

Revised 2018-2033 Local Development Plan

Habitats Regulations Assessment Addendum Report

2nd Deposit Plan
February 2023

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Abbreviations

(r)LDP	(revised) Local Development Plan (also referred to as the Plan)
AR	Amendment Reference
BBNP	Brecon Beacon National Park
CBEEMS	Carmarthen Bay and Estuaries European Marine Site
CCC	Carmarthenshire County Council
CJEU	Court of Justice of the European Union
DCWW	Dŵr Cymru Welsh Water
FCERM	Flood and Coastal Erosion Risk Management
HRA	Habitat Regulations Assessment
IAP	Interim Action Plan
ISA	Integrated Sustainability Appraisal
JNCC	Joint Nature Conservation Committee
LSE	Likely Significant Effect
LPA(s)	Local Planning Authority(s)
NMB(s)	Nutrient Management Board(s)
NN	Nutrient Neutrality
NRW	Natural Resources Wales
P	Phosphorous
PPP	Plans, Programmes & Projects
SAC(s)	Special Area(s) of Conservation
SAGIS	Source Apportionment Geographical Information System
SAM	Site Assessment Methodology
SAR	Substantive Amendment Reference
SNCB	Statutory Nature Conservation Body
SP	Strategic Policy
SPA(s)	Special Protection Area(s)
SPG	Supplementary Planning Guidance
TAN(s)	Technical Advice Note(s)
WFD	Water Framework Directive
WG	Welsh Government
WRMP	Water Resources Management Plan
WwTW	Wastewater Treatment Works

1 Introduction

- 1.0.1 Carmarthenshire County Council (CCC) is preparing a development plan for the County, referred to as the revised Local Development Plan (rLDP). The rLDP is a land-use plan which outlines the location and quantity of development within Carmarthenshire for a 15-year period between 2018 and 2033, and will replace the existing adopted LDP. The present Habitats Regulations Assessment (HRA) Addendum was published for consultation in February 2023 alongside the 2nd Deposit version of the rLDP and its' accompanying documents, including the Integrated Sustainability Appraisal (ISA) and HRA Report.
- 1.0.2 Over the course of the preparation of the rLDP, which has undergone several iterations, the accompanying HRA (and ISA) process has been carried out in an iterative and integrated manner as part of the plan making process since 2018. This *HRA Addendum* expands upon the findings and recommendations made by the *HRA Report*¹ (published December 2020) and an earlier, informal *HRA Screening Report*² of the Preferred Strategy and the Pre-Deposit, which are required under *The Conservation of Habitats and Species Regulations (as amended) 2017* (hereafter referred to as 'the Regulations')³.

1.1 Purpose of the HRA Addendum

- 1.1.1 The purpose of this assessment is to ensure that all amendments which have occurred since the previously consulted 1st Deposit rLDP (including changes within proposed allocations) are considered in terms of their implications upon the HRA process. Therefore, this document should be read in conjunction with the Second Deposit rLDP (hereinafter referred to as the 'Plan' or 'rLDP') and the HRA Report.
- 1.1.2 This HRA Addendum consists of those prominent changes to the evidence base and relevant information (Chapter 2); a schedule of alterations made to the HRA Report in response to previous consultation (Appendix A); a schedule of Substantive Amendments comprising of those changes made to the Deposit rLDP (Appendix B); where potential HRA implications were identified, these have been appropriately considered (more broadly in Chapter 3 and 4, although phosphate-related site assessment is separately addressed within Appendix C); and finally, an overall summary of these findings (Chapter 5).
- 1.1.3 The assessment contained within this Addendum adheres to the same methodology initially set out in the HRA Report. Wherever possible, signposting to supporting documentation is provided to avoid duplication. Throughout this Addendum, cross referencing with Substantive Amendments outlined in Appendix B is undertaken through Substantive Amendment Reference (e.g., SAR#), whereas numerical references highlight those alterations to the original HRA Report which are attributable to previous consultation and minor formatting as compiled within Appendix A (e.g., Ref #).

¹ Revised Local Development Plan HRA Report. January 2020.

² rLPD HRA Screening Report of the Preferred Strategy. December 2018.

³ [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

1.1.4 The 1st Deposit rLDP was redacted in response to the findings of NRW’s Compliance Assessment of Welsh River Special Areas of Conservation (SAC) Against Phosphorus (P) Targets ⁴, initiated through a recommendation made by the JNCC to adopt tighter targets of associated nutrient pollution ⁵. Following this, Council agreed to the Revised Delivery Agreement timetable and allowed the preparation of a 2nd Deposit rLDP ⁶. This provided time for essential evidence to be gathered and mitigation options to be developed to address the phosphates issue. It has also allowed for consideration of COVID-19, decarbonisation agenda, nature emergency, TAN15, and Future Wales: The National Plan 2040. In essence, this HRA Addendum primarily summarises the changes made to the Plan in response to phosphate guidance and any Likely Significant Effects (LSE) placed upon internationally recognised sites of nature conservation interest (now collectively known as the National Site Network). Nevertheless, where other non-phosphate related alterations have been made to the rLDP, these are also covered here.

⁴ [compliance-assessment-of-welsh-sacs-against-phosphorus-targets-final-v10.pdf \(cyfoethnaturiol.cymru\)](#)

⁵ [Common Standards Monitoring Guidance for Freshwater Habitats | JNCC Resource Hub](#)

⁶ [revised-da-2022-final.pdf \(gov.wales\)](#)

2. Evidential Changes

2.0.1 Table 1 presents key additions/changes to the Plan's evidence base, recent case law, and other relevant information including Plans, Programmes & Projects (PPP) which have since been published following the HRA Report. Where appropriate, the complete evidence base will be publicly accessible online and presented in its entirety during the consultation and examination process.

Table 1 – Changes to the rLDP Evidence Base with relevance to HRA guidance materials since the publication of the HRA Report in December 2020.

Evidence (including Source)	Function	HRA Implications
Planning Policy Wales (PPW). Edition 11. February 2021. Llywodraeth Cymru Welsh Government. Planning Policy Wales - Edition 11 (gov.wales)	PPW sets out the land use planning policies of the Welsh Government, and is supported by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters.	This updated edition has no perceived implication for the HRA.
Habitats regulations assessments: protecting a European site. March 2021. Llywodraeth Cymru Welsh Government. Habitats regulations assessments: protecting a European site GOV.WALES	A guide for competent authorities on the requirements to carry out an assessment under the Regulations.	This guidance has no perceived implication for the HRA apart from aiding the assessment.
NRW. Hatton-Ellis, T., and Jones, T. Compliance Assessment of Welsh River SACs against Phosphorus Targets. Compliance Assessment Welsh SACs Phosphorus (cyfoethnaturiol.cymru)	The assessment showed that of the 9 SAC rivers in Wales, 61% of these were failing to meet their phosphate targets.	Carmarthenshire intersects four catchments of riverine SACs within its boundary, and that are in unfavourable condition or are close to unfavourable condition due to excessive P levels. These include Afon Teifi, Afonydd Cleddau, and Afon Tywi. While 28 of the 43 water bodies of Afon Gwy SAC failed, the portion of the Wye catchment within Carmarthenshire is located within BBNP.
Ricardo (commissioned by CCC). June 2022. Nutrient Mitigation Options Technical Review: Guidance on phosphorus mitigation options for use in Carmarthenshire. Phosphorus Mitigation Review (gov.wales)	A technical review of nutrient mitigation options for use in Carmarthenshire, with a shortlist of mitigation measures that may be appropriate. It concluded that private sewerage drainage fields, wetlands, SuDS and agricultural land-use change are likely to be able to be designed in a manner that will enable predictions of how much P these solutions can remove prior to deploying them.	Supporting evidence for the proposal of mitigation measures.
CCC Nutrient Budget Calculator Nutrient Budget Calculator (live.com) , Nutrient Budget Calculator Guidance: A guide on	A technical calculator and supplementary guide to help developers understand the impact of	Supporting evidence for the proposal of developer-led mitigation measures.

