Bill. In this respect the implications and outcomes of the repealing on the one hand the European Communities Act, and on the other hand to transposing of the EU secondary legislation - regulations and directives already enforceable in the UK - into domestic laws will be monitored and the SA amended where appropriate to reflect any impacts.

National Summary

3.6 The sustainability themes covered by the national PPP documents reflect environmental issues important at the international scale, cascaded down to the regional level as well as issues of specific relevance to Wales, particularly with respect to social and economic issues. The social aspects covered by the national level documents include the need to reflect the well-being objectives and deliver safe, inclusive and healthy communities in which social exclusion is minimised and access to facilities is maximised. A strong theme of some of the national level documents is to strengthen cultural identities and to support cultural distinctiveness and the prominence of the Welsh language.

3.7 Responding to local community needs through development is also a theme echoed through a number of the documents. Minimising the need to travel, supported by integrated and healthier forms of transportation is also reiterated by the national policy and strategy documents. The environmental issues covered in the national documents are commonly based upon the need to conserve biodiversity and protected sites and habitats. A strong theme underpinning many of the policies/strategies is to provide the capacity for habitats, species and the natural environment to respond to a changing climate by allowing time and space for adaptation. The need to protect the quality and availability of water resources was also noted during the PPP review. High quality urban design is also cited as a key component of delivering sustainable communities.

3.8 The economic themes of the national documents typically centre upon the need to encourage a more diversified and high value Welsh economy that maximises the country's extensive natural assets. Tourism is a key theme of a number of the national level documents as is the need to move towards capturing renewable technologies markets.

Local Summary

3.9 The sub-Wales and Carmarthenshire level policy documents and strategies also reflect a number of the sustainability themes highlighted in the international and national documents; for example increasing access to services via integrated transport facilities and meeting community needs at the local level.

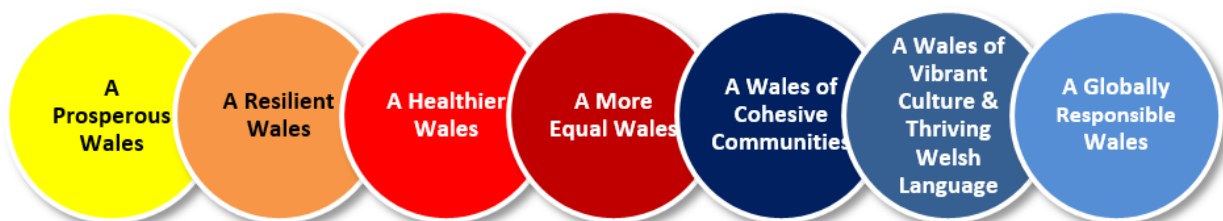
3.10 Local documents such as the emerging Well-being Plan and the Integrated Community Strategy seek to tackle issues pertinent to Carmarthenshire such as exclusion, the need to promote sustainable access to services, delivering safe and healthy communities, promoting education and employment and regenerating and developing the labour market. The need to develop a high value-added and diverse economy also mirrors the policies and strategies set out in some of the national level documents. The need to minimise energy expenditure, use energy efficiently and invest in less damaging sources of energy is a key theme of Carmarthenshire's Climate Change Strategy.

3.11 Following consultation, the Council drafted a set of Well-being / Improvement Objectives. These were approved by Council on 8th March 2017 and re confirmed following the Local Government Elections of 2017. There are also Action Plans in place. These are set out in figure 1 overleaf, with the national well-being goals set out in figure 2.

Figure 1: Carmarthenshire’s Well-being Objectives 2017-2018



Figure 2: National wellbeing goals



Conclusions

3.12 The policies within the Carmarthenshire LDP will need to be consistent with the sustainability themes and aims cited within the PPP documents and to ensure the Council reflects its duties under the Well-being of Future Generations Act. The review has also assisted in identifying sustainability issues in the county that are currently being addressed through specific strategies that the LDP will also need to take particular account of. The collection of baseline information that follows in Section 4 is also intended to further identify sustainability issues that the LDP will need to have regard to.

4. Baseline

4.1 The baseline information for the SA comprises of quantitative and qualitative information and data describing the social, economic and environmental state of the Plan area.

4.2 This section and its baseline information serves two purposes:

- it helps to identify the issues on which the SA should focus, and
- it provides a benchmark against which the performance of the Plan (and the accuracy of any predictions) can be assessed.

4.3 As well as showing the current situation the baseline data shows were possible the situation in the past and projections for the future, in order to indicate trends. As the SA progresses through the assessment of the plan and monitoring, it will be necessary to refine the baseline data and information set. More quantified and precise data and information, relevant to the sustainability objectives will need to be identified and/or acquired.

4.4 The baseline information for Carmarthenshire has been collated under a series of headings and is set out with Appendix B. These heading have in the interests of consistency been grouped under broadly the same headings as that used within the existing adopted LDP. They have however been augmented with the inclusion of the Welsh language as a separate heading reflective of the position of the Welsh language within the County and its communities.

4.5 These baseline headings are as follows:

1. Sustainable Development;
2. Biodiversity;
3. Air Quality;
4. Climactic Factors;
5. Water;
6. Material Assets;
7. Soil;
8. Cultural Heritage and Historic Environment;
9. Landscape;
10. Population.
11. The Welsh language;
12. Health and Well-being;
13. Education and Skills;
14. Economy, and
15. Social Fabric.