Evidence (including Source)	Function	HRA Implications
how to calculate a phosphorus budget for a development. June 2022 Ricardo (gov.wales)	their scheme so that appropriate mitigations can be included as part of their planning application.	
CCC Nutrient Neutrality Interim Action Plan (IAP). Arcadis (commissioned by CCC). 2023.	The document sets out the proposed Interim Action Plan (IAP) for the delivery of phosphorus mitigation within Carmarthenshire as the rLDP is brought forward for adoption.	Supporting evidence for the proposal of mitigation measures.
River Twyi SAC – application of nutrient neutrality in a headroom catchment. DTA Ecology. (commissioned by CCC). 2022.	This technical document provides advice on the interpretation and application of the Regulations in the light of NRW's phosphate guidance, and details the concept of nutrient neutrality.	Supporting evidence for the application of the Regulations in relation to phosphates, and help shape the proposal of mitigation measures.
NRW. Advisory Note: Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation. October 2022. Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation	NRW's advice to LPAs on how to respond to planning applications affecting P-sensitive riverine SACs, in addition to providing advice for the review of LDPs. As the Statutory Nature Conservation Body (SNCB), this advice is featured heavily within the present Report.	As stated, "policies can be screened out as not likely to have a significant effect in relation to increased phosphorus loading if the associated developments or activities are not a source of phosphorus or there are no pathways for additional phosphorus to enter the river environment".
NRW. Update to phosphorus targets for water bodies in Special Area of Conservation (SAC) rivers in Wales. 2022. Natural Resources Wales / Update to phosphorus targets for water bodies in Special Area of Conservation (SAC) rivers in Wales	Update on the Compliance Assessment of Welsh River SACs Against Phosphorus Targets (2021), with changes to waterbodies and phosphorus targets meaning there is now 127 waterbodies within SAC rivers with a defined P target.	None of these changes affect waterbodies within Carmarthenshire, however, the phosphorus target was reduced in Deepford Brook (headwaters to confluence with Syfynwy, Afonydd Cleddau) in Pembrokeshire (40 (previously 39)).
NRW. Advisory Note: Principles of nutrient neutrality in relation to development or water discharge permit proposals. October 2022. Natural Resources Wales / Principles of nutrient neutrality in relation to development or water discharge permit proposals	Outlining the principles of nutrient neutrality, how it can be achieved, and where must it be applied (i.e., In Carmarthenshire, the whole of the Afon Teifi and Afon Gwy SAC catchment, Part of the Western part Afonydd Cleddau SAC catchment plus two water bodies on the Eastern Cleddau (GB110061030690 and GB110061030660).	Supporting evidence for the proposal of mitigation measures.
JNCC. Afonydd Cleddau/ Cleddau Rivers ;Afon Teifi/ River Teifi ;Afon Tywi/ River Tywi ;River Wye/ Afon Gwy	Detailed information on the qualifying features of the four riverine SACs within the County.	Qualifying features of each riverine European site.

Evidence (including Source)	Function	HRA Implications
<p>SNCB for Wales, Northern Ireland, and Scotland. Guidance for Pollution Prevention Treatment and disposal of wastewater where there is no connection to the public foul sewer: GPP 4. June 2021. Guidance for Pollution Prevention (netregs.org.uk)</p>	<p>Guide for developers and landowners on domestic property or non-domestic property generating domestic-like wastewater - that is not connected to the public foul sewer. Sets out relevant legal requirements and Planning and building controls permissions.</p>	<p>Supporting evidence for developer-led mitigation measures.</p>
<p>WG. August 2022. Written Statement: River Pollution Summit at the Royal Welsh Show. Written Statement: River Pollution Summit at the Royal Welsh Show (1 August 2022) GOV.WALES 2023. Action Plan.</p>	<p>Outlining 8 areas of intervention which were agreed at the Phosphate summit, including the establishment of NMBS; and the promotion of nature-based solutions.</p>	<p>Supporting evidence for the proposal of mitigation measures which are endorsed at the national level. Action plan detailing short to long term actions to deliver upon commitments.</p>
<p>The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Changes to the Habitats Regulations 2017 - GOV.UK (www.gov.uk)</p>	<p>The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change. Changes to the Regulations include the establishment of management objectives for the national site network (the 'network objectives'); and a duty for appropriate authorities to manage and (where necessary) adapt the national site network to achieve the network objectives.</p>	<p>This guidance has no perceived implication for the HRA apart from aiding the assessment – the European Commission's role in the HRA derogation test process is replaced.</p>
<p>Dŵr Cymru Welsh Water (DCWW). Source Apportionment Geographical Information System (SAGIS) Data. SAC Rivers: Source Apportionment Reports Dŵr Cymru Welsh Water (dwrcymru.com)</p>	<p>These suite of reports and models includes SAGIS data relating to Afon Teifi, Usk, Wye, and Afonydd Cleddau (with other Sector source apportionment data for all failing SAC river basins in DCWW's operational area to follow); collaboration opportunities for P reduction; and DCWW SAC P permit programme.</p>	<p>SAGIS data for relevant riverine SACs will be critical in demonstrating the pathways of P pollution and their magnitude. Supporting evidence for the proposal of mitigation measures.</p>
Recent Case Law		
<p>CJEU. 2018. 'the Dutch Nitrogen' Cases I C-293/17 and C-294/17 I Coöperatie Mobilisatie voor het Milieu UA and Others v College van gedeputeerde staten van Limburg and Other</p>	<p>The legal interpretation of the Dutch Case requires LPAs to consider the impacts from new PPP that may generate additional nutrient inputs to European sites.</p>	<p>While these cases involved nitrogen, the rulings can be applied to the context of a range of nutrient loadings. Therefore, at a strategic planning level these cases outline principles for assessing (and mitigating) the phosphorus impacts arisen from the proposed allocations as part of the HRA process, although the nature of development which may be permitted remains specifically assessed on a case-by-case basis.</p>
<p>Royal Courts of Justice. May 2021. 'the Wyatt' case I R Brook Avenue RAD v Fareham BC</p>	<p>The legal interpretation of the Wyatt Case clarified the duty (placed upon the LPA under the Habitats Directive) to take appropriate steps to avoid the deterioration of SACs does not preclude a nutrient neutrality approach to consenting development which would otherwise give rise to further nutrient loading in European sites in unfavourable condition.</p>	<p>While these cases involved nitrogen, the rulings can be applied to the context of a range of nutrient loadings. Therefore, at a strategic planning level these cases outline principles for assessing (and mitigating) the phosphorus impacts arisen from the proposed allocations as part of the HRA process, although the nature of development which may be permitted remains specifically assessed on a case-by-case basis.</p>

Evidence (including Source)	Function	HRA Implications
Royal Courts of Justice. December 2019. 'the Compton' case I Compton Parish Council and others v Guildford Borough Council and another [2019] EWHC 3242 (Admin)	This case exemplified the approach to be taken in assessing critical nutrient loadings when considering if a proposed development would adversely affect the integrity of a SAC that is already subject to excess nutrients, by virtue of the development in question resulting in further nutrient deposition.	
CJEU. 2018. the 'People Over Wind' Case I C-323/17. Environment — Directive 92/43/EEC — Conservation of natural habitats — Special areas of conservation — Article 6(3)	Proposed mitigation measures intended to remediate the adverse effects of a plan on SACs should not be considered at the screening stage for likely significant effect.	Please see above.
Other Plans, Programmes & Projects (PPP)		
The National Strategy for Flood and Coastal Erosion Risk Management in Wales (FCERM). October 2020. Llywodraeth Cymru I Welsh Government.	Replacing the 2011 Strategy, FCERM sets out how WG intend to manage the risks from flooding and coastal erosion across Wales.	
Final Water Resources Management Plan 2020–2050 (Dŵr Cymru) – Final Water Resources Management Plan 2019 Dŵr Cymru Welsh Water (dwcymru.com)	This final version looks at the sustainable management of water resources within Wales.	May require screening within Task 3 to consider in combination effects with other PPP.
Ceredigion, Pembrokeshire Coast National Park, Pembrokeshire, BBNP, Powys LPA – r/LDPs	Land-use plans for respective surrounding LPAs (as later identified)	
Core Management Plan including Conservation Objectives for Afon Tywi / River Tywi SAC September 2022. Conservation Objectives For N2k Sites (Naturalresources.Wales)		
Core Management Plan including Conservation Objectives for Afonydd Cleddau / Cleddau Rivers SAC September 2022. Conservation Objectives For N2k Sites (Naturalresources.Wales)	Updating prevision versions containing revision of water quality targets for river features, clarification of the relationship between Conservation Objectives and Performance Indicators.	May require screening within Task 1/2 to aid the identification and characterisation of European Sites.
Core Management Plan including Conservation Objectives for Afon Teifi / River Teifi SAC September 2022. Conservation Objectives For N2k Sites (Naturalresources.Wales)		

Evidence (including Source)	Function	HRA Implications
Core Management Plan including Conservation Objectives for Afon Gwy / River Wye SAC September 2022. Conservation Objectives For N2k Sites (Naturalresources.Wales)		

2.1 Summary of Evidential Changes

- 2.1.1 The majority of the evidence listed in Table 1 relates to the five riverine SACs whose catchments extends into Carmarthenshire, namely, the Afon Teifi, Afon Tywi, Afon Gwy (Wye), Afon Wysg (Usk) , and Afonydd Cleddau. Where deemed appropriate, site allocations for development within these P sensitive SAC river catchments must now undergo re/screening of with regards to the potential to alter P loadings, dependent on their respective status noted in the Compliance Assessment of Welsh Riverine SACs ⁷ by NRW. SAGIS work undertaken by DCWW⁸ indicates sector sources of P at the waterbody level, and identifies where improvements to WwtW are needed to remove additional P.
- 2.1.2 In light of the above, CCC has commissioned several pieces of work including technical reports which explore a range of remedial mitigation measures potentially suited to the environmental context of the County. It has also invested resources into the feasibility of implementing these solution and their accompanying governance structures to ensure their long-term provision – a summary of this can be found on our [website](#).
- 2.1.3 With regards to the recent rulings of relevant case law, Section 1.1 and 1.2 of the Ricardo Report (2022) ⁹ outline what ‘the Dutch case’ specifically means for the LPA and how *Nutrient Neutrality* (NN) might be achieved. In addition to these rulings outlining principles for assessing and mitigating the P impacts in relation to proposed allocations, multiple guidance documents have been published by NRW to help advise the HRA process and the review of LDPs. Finally, a Written Statement ¹⁰ by the First Minister (and ensuing Action Plan) summarises the approach taken by Welsh Government.

⁷ [Compliance Assessment of Welsh River SACs against Phosphorus Targets - NRW](#)

⁸ [SAC Rivers: Source Apportionment Reports | Dŵr Cymru Welsh Water \(dwcymru.com\)](#)

⁹ [Ricardo Report - CCC](#)

¹⁰ [Written Statement: River Pollution Summit at the Royal Welsh Show \(1 August 2022\) | GOV.WALES](#)

3. HRA Implications of the rLDP Amendments (Screening Stage)

- 3.0.1 This following Chapter screens those amendments made to the rLDP since the previous deposit, in accordance with the legislative requirements outlined within the HRA Report (2020) in Sections 1.2, 1.3 and 1.4 (pages 1 to 4), in addition to the methodology set out in Chapter 2 (pages 6 and 7). In principle, it includes the identification of new screening requirements due to phosphates and rLDP policy updates since the previous deposit, in addition to ensuring all previously screened aspects are updated, where necessary, such as Qualifying Features of the sites. Furthermore, it also covers those changes to site allocations and considers factors such as proximity, situation, layout, and geographical spread, in addition to phasing, to best assess the potential likely effects of the proposed allocations contained within the 2nd Deposit rLDP.
- 3.0.2 In alignment with the provisions made under Regulation 67 of the Regulations, this Addendum will (where appropriate) adopt the reasoning, assessment and/or conclusion of earlier HRA work, to avoid duplication. Additionally, with reference to the CJEU's judgment made in the 'People over Wind' case, this screening stage does not take into consideration any mitigation measures – these will be later considered in Chapter 4.

3.1 Task 1: Identification & Characterisation of European Sites

- 3.1.1 According to Joint Nature Conservation Committee (JNCC) Protected Sites Designations Directory, there have been no further designations (or candidate thereof) added to the National Site Network within the 15km buffer zone around Carmarthenshire. The latest versions of the core management plans for those European sites previously screened within the HRA Report, were confirmed with NRW. While there are updates to four core management plans first referenced within the HRA Report (those published September 2022, see Table 1), no changes to the Qualifying Features within these sites have been made.

3.2 Task 2: Screening of rLDP to identify potential likely effects on European Sites

- 3.2.1 Adhering to the range of effects as listed in paragraph 3.2.1 of the HRA Report, the initial findings of Task 2 featured in the HRA Report have been reviewed and were found to remain appropriate. Nevertheless, the inclusion of material changes in relation to P sensitive SAC catchments has led to the creation of a supplementary effect category (as underlined below). Overall, effects have been screened as those:

- Effects on Aquatic Environment
- Effects on the Marine Environment
- Effects on the Coast
- Effects on Mobile Species
- Recreational Effects
- Effects of increased development:
 - Water Abstraction
 - Discharge of Effluent from Wastewater
 - Air Pollution

- Phosphorous Loading
- Species Disturbance Effects
- Noise & Light Pollution Effects

3.2.2 For clarity, the following subsection introduces and considers the implications of the entire rLDP (not exclusive to those amendments outlined in Appendix A and B) with relation to P sensitive SAC catchments. Subsequently, rLDP amendments will be addressed and, where appropriate, information from both sections will lead into the re/screening of rLDP Policies & Allocations.

Effects of Increased Development: Phosphorous Loading

3.2.3 This section seeks to directly address and screen for those implications associated with development occurring within P sensitive SAC catchments. Nevertheless, the potential impact of increased nutrient loading (including P) is by no means exclusive to these areas. Whilst inherently interlinked, the broader effects attributable to wastewater are deemed to have already been addressed through screening of the 'Effects of increased development: Discharge of effluent from wastewater', in addition to run-off directly related to 'Effects on the aquatic/marine environment', as contained within Section 3.2 of the HRA Report. It was deemed appropriate to make the distinction between this effect and that of wastewater given the inherent spatial element of the discussed effect.

3.2.4 CCC has commissioned Arcadis to produce the *HRA Phosphate Assessment Appendix* which separately addresses the issues concerning Site Allocations and P reduction due to their potential significance. Presented in Appendix C, it rescreens the rLDP with regards to the potential for their Site Allocations to impact upon SACs and (as later discussed in Chapter 4) sets out the proposed avoidance mitigation to prevent any additional input into SACs. It also considers the potential in-combination effects with bordering counties, surrounding agriculture, and other inputs from the wider environment. Conclusions made within the *HRA Phosphate Assessment Appendix* will be summarised in the main body of this Addendum.

3.2.5 In accordance with the ruling made by the 'Dutch Case', new development that is likely to affect designated European sites must remove or offset the additional nutrient loading to comply with the Regulations. This would, therefore, include the requirement to screen for the potential impact created by development (and subsequent habitation) due to the increase in wastewater production and/or the change in land-use resulting in additional nutrient loading into European sites.

3.2.6 Over nutrification is a widespread issue which can lead to eutrophication within aquatic environments – whereby excess nutrients cause an increase in macroalgal and phytoplankton biomass, having secondary impacts across associated trophic levels and causing ecological degradation. The impact pathways are discussed in detail within the accompanying Technical Report ¹¹ and Appendix C, however, the primary sources of excess phosphorus in waterbodies are agriculture (through run-off from animal manure and chemical fertilisers), wastewater, and stormwater – as

¹¹ Technical Report: Carmarthenshire County Council Nutrient Neutrality Interim Action Plan. Arcadis (commissioned by CCC). 2023.

demonstrated in DCWW Source Apportionment Summary on the Afon Teifi ¹². Figure 1 sets out the respective SAC riverine catchments determined by NRW as P sensitive, which intersect the County of Carmarthenshire.

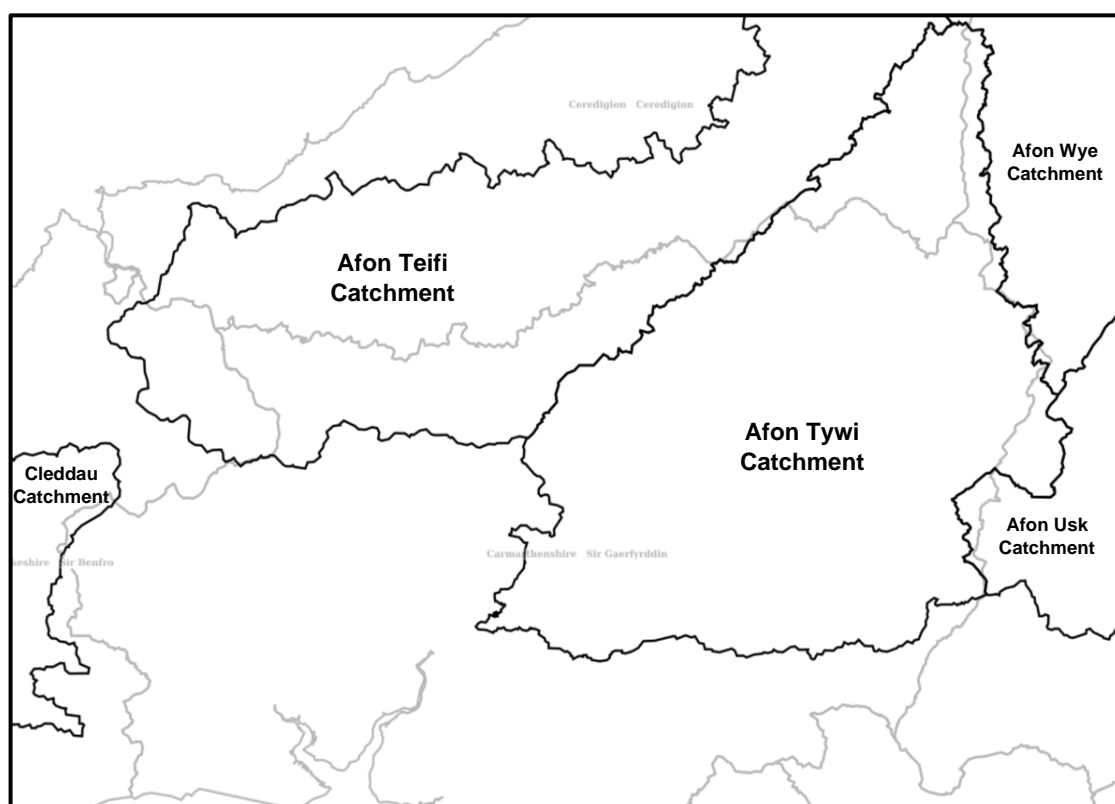


Figure 1. Phosphorus (P) sensitive SAC freshwater catchment map centred on Carmarthenshire. Unlike the respective SACs themselves (see figure 2 within the HRA Report), these catchments effectively set the boundary for where P pollution is likely to have implications upon the concentration of P within the comprising SAC waterbodies, potentially leading to adverse effects. Local authority boundaries in grey. Scale 1:250,000. Obtained from DataMapWales using data sourced from NRW.