Data limitations

4.6 It is noted that the collection of baseline data for Sustainability Appraisal is subject to three difficulties:

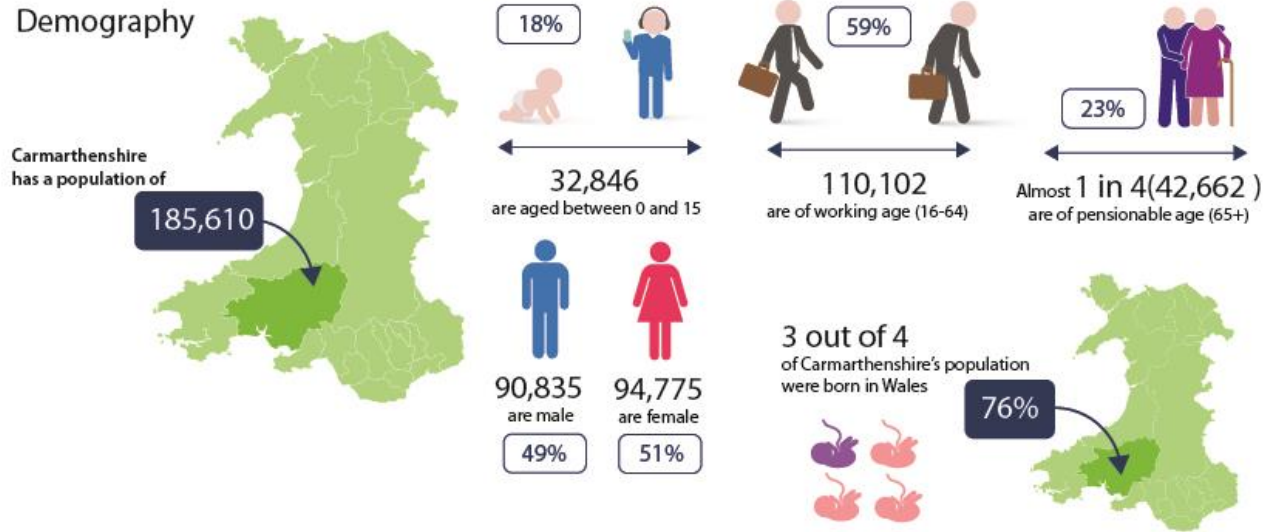
- The data for an issue of interest may not be available, or not have been collected. It may also be that the methodology and the nature of what's collected as part of the dataset has changed since its last publication;
- Timeline for the availability of data - the only data available for an issue may be out of date. Alternatively current data may be available, but there are no historic datasets to identify trends; and

- The geography at which the data is collected or published can have limitation – In this respect even the most localised geographical based data may transcend areas there may also be issues in terms of changes in geographical extent as data is periodically reviewed.

4.7 Furthermore, most of the data used in the baseline has been collected by partners and external bodies, and for purposes that may not be related to sustainability or environmental assessments. The limitations of the data will have implications for the conclusions that can be drawn from the baseline and monitoring. These conclusions should therefore also refer to qualitative information and expert judgement and experience.

4.8 The following provides a 'snap shot' pictorial indication of key baseline data in respect of Carmarthenshire.

Demography



Carmarthenshire has an ageing population.

By **2039**, around **1 in 3** Carmarthenshire residents will be aged **65** and over.



1 in 4

have a limiting long-term illness



1 in 25

Carmarthenshire is predominantly white, with **4%** of the population having a non-white ethnicity.

Carmarthenshire has the highest number of Welsh speakers in Wales at



78,048



There are over **78,800** households in Carmarthenshire.

30% are occupied by just one person.



60% of the population live in rural areas, which form **53%** of the County



6 in 10

There are **three major towns** of **Llanelli**, **Carmarthen** and **Ammanford** which are



home to **25%** of the population.

25%



7 out of 10 households are owned (outright or with a mortgage)