3.2.7 Revisions to monitoring guidance set by the JNCC resulted in NRW to review its conservation objectives for riverine freshwater SACs, particularly with respect to P where respective targets were substantially tightened. NRW's subsequent Compliance Report published in January 2021 ¹³ showed that of the 125 waterbodies which make up the 9 SAC rivers within Wales, 61% were found to be failing against their revised P targets (whether annual and/or growing means). Overall, the findings of the report demonstrates that P pollution is a significant problem affecting designated SACs, and that catchment-level action is required given the substantial area which can contribute

¹² [Natural Resource Wales and Dŵr Cymru Welsh Water – Phosphorus Source Apportionment Draft Summary: River Teifi \(Sagis Calibration Summary\). July 2022](#)

¹³ [compliance-assessment-of-welsh-sacs-against-phosphorus-targets-final-v10.pdf \(cyfoethnaturiol.cymru\)](#)

NB: Information contained throughout this subsection which relates to P Compliance and the condition of the discussed riverine SACs (and waterbodies thereof) has been obtained from the above source (unless otherwise stated).

as potential sources to this kind of pollution. In the context of Carmarthenshire, Figure 2 demonstrates the individual status of SAC comprising waterbodies against P targets, respectively.

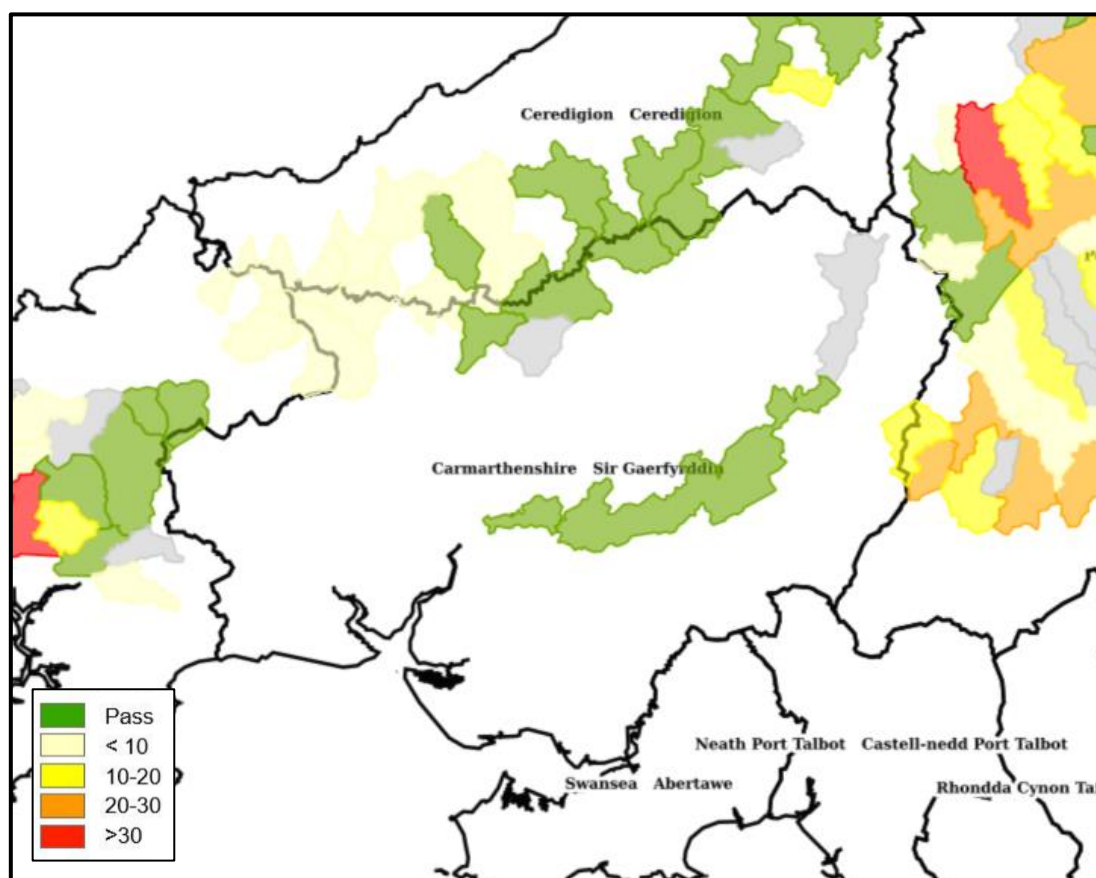


Figure 2. Phosphorus compliance map focused on the riverine SACs within Carmarthenshire. As stated within the Compliance Report, “bodies shaded green pass their target. Other colours fail the target with different colours representing the magnitude of failures in $\mu\text{g l}^{-1}$, expressed as the larger of annual means and growing season means. Greyed out water bodies could not be assessed due to” insufficient data. Scale 1:500,000. Obtained from [DataMapWales](#), using data sourced from NRW.

- 3.2.8 As shown in figures 1 and 2, Carmarthenshire intersects five of P sensitive catchments within its County boundary which have been determined to have various status of compliance. For instance, the $\sim 4.34 \text{ km}^2$ portion of the Afonydd Cleddau catchment to the Southeast (boarding Pembrokeshire) comprises of two waterbodies, both of which passed their targets (GB110061038320 and GB110061038290). Furthermore, there is a $\sim 1.89 \text{ km}^2$ portion of the Afon Gwy (Wye) catchment located to the north of Carmarthenshire (bordering Powys), again comprising of two waterbodies, although GB109055036690 passed and GB109055036680 failed by $< 10 \mu\text{g/l}$ of its target. Whilst the Afon Teifi and Afon Tywi SAC catchments are discussed individually below, the effects under this impact pathway are considered to be exclusive to the catchments themselves. **Therefore, as the portion of the River Usk catchment is located within BBNP (which is under a separate LPA), the River Usk SAC is screened out under this impact pathway.**

3.2.9 The Afon Teifi SAC is in an unfavourable condition due to the failure to comply with the revised P targets (Table 2). For those waterbodies which are within Carmarthenshire, its failures are all in the “low” category which is less than 10 ug/l in exceedance of their targets – which range from 20 to 30 ug/l P. These are all located in the lower part of the catchment, whereas those waterbodies that complied with their P targets are within the upper part of the system. Additionally, there was one waterbody which could not be assessed due to no data (GB110062038980). Nevertheless, despite that there are compliant waterbodies within Carmarthenshire, the hydrology of the catchment means that further development in this area would exacerbate the pre-existing extensive failures in the lower parts of the Afon Teifi.

Table 2. Waterbodies which comprise the Afon Teifi P sensitive SAC catchment that are located within Carmarthenshire, and the status in relation to P targets as set out in NRW’s Compliance Report.

Waterbody ID	Status	Exceedance (ug/l P)
GB110062043565	Comply	-4.21
GB110062043566	Comply	-4.21
GB110062039020	Comply	-13.95
GB110062043563	Fail	0.32
GB110062043564	Fail	0.32
GB110062039041	Fail	8.66
GB110062038980	Not Assessed	NA

3.2.10 The Compliance Report states that “*there are no phosphorus failures in the Tywi*” as it has been demonstrated to pass two out of three of its comprising waterbodies against respective P targets. The local authority sort advice ¹⁴ on whether the NRW Compliance Report data for Afon Tywi satisfies the relevant JNCC Guidelines ¹⁵. It noted that the upper and lower waterbodies are within the JNCC length guidelines, however the middle waterbody (GB110060036250) exceeds the maximum channel length suggested.

3.2.11 Upon consulting NRW, CCC has received response relating to the compliance requirements of non-failing riverine SACs and JNCC Common Standards Monitoring Guidance for Rivers (Appendix D). The response also details additional data that indicates that the upper Tywi water body (GB10060036350) is compliant with WFD targets for P – a finding not present within the Compliance Assessment.

3.2.12 We are currently awaiting source appointment data for the Afon Tywi Catchment and, therefore, there remains a degree of uncertainty at the time of this assessment regarding the characteristics of the sources of P.

¹⁴ See DTA Ecology Advice (Pages 19–20)

¹⁵ [Common Standards Monitoring Guidance for Rivers \(jncc.gov.uk\)](http://jncc.gov.uk)

3.2.13 A summary of the generic screening of European sites identified as potentially vulnerable to effects of increased P loading have been provided in Table 3.

Table 3. Summary of generic level screening of sites identified as vulnerable to increased phosphorus (P) loading.

Sites identified as vulnerable	Further screening required?	Summary of generic level screening
SAC		
Afon Teifi	Yes	Ensure no such effects occur as a result of site allocations and policy.
Afon Tywi		
Afonydd Cleddau		
Afon Gwy (Wye)		
Afon Wysg (Usk)	No	P-sensitive catchment is outside local authority.

Screening of the rLDP Amendments

3.2.14 The screening of the amendments made to the Deposit rLDP is analogous with the previous approach set out in Part F of the Habitats Regulations Assessment Handbook ‘Practical Guidance for the Assessment of Plans’ by DTA. Section F.6.3 introduces ‘screening categories’ against which each policy within a plan should be assessed (page 35 within HRA Report).