14% are socially rented

10% private rented



44 crimes per **1000** population

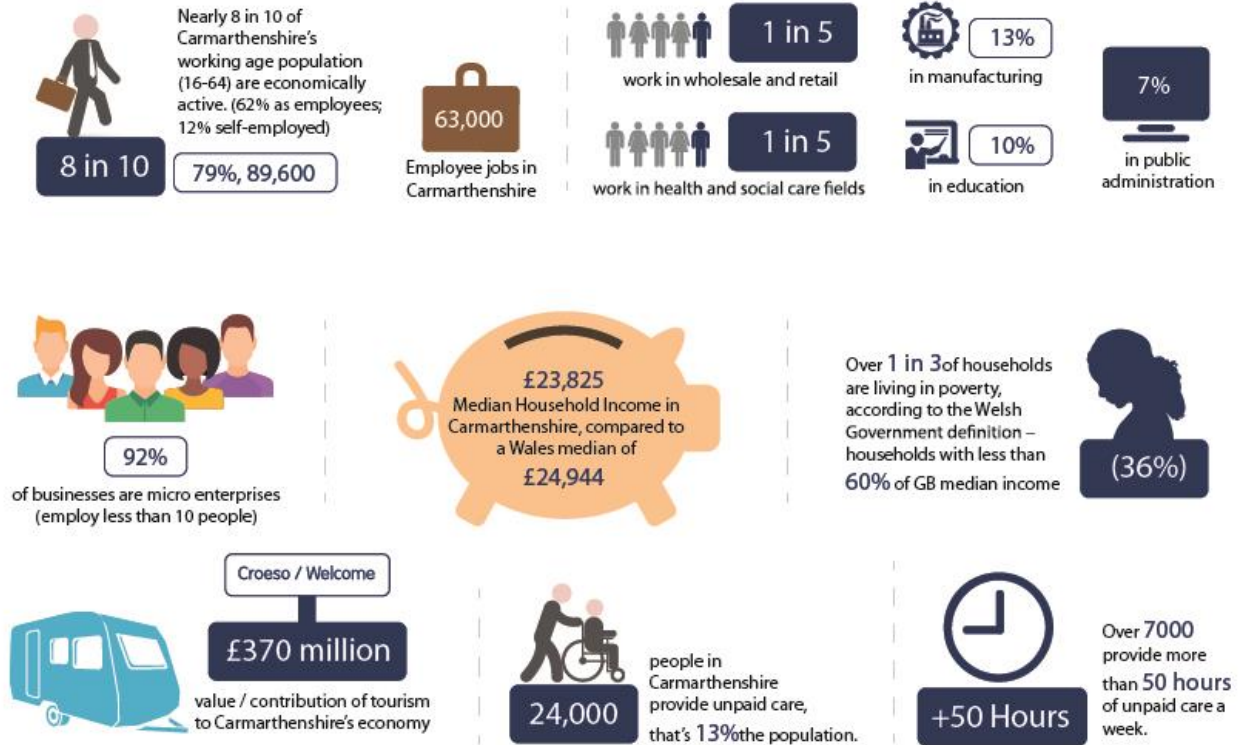


8166 recorded crimes during 2015/16

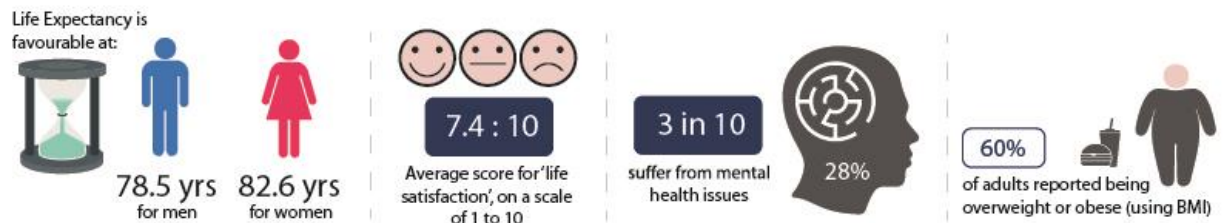


79% feel safe in their area

Economy



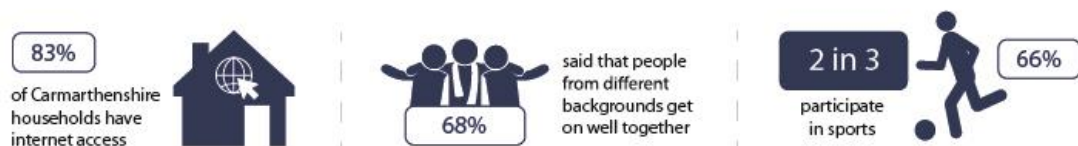
Health and Well-being



Environment



Culture



5. Identifying Sustainability Issues

5.1 The following indicators have informed the identification of the sustainability issues:

- Review of Plans, Policies and Programmes;
- Review of baseline information; and
- Experience of officers in operating within Carmarthenshire and the monitoring outcomes from the Annual Monitoring Report and the implementation of the current Plan policies.

5.2 The sustainability issues and opportunities identified through the above process (as relevant to the context of the LDP) are set out below. Whilst many of the issues reflect those identified during the preparation of the current adopted LDP, they have been updated to reflect relevance and any changes that have emerged. The Welsh language has (in the same way as the baseline) been identified as a separate issue. Whilst subject to appropriate consideration within the SA for the existing adopted LDP, it is considered prudent and necessary to include it as a separate issue for the purposes of this SA. There should not be an over emphasis on these issues as separate of individual matters and many of the themes are interwoven and interrelated – this is particularly the case with the Welsh language.

5.3 It is acknowledged that the key issues and opportunities for Carmarthenshire may change during the Plan preparatory process and into the future as new issues arise and priorities and the baseline change. The analysis of key issues and opportunities will therefore be regularly updated as part of an on-going iterative process. Although a wide array of baseline data has been considered, there may be other trends/issues or updated positions in Carmarthenshire that haven't been identified.