3.2.15 Those changes made to Chapters 1–5 and 9–10 (SAR2–4 and SAR7, respectively) of the rLDP comprise of introductory and contextual text which has no perceived possibility of effecting any European Sites. **Therefore, consistent with paragraph 3.2.94 of the HRA Report, the amendments made to these Chapters are screened out screened out of the need for further assessment (Category A).**

3.2.16 The changes defined in SAR5 consists of the alignment of the updated contextual issues to the Plan’s Strategic Objectives. The assessment findings (including screening category) are the same as those detailed in Appendix 3 of the HRA Report. **Therefore, consistent with paragraph 3.2.98 of the HRA Report, the amendments made to the Strategic Objectives are screened out of the need for further assessment.**

3.2.17 The changes made within Chapter 8 of the rLDP (SAR6) sets out the updated preferred strategic growth option and, as such, could be a driver of potential impacts on European sites. **However, consistent with paragraph 3.2.99 of the HRA Report, the implications of change provided for by this framework are more appropriately assessed under later, more specific, policies through which growth will be implemented.** Therefore, in accordance with the guidance provided at section F.6.2.3 of the HRA Handbook which states that “*even if they are the driver of a potential effect, it is likely that the plan will contain a more specific policy or proposal that would be the better target for assessment*”, **this amendment is screened out of the need for further assessment.**

3.2.18 Alterations to policies contained within Chapter 11 of the rLDP are reviewed below.

3.2.19 There are 19 Strategic Policies (SP) within the rLDP. To aid clarity with regards to SAR1, all Strategic Policies have been re-screened as set out in Appendix B. Nevertheless, this additionally addresses the following amendments to SP2 (SAR17–22, SAR23), SP5 (SAR29), SP6 (SAR32), SP7 (SAR33), SP9 (SAR43), SP10 (SAR55), SP14 (SAR60), SP16 (SAR66), and SP18 (SAR75–77). Table 4 summarises the screening outcome of the Strategic Policies.

Table 4. Screening of rLDP Strategic Policies. This replaces Table 16 of the HRA Report. For commentary, please refer to Appendix E. Those highlighted in grey are those considered to be more appropriately assessed under Specific Policies and/or site allocations.

rLDP Strategic Policies	Screening Category	Screening Outcome
SP1: Strategic Growth	G	Screened Out
SP2: Retail and Town Centres	B	Screened Out
SP3: Sustainable Distribution – Settlement Framework	B	Screened Out
SP4: A Sustainable Approach to Providing New Homes	G	Screened Out
SP5: Affordable Homes Strategy	G	Screened Out
SP6: Strategic Sites	C	Screened Out
SP7: Employment and the Economy	G	Screened Out
SP8: Welsh Language and Culture	F	Screened Out
SP9: Infrastructure	B	Screened Out
SP10: Gypsy and Traveller Provision	H	Screened Out
SP11: The Visitor Economy	B	Screened Out
SP12: Placemaking and Sustainable Places	B	Screened Out
SP13: Rural Development	A	Screened Out
SP14: Maintaining and Enhancing the Natural Environment	D	Screened Out
SP15: Protection and Enhancement of the Built and Historic Environment	D	Screened Out
SP16: Climate Change	B	Screened Out
SP17: Transport and Accessibility	B	Screened Out
SP18: Mineral Resources	I	Screened In
SP19: Sustainable Waste Management	B	Screened Out

3.2.20 Consistent with paragraph 3.2.101 of the HRA Report, screening concluded that most SPs are unlikely to have an effects on European sites alone, especially as most seek the protection/enhancement of natural environment or set out design criteria for promoting sustainable development. Additionally, in the case of SP1, SP3, SP4, SP6, and SP7, it was considered that potential impacts would be more appropriately assessed under Specific Policies and/or allocations that would be a better target for assessment, in line with guidance provided in section F.6.2.3 of the HRA Handbook and were, therefore, screened out of the need for further assessment. **Therefore, the amendments made to the Strategic Policies are screened out of the need for further assessment.**

- 3.2.21 Nevertheless, SP18 remains screened in due to a response made by the SNCB during consultation. **Policy SP18 – Mineral Resources will be subject to Appropriate Assessment due to the extant minerals permissions beneath the Ceryydd Carmel SAC and the potential effects on the conservation objectives of Ceryydd Carmel SAC.** Such changes are reflected within the alterations made to the HRA Report (Appendix A). Please refer to Alteration Ref 34, 35, 39, 41, and 42 (NB: SAR76 and SAR77 has not impacted this decision).
- 3.2.22 Alterations to the Specific Policies within Chapter 11 of the rLDP have also been reviewed. The Deposit rLDP now contains 78 Specific Policies, and those which have been re-screened are set out in Appendix F, alongside the relevant SAR indicating the changes undertaken. Screening concluded that the new Specific Policies and the amendments made to existing ones (which were deemed to have possible HRA implications) are unlikely to have any effect on European sites. **Therefore, the amendments made to the Specific Policies are screened out of the need for further assessment.** Please note that this conclusion applies to those amendments made to Specific Policies of which the policies themselves are not re/screened in the following section.

Re/Screening of rLDP Policies

- 3.2.23 Following a precautionary approach, a screening exercise was conducted on the rLDP in its entirety (including rLDP Amendments) against the *Effects of Increased Development: Phosphorous Loading* (as such was not originally considered within the HRA Report). None of the rLDP's Strategies, Objectives, SP, and contextual information were found to affect the integrity of the four identified SACs. The results of the screening of the rLDP's Specific Policies are presented in Table 5.

Table 5. rLDP Specific Policies screened in for further consideration. See Appendix F for further commentary. Those highlighted in grey are screened in as they are potential sources of P.

rLDP Specific Policies	HRA Implications
SG1: Regeneration and Mixed-Use Sites	In accordance with Section F.6.2.3 of the HRA Handbook, the relevant drivers of change provided by these policies were found to be more appropriately assessed through the specific allocations respective to each SAC catchment.
HOM1: Housing Allocations	
HOM3: Homes in Rural Villages	Whilst these policies do not propose allocations for development, they collectively set out the requirements (and, in some instances, support) for planning applications which the ensuing development could be a potential source of P within the screened in SAC catchments.
HOM4: Homes in Non-Defined Rural Settlements	
HOM5: Conversion or Subdivision of Existing Dwellings	
HOM6: Specialist Housing	
HOM7: Renovation of Derelict or Abandoned Dwellings	
HOM8: Residential Caravans	
HOM9: Ancillary Residential Development	

<i>INF5: Rural Allocations outside Public Sewerage System Catchments</i>	
<i>GTP1: Gypsy and Traveller Accommodation</i>	
<i>VE2: Holiday Accommodation</i>	
<i>VE3: Touring Caravan, Camping and, and Non-Permanent Alternative Camping Accommodation</i>	
<i>VE4: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation.</i>	
<i>RD1: Replacement Dwellings in the Open Countryside</i>	
<i>RD2: Conversion and Re-Use of Rural Buildings for Residential Use</i>	
<i>RD3: Farm Diversification</i>	
<i>RD5: Equestrian Facilities</i>	
<i>WM2: Landfill Proposals</i>	
<i>CCH4: Water Quality and Protection of Water Resources</i>	This policy is screened in as it intends avoid/reduce harmful effects upon the aquatic environment (including designated sites). Please refer to Section 3.5.1 of Appendix C.
<i>NE4: Development within the Caeau Mynydd Mawr SPG Area</i>	In accordance with Section F.6.3.12 of the HRA Handbook, this is screened in as it is a bespoke policy which intends to avoid/reduce harmful effects on a Caeau Mynydd Mawr SAC.

3.2.24 The above screening outcome was made in accordance with the SNCB stating that “policies can be screened out as not likely to have a significant effect in relation to increased phosphorus loading if the associated developments or activities are not a source of phosphorus or there are no pathways for additional phosphorus to enter the river environment”¹⁶. Specific reference is given to policy *INF5: Rural Allocations outside Public Sewerage System Catchments* which was additionally screened in accordance with the associated advice for planning authorities¹⁷. Collectively, these policies are considered to be ‘drivers of change’, and are screened in as having a potential LSE alone (Category I) on a precautionary bases as quantifying such effects attributed to the ensuing development would go beyond the scope of the rLPD itself.

3.2.25 On an unrelated matter to P, *NE4: Development within the Caeau Mynydd Mawr SPG Area* has now been screened in and will, therefore, be included within Appropriate Assessment in accordance with Section F.6.3.12 of the HRA Handbook. This is

¹⁶ [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#)

¹⁷ Any LDP policies relating to schemes for private sewage treatment systems should ensure no adverse effects on the integrity of any river SACs where: discharges are direct to surface waters; or discharges are to ground and do not meet the screening criteria set out in this advice. (version 3, July 2022)

because it is a bespoke policy which is designed to avoid/reduce harmful effects on a *Caeau Mynydd Mawr* SAC, particularly development causing habitat fragmentation of *Euphydryas aurinia* (Marsh fritillary) (the primary quality feature of the designated site).

3.2.26 NB: The above findings do not impact the previous screening of SG3: *Pembrey Peninsula*, and the conclusions made within the HRA Report still stand in relation to this specific policy.

Re/Screening of rLDP Allocations

- 3.2.27 This section sets out the screening conclusions for those amendments made to allocated sites listed in *Policies SG1 Regeneration and Mixed-Use Sites, HOM1 Housing Allocations, and EME3 Employment Proposals*. The following findings do not impact the previous screening of all other allocations, and the conclusions made within the HRA Report still stand in relation to those allocations which are not featured in Table 6.
- 3.2.28 Policy *HOM1 Housing Allocations* identifies 192 allocations for the provision of new homes across the County, with 116 of these allocations being provided for under 'commitments' (those with Extant/Full Planning Permission) which have already been subject to assessment under the Regulations at the project stage, including consultation with NRW as the SNCB. Therefore, unless a site features multiple states of planning (e.g., SuV41/h2 and SuV43/h1), those commitment allocations are not subject to screening here (reference is made to Regulation 71 ¹⁸).
- 3.2.29 As outlined in SAR25, there are twenty-nine allocations which have been added since the 1st Deposit, with twenty-five of these being commitments. Rescreening was not undertaken for those allocations which have undergone alteration to the number of dwellings (SAR26-27), unless it is within a P sensitive catchment. Additionally, rescreening was not deemed necessary for SeC8/h3 as this site was initially combined with SeC8/h1, which has been already appropriately screened with the HRA Report.
- 3.2.30 The overall amendments made to *HOM1* has resulted in twenty-five housing allocations which are either re-screened (21) because of phosphate guidance or newly screened (4) because they are allocations which were not previously present during the 1st Deposit. As stated within Appendix C, six of these sites are within the Afon Twyi P sensitive catchment and fifteen within the Afon Teifi. The detailed screening conclusions for each of the housing allocations against each of the potential effect mechanisms are set out in Appendix G, and are summarised below in Table 6.
- 3.2.31 Amendments made to *Policy EME3 Employment Proposals on Allocated Sites* (SAR37) includes the addition of one employment site (PrC2/E2 (i)). The detailed screening conclusions this employment allocation against each of the potential effect mechanisms are also set out in Appendix G, and are summarised in Table 17. Additionally, alterations made to the comprising elements of mixed-use sites contained in SG1 are addressed above accordingly (i.e., PrC2/MU3).
- 3.2.32 As noted in Table 6, only two sites have been screened out of the need for further assessment (SeC1/h7 and SuV49/h1 – following consideration regarding the effects identified from wastewater in alignment with the HRA Report). All other amended allocations have been identified as having a LSE on the integrity of designated sites and will require further Appropriate Assessment (18 solely in regards phosphates. The remaining four identified as having various effects although all are screened in due to effects on aquatic environment from their proximity to watercourses). These will be addressed in Chapter 4.

¹⁸ [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

Table 6 – Revised summary of HRA screening of rLDP new/amended allocations. Please refer to Appendix G for site-specific commentary, with additional commentary for those with P related effects within Appendix C. Y = Yes, N = No. Refer to page 35 of the HRA Report for screening conclusion definition.

Site Reference	Site Name	Aquatic	Marine	Coast	Mobile Species	Recreational	Abstraction	Wastewater	Phosphates	Air Pollution	Disturbance	Screening Conclusion
Employment												
PrC2/E2 (i)	Land east of Calsonic	Y	Y	N	Y	N	N	N	N	N	Y	I
Cluster 1												
SuV12/h2	Llandre	Y	Y	N	Y	N	N	N	N	N	Y	I
SeC1/h7	Land off Heol Glyndwr	N	N	N	N	N	N	N	N	N	N	K
SuV17/h1	Rear of former joinery, Station Road	N	N	N	N	N	N	N	Y	N	N	I
Cluster 2												
PrC2/MU3	Former YMCA, Stepney Street	Y	N	N	N	N	N	N	N	N	N	I
Cluster 4												
SeC12/h1	Trem Y Ddol	N	N	N	N	N	N	N	Y	N	N	I
SeC12/h3	Land rear of Dolcoed	Y	Y	N	N	N	N	N	Y	N	N	I
SeC13/h1	Adjacent Y Neuadd	N	Y	N	Y	N	N	N	Y	N	N	I
SeC14/h1	Blossom Garage	N	N	N	Y	N	N	N	Y	N	Y	I
SeC14/h2	Land adjacent Maescader	N	N	N	N	N	N	N	Y	N	N	I
SuV33/h1	Land opposite Brogeler	N	N	N	N	N	N	N	Y	N	N	I
SuV35/h1	Land adjacent Arwynfa	N	N	N	N	N	N	N	Y	N	N	I
SuV36/h1	Cae Pensarn Helen	N	N	N	N	N	N	N	Y	N	N	I
SuV36/h2	Land at Bryndulais	N	N	N	N	N	N	N	Y	N	N	I

Site Reference	Site Name	Aquatic	Marine	Coast	Mobile Species	Recreational	Abstraction	Wastewater	Phosphates	Air Pollution	Disturbance	Screening Conclusion
SuV37/h2	Land south of Cae Coedmor	N	N	N	N	N	N	N	Y	N	N	I
SuV37/h3	Land adjacent to Lleinau	N	N	N	N	N	N	N	Y	N	N	I
SuV38/h1	Maes y Bryn	N	N	N	N	N	N	N	Y	N	N	I
SuV39/h1	Adjacent Yr Hendre	N	N	N	N	N	N	N	Y	N	N	I
SuV41/h2	Cilgwyn Bach	N	N	N	N	N	N	N	Y	N	N	I
SuV43/h1	Blossom Inn	N	N	N	N	N	N	N	Y	N	N	I
Cluster 5												
SuV49/h1	Awel y Mynydd	N	N	N	N	N	N	N	N	N	N	K
SeC15/h2	Land adjacent to Bryndeilog, Tywi Avenue	Y	Y	N	Y	N	N	N	Y	N	Y	I
SeC17/h2	Land off Heol Pendref	N	N	N	N	N	N	N	Y	N	N	I
SeC17/h1	Land opposite Llangadog C.P School	N	N	N	N	N	N	N	Y	N	N	I
SuV51/h1	Land opposite Village Hall	N	N	N	N	N	N	N	Y	N	N	I
SeC16/h1	Llandeilo Northern Quarter	N	N	N	Y	N	N	N	Y	N	Y	I

3.3 Task 3: Consideration of In-Combination Effects With Other Plans, Programmes & Projects

- 3.3.1 As detailed within the HRA Report (see page 45), Article 6(3) of the Habitats Directive requires the potential for plans to have a significant effect either individually or in-combination with other PPP. This following Section supplements the previous findings of Task 3 in the HRA Report by considering necessary rLDP amendments and other PPP.
- 3.3.2 All rLDP policies and allocations which have been thus far screened out have been assigned to a screening category which allows them to be recognised as unlikely to have a significant effects, either alone or in-combination (i.e., H and those preceding).
- 3.3.3 Where a proposal has been deemed to have likely significant effect alone (category I), it does not need to be screened for in-combination effects as the Regulations state that likely significant effects should be determine either alone 'or' in-combination (not both). Only those appraised amendments which have been assigned category J would require further assessment of the potential for effects in-combination. As such, no further 'in combination' assessment is required at this stage in respect of the amendments made to the rLDP policies, as per Part F.6.3.11 of the HRA Handbook.
- 3.3.4 With regard to rLDP Site Allocations and those proposed allocations within other PPP, please refer to Chapter 3.6 within Appendix C for the assessment of P-related, in combination effects. In summary, those currently allocated sites within the respective LPDs for neighbouring Ceredigion and Pembrokeshire LPA have been included in the nutrient budgets to quantify the in-combination effect on the Afon Teifi SAC. No in-combination assessment is required for Afon Tywi SAC.

3.4 Task 4: Screening Assessment Summary

3.4.1 In line with the screening requirement of the Regulations, an assessment was undertaken to determine the potential LSE of the amendments made to the rLDP on the integrity of the outlined European sites. The screening decisions included within the present Addendum were informed by:

- Responses made to previous consultation of the HRA Report (as addressed by those post-publication alterations in Appendix A);
- The review of the amendments made to the Deposit rLDP (Appendix B); those determined to have possible HRA implications were screened/re-screen accordingly (Appendix E to G);
- NRW Guidance which dictates Site Allocations must be screened in as having a LSE due to the increase in volume and P concentration of wastewater (as discussed in Appendix C). In addition, to those policies relating to private sewage treatment systems (i.e., INF5) or those which may indirectly alter P loading.

3.4.2 In summary, **the screening assessment of the 2nd Deposit rLDP found a total twenty-one policies which have the potential to have LSE on European sites either alone or in combination. These are:**

- **SG3: Pembrey Peninsula (as originally noted within the HRA Report);**
- **SP18: Mineral Resources (at request of consultee, Appendix A);**
- **CCH4: Water Quality and Protection of Water Resources (identified in Appendix C);**
- **Those eighteen Specific Policies listed in Table 5.**

3.4.3 Supplementary to the seven potential significant effects outlined in Paragraph 3.4.2 and 3.4.3 of the HRA Report (including Ref 39), the following will now be screened in for Appropriate Assessment:

- **Increased P loading within the Afon Tywi, Afon Teifi, Afonydd Cleddau, Afon Gwy (Wye) P sensitive catchments, with potential effects placed upon respective SACs.**

3.4.4 The re/screening exercise of new/existing allocations found identified an additional twenty-five housing and one employment allocation(s) which could have LSE(s) on the integrity of designated sites. Please note that these are in addition to those originally identified within the HRA Report (including those outlined in Ref 38).