Table 3: Sustainability Issues and Opportunities

| Sustainability Issue and Opportunity | SA Objectives |
|--|--|
| 1 Sustainable Development | |
| The importance of conserving and carefully using natural resources is recognised at international and national level. Carmarthenshire's ecological footprint is currently exceeding sustainable levels with respect to food and drink, energy, capital investment (transport/buildings) and consumables. | 1-1 To live within environmental limits 1-2 To ensure a strong, healthy and just society 1-3 To achieve a sustainable economy 1-4 To remove barriers and promoting opportunities for behavioural change |
| 2 Biodiversity | |
| There are numerous sites of biodiversity value in the county with designations ranging from the international to the local level. These need to be protected and, where possible, enhanced. A significant number of protected sites in Carmarthenshire are identified as being in unfavourable condition, and therefore likely to be highly sensitive to external pressures. | 2-1 To avoid damage or fragmentation of designated sites, habitats and protected species and encourage their enhancement 2-2 To protect, enhance and create appropriate wildlife habitats and wider biodiversity in urban and rural areas |

| | |
|--|---|
| 3 Air Quality | |
| <p>Air quality targets at the European and national level need to be met. Air quality in Carmarthenshire is generally good, however ozone levels can be high in rural areas.</p> <p>There are currently three Air Quality Management Areas (AQMA) within Carmarthenshire. The ongoing implications on the areas themselves and beyond their boundaries is likely to require consideration.</p> | <p>3-1 To maintain/reduce the levels of the UK National Air Quality pollutants</p> <p>3-2 To reduce levels of ground level ozone</p> <p>3-3 To reduce the need to travel, through appropriate siting of new developments and provision of public transport infrastructure</p> |
| 4 Climactic Factors | |
| <p>Climate change is an internationally recognised issue and a key Government priority. Carmarthenshire needs to play its part in minimising impacts on climate change and in being prepared to adapt for the impact climate change may have on the county. In particular, populations within coastal and fluvial floodplains may be at increased risk of inundation.</p> <p>Changes in the distribution of sites that are suitable for the growth of particular agricultural crops may also be anticipated. New development will need to use energy efficiently, and seek to produce energy from renewable or low carbon sources.</p> | <p>4-1 To reduce the emission of greenhouse gases</p> <p>4-2 To minimise the vulnerability of Carmarthenshire to the effects of climate change through making space for water, costal retreat and shifting habitat distribution patterns</p> <p>4-3 To encourage all new developments to be climate resilient</p> <p>4-4 To encourage energy conservation and higher energy efficiency.</p> <p>4-5 To minimise energy consumption and promote renewable energy sources.</p> |
| 5 Water | |
| <p>Biological and chemical water quality is typically good. However pressures on watercourses in terms of previous industrial activity and diffuse pollution from agriculture within the river catchments exist. In addition, surface water and groundwater are used for abstraction for public and industrial supplies. Groundwater levels in the Teifi catchment are declining.</p> <p>There are also quite a high number of homes at risk from flooding. Many of the main settlements in Carmarthenshire developed upon flat, fertile floodplains and consequently a number of settlements are at risk from flooding. In light of climate change, more people are likely to be put at risk of flooding and flood events are anticipated to occur more frequently.</p> | <p>5-1 To ensure water quality of rivers, lakes, groundwater and coastal areas is improved and ensure that the hydromorphological quality of water bodies is maximised.</p> <p>5-2 To protect and maintain water resources in the public supply chain and ensure enough water is available for the environment at all times of year.</p> <p>5-3 To minimise diffuse pollution from urban and rural areas.</p> <p>5-4 To increase water efficiency in new and refurbished developments</p> <p>5-5 To make space for water, and minimise flood risk</p> |

| | |
|---|--|
| 6 Material Assets | |
| <p>Carmarthenshire is a large, predominantly rural county with typically large distances between regional and local centres.</p> <p>Consequently, a high proportion of people travel to work by car and there is reliance upon the private car for accessing services.</p> <p>There has historically been a reliance upon landfilling as a method of waste disposal for controlled waste. However, rates of recycling of municipal waste in Carmarthenshire are just above the national average.</p> | <p>6-1 Minimise the use of finite resources and promote higher resource efficiency and the use of secondary and recycled materials.</p> <p>6-2 Promote the waste hierarchy of reduce, reuse and recycle.</p> <p>6-3 Encourage needs to be met locally.</p> <p>6-4 Promote the use of more sustainable resources.</p> <p>6-5 Improve the integration of different modes of transport.</p> <p>6-6 Promote the use of more sustainable modes of transport (e.g. cycling and walking).</p> |
| 7 Soil | |
| <p>There are few areas of soils of highest agricultural quality. Grade 3 agricultural land in the county is typically associated within river valleys. Soil is an important carbon store and should be conserved.</p> <p>Soils in Wales are typically at risk from acid deposition and eutrophication that may cause critical loads to be exceeded. Areas of contaminated land have been identified by Carmarthenshire County Council. These areas are associated with previously developed/urban land.</p> | <p>7-1 To avoid and reduce contamination of soils and promote the regeneration of contaminated land.</p> <p>7-2 To avoid loss of soils to non-permeable surfaces and minimise soil erosion.</p> <p>7-3 To reduce SO₂ and NO_x emissions and nitrate pollution from agriculture.</p> |
| 8 Cultural Heritage and Historic Environment | |
| <p>There is potential for damage to occur to important archaeological sites and the historic environment within the county from development through both destruction/disturbance of features of cultural heritage importance but also through disrupting the setting of such features.</p> | <p>8-1 To protect historic and cultural assets and local distinctiveness from negative effects of development / regeneration and support their enhancement</p> <p>8-2 To promote high quality design reflecting local character and distinctiveness</p> |
| 9 Landscape | |
| <p>There are several sites designated as of landscape or townscape value within the county. These features need to be protected, and where possible enhanced.</p> | <p>9-1 To protect and enhance landscape/townscape from negative effects of land use change</p> <p>9-2 To take sensitive locations into account when siting development and to promote high quality design</p> <p>9-3 To encourage appropriate future use of derelict land</p> |

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| 10 Population | |
| <p>There is a trend of out-migration amongst young people from the county and the population structure of the county is becoming skewed towards older age groups.</p> <p>The county has a strong Welsh identity, with a high proportion of people residing in Carmarthenshire that were born in Wales. The proportion of the population from ethnic minority groups is low.</p> | <p>10-1 Ensure suitable, affordable housing stock with access to education and employment facilities</p> <p>10-2 Promote the retention of younger people</p> <p>10-3 Promote inclusion of disadvantaged and minority groups into society</p> |
| 11 The Welsh language | |
| <p>Carmarthenshire has the highest number of Welsh speakers in Wales with 78,000 people reporting they could speak Welsh in the 2011 Census, which increased to 80,700 people in the Welsh Language Use Survey 2015.</p> | <p>11-1 Encourage growth of the Welsh language and culture</p> |
| 12 Health and Well-being | |
| <p>A lower proportion of people in Carmarthenshire state that their level of health is generally 'good' and a higher proportion of people live with a long-term limiting illness than the national average. Rates of obesity are also above the national average.</p> | <p>12-1 Create opportunities for people to live active, healthy lifestyles through planning activities</p> <p>12-2 Provide access to health and recreation facilities and services</p> <p>12-3 Encourage walking or cycling as alternative means of transportation</p> <p>12-4 Promote access to Wales' natural and cultural heritage</p> |
| 13 Education and Skills | |
| <p>A high proportion of people in Carmarthenshire have no qualifications, although levels of attainment of 19-21 year olds are just above the national average. Literacy and numeracy rates compare unfavourably against the national average.</p> | <p>13-1 Provide accessible educational and training facilities which meet the future needs of the area</p> <p>13-2 Increase levels of literacy (in English and Welsh) and numeracy</p> <p>13-3 Promote lifelong learning</p> |
| 14 Economy | |
| <p>The dominant economic activities in the county are based around tertiary activities including retail, health care and education with quite a high proportion of manufacturing activities.</p> <p>Employment rates are slightly below average in Carmarthenshire. A relatively low proportion of people work from home.</p> | <p>14-1 To promote sustainable economic growth</p> <p>14-2 To provide good quality employment opportunities for all sections of the population</p> <p>14-3 To promote sustainable businesses in Wales</p> |
| 15 Social Fabric | |
| <p>Rates of rough sleepers are above average in Carmarthenshire. Levels of violent crime, vehicle theft and theft from vehicles are below the national average, however the actual rates have been increasing since 2002. Seven</p> | <p>15-1 Improve safety and security for people and property</p> |

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| <p>LSOAs in Carmarthenshire are in the top 10% of the most deprived LSOAs in Wales. Geographical access to services and employment are the two main domains that contribute to deprivation in Carmarthenshire.</p> <p>The ratio of average house price to average earnings ratio is high, indicating a lack of affordability.</p> | <p>15-2 Promote the design of settlements that improve social fabric by removing barriers and creating opportunities for positive interactions</p> <p>15-3 Promote the delivery of affordable housing</p> <p>15-4 Improve accessibility to services, particularly for disadvantaged sections of society.</p> |
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6. The SA/SEA Framework

6.1 The issues identified in Section 4 along with the resultant sustainability objectives form the Sustainability Assessment Framework. This framework will be used to judge the sustainability of the objectives and policies of the LDP.

6.2 These objectives are intended to indicate directions for change rather than end outcomes and as a consequence no targets are set; rather the goal in the context of Sustainability Appraisal is their realisation. The achievement of these objectives will be monitored through as part of the LDP monitoring process.

6.3 The sustainability framework (see Table 4 below) also shows the main decision-making criteria to be followed in the forthcoming assessment process.

6.4 The SA objectives and proposed indicators may develop as part of an iterative approach reflecting consultation responses and future developments as new issues arise and priorities and the changes in the baseline data. This reflects the length of the LDP preparatory process and the potential for components of the baseline information to change. In addition, the plans, policies and programme review will need to be kept live to ensure that any issues raised by emerging or updated documents are included.

6.5 The sustainability appraisal objectives and indicators will therefore also be reviewed throughout the development of the LDP.

Table 4: SA Framework (including objectives)

| SA Objectives | Decision Making Influences |
|--|--|
| 1 Sustainable Development | |
| 1-1 To live within environmental limits 1-2 To ensure a strong, healthy and just society 1-3 To achieve a sustainable economy 1-4 To remove barriers and promoting opportunities for behavioural change | Will the LDP contribute to reducing resource consumption? Will the LDP encourage needs to be met locally? Will the LDP encourage individuals, companies and businesses to make more sustainable choices? |
| 2 Biodiversity | |
| 2.1 To avoid damage or fragmentation of designated sites, habitats and protected species and encourage their enhancement 2.2 To protect, enhance and create appropriate wildlife habitats and wider biodiversity in urban and rural areas | Are there any designated or non-statutory nature conservation sites that may be affected by the LDP? Is there any evidence of protected species that may be affected? Will there be any opportunities for enhancing or recovering wildlife resources? Will there be any opportunities to create new habitats? |