4. Appropriate Assessment

4.0.1 For clarity, this following Chapter is in addition to the conclusions made in the HRA Report (incorporating alterations Ref 41 to 43). It will also summarise upon the Appropriate Assessment within Appendix C (Chapter 4).

4.1 Summary of Screening Conclusion

4.1.1 Following the screening exercise in Chapter 3, **it has been identified that there is the potential for an additional LSE of the rLDP in respect of:**

- **Increased P loading within the Afon Tywi, Afon Teifi, Afonydd Cleddau, Afon Gwy (Wye) P sensitive catchments, with potential effects placed upon respective SACs.**
- **Policy SP18: Mineral Resources due to the extant minerals permissions beneath the Cernydd Carmel SAC and the potential effects on the conservation objectives of Cernydd Carmel SAC.**

4.1.2 New allocations limited to those amendments made to *SG1: Regeneration and Mixed-Use Sites* (i.e., PrC2/MU3), *HOM1: Housing Allocations* (i.e., SuV12/h2) and *EME3: Employment Proposals* (i.e., PrC2/E2 (i)) were also identified to have LSE(s). However, each of these three sites identified are deemed to have been appropriately addressed by Chapter 4 of the HRA Report as they are analogous with the previous LSE identified. This is equally true for those additional LSE outlined within the rescreened allocations (excluding those LSE attributed to P loading). In these described instances, the previous Appropriate Assessment contained within the HRA Report (as amended by Appendix A) was deemed sufficient.

4.1.3 **The Appropriate Assessment of the potential adverse effects associated with SP18: Mineral Resources can be found in Ref 41 and 42 (Appendix A).** Additionally, a review of the Appropriate Assessment that specifically relates to habitat fragmentation effects on Caeau Mynydd Mawr SAC was found to remain sufficient (see Table 18 and paragraph 4.3.23 in the HRA Report). For clarity, the initial decision to screen out *NE4: Development within the Caeau Mynydd Mawr SPG Area* was an oversight of the initial HRA Report and, as a bespoke protective policy against such effects, no additional Appropriate Assessment was deemed necessary.

4.2 Incorporation of mitigation measures to avoid adverse effects

- 4.2.1 Given the overall remit of the rLDP (as a plan), this Section provides an essential overview by which the ‘screened in’ elements (including allocations) can be later implemented without impacting the integrity of the identified European Sites or requiring derogations, in line with the Regulations. Whilst supplementary to Table 18 within the HRA Report, this Section focuses on those the potential mitigation measures which might be relied upon to avoid adverse effects associated with increased P loading.
- 4.2.2 In recognition of the technical nature of the discussed impact pathway, the local authority has consulted stakeholders and specialist consultants with relevant expertise to provide guidance in the formulation of potential mitigation measures (extracts and/or signposting has been provided, where necessary). This has resulted in the production of the Interim Action Plan (IAP), Appendix C, and other associated documents listed in Table 1.
- 4.2.3 As stated in Section C.5.1 of the HRA Handbook:
- “5. To be taken fully into account... all ‘mitigation measures’ should be effective, reliable, timely, guaranteed to be delivered and as long-term as they need to be to achieve their objectives.”*
- “6. Any doubts about the effectiveness, reliability, timing, deliver or duration of mitigation measures, should be addressed by the competent authority before relying on such measures when applying the integrity test.”*
- “7. Mitigation measures proposed by the plan maker ... must be incorporated into the plan so that they are integral parts of it, and they are guaranteed to be delivered. Mitigation measures of this type of referred ... as ‘incorporated mitigation measures’”*
- 4.2.4 Section F.10.1.2 of the HRA Handbook further outlines the conditions for ‘policy caveats’ which must be “case-specific”, “explicit”, and “added to the policy” wording itself “and not... to the explanatory text”.
- 4.2.5 In consideration of the above, it is CCC’s position that relevant rLDP policy amendments, alongside a deliverable package of mitigation measures appropriately managed in perpetuity, would be sufficient to demonstrate no adverse effect. It will undertake this collaboratively through the formulation of a Nutrient Management Board (NMB) for each respective SAC catchments which will oversee the strategic delivery of the solutions evidenced in Chapter 4 within Appendix C.
- 4.2.7 Appendix C details the Appropriate Assessment associated with Site Allocations that require mitigation, in addition to the in-combination effects of sites contained within neighbouring Ceredigion and Pembrokeshire LDPs, and Policy CCH4. Therefore, the proceeding subheading seeks to address those Specific Policies (highlighted in grey, Table 5) which could feasibly increase P loading within the Afon Tywi, Afon Teifi, Afonydd Cleddau, Afon Gwy (Wye) P sensitive SAC catchments.

4.2.8 Adhering to the mitigation hierarchy outlined within TAN 5¹⁹, the implementation of avoidance measures (as defined in Paragraph C.5.4.1 HRA Handbook) are discussed below. Firstly, it considers an overarching rLDP policy amendment, and then ensuing mitigation.

rLDP Policy Amendment

4.2.9 *CCH4: Water Quality and Protection of Water Resources* has been revised to act as an avoidance measures for the screened in Specific Policies (in addition to Site Allocations – see Appendix C). Please refer to SAR70 for previous wording, it now sets a restriction for the permission of planning applications on the basis that there is no adverse effect on the integrity of P sensitive riverine SACs.

CCH4: Water Quality and Protection of Water Resources

Development proposals must make efficient use of water resources and, where appropriate, contribute towards improvements in water quality. Proposals will be permitted where they do not have an adverse effect upon water resources, water quality, fisheries, nature conservation, public access, or water related recreation use in the County.

Where appropriate, SuDS must be implemented with approval required through the Sustainable Drainage Approval Body (SAB).

Proposals will be supported if they promote the safeguarding of watercourses through ecological buffer zones or corridors, protecting aspects such as riparian habitats and species, water quality, and providing for flood plain capacity.

Development will only be permitted if it can be demonstrated that there is no adverse effect on the integrity of phosphorus sensitive riverine Special Areas of Conservation (SACs). In the hydrological catchment area designated for riverine SACs, development creating wastewater discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC. This can be achieved through implementation of mitigation measures and associated supplementary planning guidance. Where evidence demonstrates that adverse effects on the integrity of river SAC can be avoided or offset using mitigation, these must be agreed with the Council on a case-by-case basis, in consultation with NRW.

4.2.10 The strengthening of *CCH4: Water Quality and Protection of Water Resources* is seen to remediate the potential adverse effects associated with those Specific Policies (highlighted in grey) within Table 5. Nevertheless, in the interest of specificity, “*development creating wastewater discharges*” is not the only pathway for potential harm – especially when applied in context to the development associated with *RD3: Farm Diversification*, *RD5: Equestrian Facilities*, and *WM2: Landfill Proposals* where diffuse run-off, for instance, may be the primary pathway. As a recommendation, policy wording could be further revised to be inclusive of all pathways (e.g., wastewater and diffuse run-off).

¹⁹ [Technical Advice Note \(TAN\) 5: Nature Conservation And Planning](#)

- 4.2.11 As a recommendation, any effects associated with the development of private sewage treatment systems as a result of *INF5: Rural Allocations outside Public Sewerage System Catchments* could be further mitigated by directly referencing in the policy wording that '*such infrastructure will only be permitted if it can be demonstrated that there is no adverse effect on the integrity of phosphorus sensitive riverine SACs*'. Furthermore, policy wording may also seek to assure that the allocation in its entirety utilises a single private system, where appropriate, as the proliferation of private plants may cause environmental issues (whilst, this is currently mentioned within the explanatory text, as it is a policy caveat it should be added to the policy wording itself – in accordance with Section F.10.1.2 of the HRA Handbook).
- 4.2.12 The preparation of '*Further Water Quality – Protected Riverine SACs*' Supplementary Planning Guidance (SPG) will support *CCH4: Water Quality and Protection of Water Resources*. Through collating and expanding upon the options for mitigation measures discussed under the next subheading, this SPG will consist of an integrated suite of guidance documents to assist development proposals in demonstrated that the ensuing development will cause no adverse effect on the integrity of riverine SACs – particularly due to P. Additionally, it will elaborate on planning obligations and other mechanisms of funding to ensure the implementation of the mitigation measures.