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| 3 Air Quality | |
| <p>3-1 To maintain/reduce the levels of the UK National Air Quality pollutants</p> <p>3-2 To reduce levels of ground level ozone</p> <p>3-3 To reduce the need to travel, through appropriate siting of new developments and provision of public transport infrastructure</p> | <p>Will the LDP have a positive or negative impact on the existing air quality baseline?</p> <p>Will the LDP increase or decrease the emissions of air pollutants from developments?</p> <p>Will the LDP increase or decrease the emissions of air pollutants from transport?</p> |
| 4 Climactic Factors | |
| <p>4-1 To reduce the emission of greenhouse gases</p> <p>4-2 To minimise the vulnerability of Carmarthenshire to the effects of climate change through making space for water, coastal retreat and shifting habitat distribution patterns</p> <p>4-3 To encourage all new developments to be climate resilient</p> <p>4-4 To encourage energy conservation and higher energy efficiency.</p> <p>4-5 To minimise energy consumption and promote renewable energy sources.</p> | <p>Will the LDP have a positive or negative impact on the emissions of carbon dioxide from new development in the County?</p> <p>Will the LDP contribute to a reduction in carbon dioxide emissions from traditional forms of energy generation?</p> <p>Will the LDP put a larger number of residents at risk of flooding?</p> <p>Are new developments climate resilient?</p> <p>Does the LDP leave room for habitat adjustment and coastal and fluvial flood water?</p> |
| 5 Water | |
| <p>5-1 To ensure water quality of rivers, lakes, groundwater and coastal areas is improved and ensure that the hydromorphological quality of water bodies is maximised.</p> <p>5-2 To protect and maintain water resources in the public supply chain and ensure enough water is available for the environment at all times of year.</p> <p>5-3 To minimise diffuse pollution from urban and rural areas.</p> <p>5-4 To increase water efficiency in new and refurbished developments</p> <p>5-5 To make space for water, and minimise flood risk</p> | <p>Will there be an increase or decrease in the discharge of pollutants to water?</p> <p>Will there be an increase or decrease in water consumption from development?</p> <p>Will the LDP have a positive or negative effect on water quality and hydromorphology?</p> <p>Will it contribute to an increase in flood risk?</p> <p>Will it contribute to a reduction in flood risk?</p> |
| 6 Material Assets | |
| <p>6-1 Minimise the use of finite resources and promote higher resource efficiency and the use of secondary and recycled materials.</p> <p>6-2 Promote the waste hierarchy of reduce, reuse and recycle.</p> <p>6-3 Encourage needs to be met locally.</p> <p>6-4 Promote the use of more sustainable resources.</p> | <p>Will the LDP contribute to increased rates of recycling and higher resource efficiency?</p> <p>Will the LDP ensure that needs can be met locally?</p> |

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| <p>6-5 Improve the integration of different modes of transport. 6-6 Promote the use of more sustainable modes of transport (e.g. cycling and walking).</p> | <p>Will the LDP allow people to make more sustainable transport choices?</p> |
| <p>7 Soil</p> | |
| <p>7-1 To avoid and reduce contamination of soils and promote the regeneration of contaminated land. 7-2 To avoid loss of soils to non-permeable surfaces and minimise soil erosion. 7-3 To reduce SO₂ and NO_X emissions and nitrate pollution from agriculture.</p> | <p>Will the LDP increase or decrease land contamination? Will the LDP result in an increase or loss of good quality soil resources? Will the LDP improve or degrade soil quality? Will the LDP involve development on previously used land?</p> |
| <p>8 Cultural Heritage and Historic Environment</p> | |
| <p>8-1 To protect historic and cultural assets and local distinctiveness from negative effects of development/regeneration and support their enhancement 8-2 To promote high quality design reflecting local character and distinctiveness</p> | <p>Are there any sites of archaeological importance that can be positively or negatively affected by the LDP? Are there any historic landscapes that can be positively or negatively affected by the LDP? Are there any listed buildings that can be positively or negatively affected by the LDP?</p> |
| <p>9 Landscape</p> | |
| <p>9.1 To protect and enhance landscape/townscape from negative effects of land use change 9-2 To take sensitive locations into account when siting development and to promote high quality design 9-3 To encourage appropriate future use of derelict land</p> | <p>Will the LDP have a positive or negative impact on landscapes or townscapes? Will the LDP have a positive or negative impact on designated landscapes? Will the LDP encourage the redevelopment of previously developed land?</p> |
| <p>10 Population</p> | |
| <p>10-1 Ensure suitable, affordable housing stock with access to education and employment facilities 10-2 Promote the retention of younger people 10-3 Promote inclusion of disadvantaged and minority groups into society</p> | <p>Will the LDP increase the provision of affordable housing in Carmarthenshire? Will the LDP contribute to promoting the retention of young people in the county? Will the LDP contribute to social inclusion?</p> |
| <p>11 The Welsh language</p> | |
| <p>11-1 Encourage growth of the Welsh language and culture</p> | <p>Will the LDP encourage the growth of the Welsh language and culture?</p> |

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| 12 Health and Well-being | |
| <p>12-1 Create opportunities for people to live active, healthy lifestyles through planning activities</p> <p>12-2 Provide access to health and recreation facilities and services</p> <p>12-3 Encourage walking or cycling as alternative means of transportation</p> <p>12-4 Promote access to Wales' natural and cultural heritage</p> | <p>Will there be a positive or negative impact on human health?</p> <p>Will access to health services and recreation facilities including natural heritage features be increased?</p> <p>Will the LDP increase opportunities for walking and cycling?</p> |
| 13 Education and Skills | |
| <p>13-1 Provide accessible educational and training facilities which meet the future needs of the area</p> <p>13-2 Increase levels of literacy (in English and Welsh) and numeracy</p> <p>13-3 Promote lifelong learning</p> | <p>Will the LDP contribute to increasing attainment levels amongst young people?</p> <p>Will the LDP promote access to education facilities for all members of the community?</p> <p>Will the LDP contribute to increasing literacy and numeracy levels?</p> |
| 14 Economy | |
| <p>14-1 To promote sustainable economic growth</p> <p>14-2 To provide good quality employment opportunities for all sections of the population</p> <p>14-3 To promote sustainable businesses in Wales</p> | <p>Will there be any adverse economic impacts on land and premises in employment use?</p> <p>Will there be a positive or negative impact on jobs opportunities as a result of the LDP?</p> |
| 15 Social Fabric | |
| <p>15-1 Improve safety and security for people and property</p> <p>15-2 Promote the design of settlements that improve social fabric by removing barriers and creating opportunities for positive interactions</p> <p>15-3 Promote the delivery of affordable housing</p> <p>15-4 Improve accessibility to services, particularly for disadvantaged sections of society.</p> | <p>Will the LDP contribute to making housing more affordable?</p> <p>Will the LDP contribute to creating settlements that are safe and of a high quality urban fabric?</p> <p>Will the LDP contribute to creating healthier homes?</p> <p>Will the LDP maximise access to services and facilities for all members of the community by different modes of transport?</p> |

7. Compatibility Assessments

7.1 It is considered that a high level assessment of the SA Framework as set out in Section 6 against the national and local well-being goals (see figures 1 and 2 previous) provide an opportunity to review and identify those key areas of compatibility.

7.2 Such a review is important in terms of recognising the provisions and requirements of the Well-being of Future Generations Act 2015.

7.3 The outcomes of this assessment provides a timely opportunity to identify those areas where there are particular alignments as well as those areas where there may be an opportunity to develop further linkages.

7.4 As the SA/SEA process moves forward, there will be numerous opportunities to undertake compatibility assessment work, most notably in terms of “testing” the effects of the emerging Revised LDP’s policies and provisions of the Plan on the SA Framework.

7.4 Table 5 undertakes an assessment of the national well-being goals against the SA framework. It is considered that the majority of alignment occurs between those national goals that promote environmental and biodiversity interests.

7.5 Table 6 undertakes an assessment of the Carmarthenshire well-being objectives against the SA framework. In contrast to the findings set out in 7.4 above, it is considered that the majority of alignment occurs between those between those objectives that seek to progress social and economic interests - within an overall emphasis on wellbeing.

7.6 Therefore, whilst there may be opportunities to seek to consolidate and strengthen the SA framework moving forward, there appears to be a natural balance in place in terms of the Framework’s respective alignment with the national wellbeing goals and local objectives when considered together.
















7.7 It should be noted that there is a strong alignment in relation to the welsh language within both tables 5 and 6.

7.8 Table 7 reviews how the Council’s Well-being Objectives contribute to the 7 National Well-being Goals.

Table 5: Assessment of SA Objectives against National wellbeing Goals

| SA Objectives (Headline) | National Wellbeing Goals | | | | | | |
|--|------------------------------|--------------------|-------------------|-------------------|--------------------|---------------------------------|--|
| | A globally responsible Wales | A prosperous Wales | A resilient Wales | A healthier Wales | A more equal Wales | A Wales of cohesive communities | A Wales of vibrant culture and thriving Welsh language |
| 1 Sustainable Development | | | | | | | |
| 2 Biodiversity | | | | | | | |
| 3 Air Quality | | | | | | | |
| 4 Climactic Factors | | | | | | | |
| 5 Water | | | | | | | |
| 6 Material Assets | | | | | | | |
| 7 Soil | | | | | | | |
| 8 Cultural Heritage and Historic Environment | | | | | | | |
| 9 Landscape | | | | | | | |
| 10 Population | | | | | | | |
| 11 The Welsh language | | | | | | | |
| 12 Health and Well-being | | | | | | | |
| 13 Education and Skills | | | | | | | |
| 14 Economy | | | | | | | |
| 15 Social Fabric | | | | | | | |

Table 6: Assessment of SA Objectives against Carmarthenshire Wellbeing Objectives 2017-2018

| | Carmarthenshire Wellbeing Objectives 2017-2018 | | | | | | | | | | | | | | |
|--|---|---|---|---|--|---|---|---|---|---|---|---|---|---|---|
| SA Objectives (Headline) | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 |
| |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1 Sustainable Development | | | | | | | | | | | | | | | |
| 2 Biodiversity | | | | | | | | | | | | | | | |
| 3 Air Quality | | | | | | | | | | | | | | | |
| 4 Climactic Factors | | | | | | | | | | | | | | | |
| 5 Water | | | | | | | | | | | | | | | |
| 6 Material Assets | | | | | | | | | | | | | | | |
| 7 Soil | | | | | | | | | | | | | | | |
| 8 Cultural Heritage and Historic Environment | | | | | | | | | | | | | | | |
| 9 Landscape | | | | | | | | | | | | | | | |
| 10 Population | | | | | | | | | | | | | | | |
| 11 The Welsh language | | | | | | | | | | | | | | | |
| 12 Health and Well-being | | | | | | | | | | | | | | | |
| 13 Education and Skills | | | | | | | | | | | | | | | |
| 14 Economy | | | | | | | | | | | | | | | |
| 15 Social Fabric | | | | | | | | | | | | | | | |

The Carmarthenshire Well-being Objectives 17/18 are:

1. Help to give every child the best start in life and improve their early life experiences;
2. Help children live healthy lifestyles;
3. Continue to improve learner attainment for all;
4. Reduce the number of young adults that are Not in Education, Employment or Training;
5. Tackle poverty by doing all we can to prevent it, help people into work and improve the lives of those living in poverty;
6. Create more jobs and growth throughout the county;
7. Increase the availability of rented and affordable homes;
8. Help people live healthy lives (tackling risky behaviour and obesity);
9. Support good connections with friends, family and safer communities;
10. Support the growing numbers of older people to maintain dignity and independence in their later years;
11. A Council-wide approach to support Ageing Well in the County;
12. Look after the environment now and for the future;
13. Improve the highway and transport infrastructure and connectivity; and
14. Promote Welsh Language and Culture.
15. Building a better council and making better use of resources.

Table 7: Review of how the Council's Well-being Objectives contribute to the National Well-being Goals

| Carmarthenshire's 2017/18 Well-being Objectives / KIOPs | | | 7 National Well-being Goals | | | | | | |
|---|----|--|-----------------------------|------------|-----------|------------|-------------------------|--|---|
| | | | Prosperity | Resilience | Healthier | More equal | Cohesive Communities | Vibrant culture & Global responsibility | |
| Start Well | 1 | Help to give every child the best start in life and improve their early life experiences. | ✓ | | ✓ | ✓ | ✓ | | |
| | 2 | Help children live healthy lifestyles | ✓ | | ✓ | ✓ | ✓ | ✓ | |
| | 3 | Continue to Improve learner attainment for all | ✓ | ✓ | | ✓ | | ✓ | ✓ |
| | 4 | Reduce the number of young adults that are Not in Education, Employment or Training | ✓ | | ✓ | ✓ | ✓ | | |
| Live Well | 5 | Tackle poverty by doing all we can to prevent it, help people into work and improve the lives of those living in poverty | ✓ | | ✓ | ✓ | ✓ | | |
| | 6 | Create more jobs and growth throughout the county | ✓ | | ✓ | ✓ | ✓ | ✓ | |
| | 7 | Increase the availability of rented and affordable homes | ✓ | ✓ | ✓ | ✓ | ✓ | | |
| | 8 | Help people live healthy lives (tackling risky behaviour & obesity) | ✓ | | ✓ | ✓ | ✓ | ✓ | |
| Age Well | 9 | Support good connections with friends, family and safer communities | | | ✓ | ✓ | ✓ | | |
| | 10 | Support the growing numbers of older people to maintain dignity and independence in their later years | ✓ | | ✓ | ✓ | ✓ | ✓ | |
| | 11 | A Council-wide approach to support Ageing Well in the county | ✓ | | ✓ | ✓ | ✓ | ✓ | |
| In a Healthy & Safe Environment | 12 | Look after the environment now and for the future | ✓ | ✓ | ✓ | | | | |
| | 13 | Improve the highway and transport infrastructure and connectivity | ✓ | ✓ | ✓ | ✓ | ✓ | | |
| | 14 | Promote Welsh Language and Culture | ✓ | ✓ | | ✓ | ✓ | ✓ | |
| | 15 | Building a Better Council and Making Better Use of Resources | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

8. Next Steps

8.1 This scoping report has outlined how we intend to undertake the SA of the LDP. Following this, we include a list of questions we would like you to answer when providing consultation responses. A list of questions is provided below:

- Are there any other relevant policies, plans or programmes that have not been identified in this scoping report?
- Do you have, or know of, any additional relevant baseline information which should be added to that already listed in Appendix 2?
- Do you agree that the baseline information as set out in Appendix 2 is relevant, accurate and of sufficient detail to support the LDP?
- Do you consider there to be any anomalies or inaccuracies in the current collated baseline data?
- Do you agree with the sustainability issues identified for Carmarthenshire?
- Are there any issues that you would want to see either included or excluded from the list provided?
- Do you consider that the sustainability objectives as set out in Chapter 5 are consistent with national, regional and county level policy/guidance, and are appropriate to Carmarthenshire?
- Are there any additional objectives that should be included or should be removed?
- Do the sustainability objectives and indicators provide an appropriate framework for the Sustainability Appraisal of the LDP?
- Are there other/additional methods that could be used to identify the significant environmental and wider sustainability effects of the LDP?
- Any other comments relating to the SA/SEA Scoping Report.

8.2 Responses to this consultation should be sent in writing to:

Forward Planning Section,
Environment Department,
7/8 Spilman Street,
Carmarthen,
Carmarthenshire,
SA31 1JY

or e mail: forward.planning@carmarthenshire.gov.uk

or online at www.carmarthenshire.gov.uk by the closing date of Monday 27th August 2018.

8.3 Following the receipt of the consultation comments, they will be reviewed and modifications will be made to the scope of the SA as necessary. Stage B of the SA process comprising the appraisal of the LDP will commence following the refinement of the scope. It is expected that the next consultation on the SA Report will be undertaken alongside the consultation on the draft LDP.