Mitigation Measures

- 4.2.13 As a consequence of potential development resulting from the Specific Policies (highlighted in grey, Table 5), the effects placed upon Afon Tywi, Teifi, Gwy (Wye) and Afonydd Cleddau are dependent on the nature of the proposed development implemented and, as such, their magnitude goes beyond the scope of the rLDP itself. With specific regards to policy, the reliance on the aforementioned amendments to *CCH4: Water Quality and Protection of Water Resources* is believed to demonstrate compliance with the Regulations.
- 4.2.14 Full reference is made to Appendix C which details the specific mitigation measures for Site Allocations. Signposting also is given to the IAP and Guidance on P mitigation options ²⁰. As discussed in Section 4.3.1 of Appendix C, the IAP demonstrates compliance with the Regulations by outlining mitigation measures (primarily Nature Based Solutions) which will uphold Nutrient Neutrality (NN) and prevent any adverse effects on the conservation objectives of the riverine SACs.
- 4.2.15 The requirement for NN within the Afon Teifi P sensitive SAC catchment, which is currently in an unfavourable condition due to nutrients, is required by the SNCB ²¹. Nevertheless, it is CCC's position that NN is applied to all P sensitive SAC catchments. While Appendix C summarises a 'strategic approach' for Afon Tywi and Afon Teifi, analogous 'developer led' solutions for mitigation (associated with development proposed through the identified Specific Policies) may be brought front to ensure no adverse effect is placed on Afon Gwy (Wye) and Afonydd Cleddau. This has been supported through the production of a dedicated P calculator ²² and associated technical guidance ²³.
- 4.2.16 To facilitate the delivery of development which may be affected by *CCH4: Water Quality and Protection of Water Resources*, CCC have prepared 'the 'Afon Tywi and Afon Teifi Phosphorus Reduction Strategy'. This document sets out the strategic approach for delivering P reductions in these two catchments while also facilitating growth and demonstrating that mitigation can be delivered in practice. The document sets out a range of measures, which have been agreed in consultation with NRW. The 'Afon Tywi and Afon Teifi Phosphorus Reduction Strategy' are living documents that will develop during the lifetime of the rLDP, in consultation with NRW.
- 4.2.17 The delivery of the 'Afon Tywi and Afon Teifi Phosphorus Reduction Strategy' will be supported by the formation of the Afon Tywi, Teifi and Cleddau Nutrient Management Boards (NMB's). NMBs will have wider duties with a broader aim to deliver the long-term solutions on a catchment basis, both to address the issue of excessive P in rivers, generated from existing activities and land uses in the wider catchment (in align with Regulation 16A), and to identify measures which might be relied upon to deliver wider benefits and net reductions across the catchment. Whilst these measures are outside the scope of the rLDP, there are important for ensuring a holistic and robust approach

²⁰ [Phosphorus Mitigation Review \(gov.wales\)](#)

²¹ [Natural Resources Wales / Principles of nutrient neutrality in relation to development or water discharge permit proposals](#)

²² [CCC Nutrient Budget Calculator](#)

²³ [Phosphorus Mitigation Review \(gov.wales\)](#)

in reducing P and safeguarding the discussed riverine SACs from further P effects attributed from all source sectors.

- 4.2.18 CCC leads the Tywi NMB and is a key member within the Teifi and Cleddau NMBs alongside the affected neighbouring LPAs. The Tywi NMB was officially formed on 17th March 2022 and has held two board meetings since, although its terms of reference are yet to be agreed amongst its members. As a principal intervention agreed upon at the P summit, Welsh Government have committed to funding the work of NBM until 2025²⁴. Additionally, similar collaboration is held with the LPAs associated with the Afon Gwy (Wye) NMB which was established in 2014. For reference, CCC is also a member of the Usk Catchment Partnership; an alternative to a NMB structure with wider goals, facilitated by BBNP.
- 4.3.19 Please note, in line with the emergence of further work currently undertaken/proposed, further iterations of the IAP and Appendix C will be developed. This reflects CCC's commitment to ensuring the rLDP is based not only the most up to date information but that its content is appropriately and thoroughly assessed in terms of the effects identified on designated sites – notably through the examination process. Any further iterations will be provided to statutory consultees for further comment, and will be made publicly available (upon request).

²⁴ [Written Statement: River Pollution Summit at the Royal Welsh Show \(1 August 2022\) | GOV.WALES](#)

Alternatives to Nutrient Neutrality

- 4.2.20 As detailed in advice obtained from DTA Ecology (2022), when nutrient targets are not exceeded there is no requirement under the Regulations to constrain development unless a proposal (whether alone or in combination) represents a threat to the integrity of a site. Therefore, proposed development within non-failing catchments which can demonstrate not cause the failure of P targets will have no adverse effect to site integrity, under this impact pathway.
- 4.2.21 CCC recognises that the Regulations do not require NN to be applied to SACs which are not in unfavourable condition due to nutrients (i.e., Afon Tywi) (as drawn from advice from the SNCB ²⁵ and DTA Ecology ²⁶), however, as a precautionary approach it considers NN (and the ensuing mitigation measures contained in Appendix C) as the preferred approach for all SAC catchments. *CCH4: Water Quality and Protection of Water Resources* will be the overarching policy within the rLDP which necessitates the implementation of mitigation to avoid adverse effects on site integrity. The requirement for development to not cause adverse effects on designated sites is further iterated within *SP14 Maintaining and Enhancing the Natural Environment*.
- 4.2.22 Whilst NN is presently necessitated within the Afon Teifi SAC catchment, an alternative 'decision-making threshold' approach (e.g., objective change compliance) for water quality could be devised for the other SAC catchments should there be sufficient scientific rigor in terms of ensuring no LSE. Nevertheless, CCC identifies that this would take significant resources with regards to monitoring to ensure compliance.
- 4.2.23 Additionally, a 'blended approach' could be developed between statutory bodies and the local authority to sustain Regulation 16A ²⁷ by embedding nature recovery and site improvement alongside the prevention of further deterioration to site integrity. These are both described within Appendix 2 and 3 (respectively) of the advice obtained from DTA Ecology.

²⁵ Appendix C; Paragraph 1.

²⁶ Chapter 3 in *River Twyi SAC – application of nutrient neutrality in a headroom catchment*. DTA Ecology. 2022.

²⁷ To manage the site network with a view to achieving the management objectives.

4.3 Applying the integrity test if suggested mitigation measures are incorporated

4.3.1 This following section should be ready in conjunction with Chapter 4.6 of Appendix C.

4.3.2 The strengthening of *CCH4: Water Quality and Protection of Water Resources* is relied upon to avoid adverse effects to site integrity of the riverine SACs on the basis that:

- The delivery of allocations identified in P sensitive SAC catchments will be pertinent upon the implementation of the mitigation measures outlined to achieve NN;
- The scope of the NMBs ensures that the outlined mitigation measures will be reactive to emerging data relevant to the compliance of the SAC catchments (e.g., any subsequent guidance from NRW, SAGIS data for Afon Tywi).;
- Once agreed, the terms of reference for the NMBs will need to include collaboration between those LPAs which share SAC catchments to ensure that the effects attributed to development arisen from rLDP policy is properly accounted for within the delivery of the proposed mitigation measures outlined in Appendix C.;
- Secure mechanisms for funding which will ensure the delivery, viability, and long-term maintenance and monitoring requirement of the proposed mitigation in perpetuity (e.g., developer contributions through planning obligations, and/or credit trading system – of which, a feasibility study has been commissioned);
- The development of a dedicated SPG will demonstrate how development proposals can ensure that there will be no increase in P levels within the respective P sensitive SAC catchment;
- Whilst it is not possible to foresee whether developers will wait for the delivery of 'strategic' mitigation, the proposal of 'developer-led' mitigation must be in accordance with the Regulations. This has been supported through the development of a P calculator²⁸ and guidance on P mitigation options²⁹;
- The phasing of development with mitigation functionality (e.g., wetland efficiency) and/or the implementation of bridging solutions must be based on robust scientific evidence to ensure the principle of NN is upheld.

4.3.3 Collectively, these factors are considered to be pertinent to the soundness of the rLDP regarding its' adherence to the Regulations. Specific reference is made to the high court judgement made in Feeney³⁰. The reliance on the mitigating provisions (set out above and in Chapter 4.5 in Appendix C³¹) as a conditional approval for the development provided by the rLDP is a legitimate course of action.

²⁸ [CCC Nutrient Budget Calculator](#)

²⁹ [Phosphorus Mitigation Review \(gov.wales\)](#)

³⁰ Noted in C.9.4.2 (HRA Handbook) and Section 4.1.2 (Appendix C). *"There is nothing wrong in approving something in principle which may not happen in the future, if the condition is not satisfied"*

³¹ Specifically, the eleven steps on page 36.

5. Overall Conclusions

- 5.1 The 2nd Deposit rLDP has been subject to screening under the Habitats Regulations. The conclusion of this screening exercise is that, except the potential effect mechanisms identified below, the amendments made since the HRA Report will have no likely significant effect, either alone or in combination, on any European sites.
- 5.2 An additional Appropriate Assessment was required in respect of:
- **Increased P loading within the Afon Tywi, Afon Teifi, Afonydd Cleddau, Afon Gwy (Wye) P sensitive catchments, with potential effects placed upon respective SACs.**
 - **Policy SP18: Mineral Resources due to the extant minerals permissions beneath the Cernydd Carmel SAC and the potential effects on the conservation objectives of Cernydd Carmel SAC.**
- 5.3 Mitigation measures were considered as part of the Appropriate Assessment. While dependent on the delivery and long-term implementation of the recommendations and mitigation contained within the present Addendum, it can be concluded that the 2nd Deposit rLDP will have no adverse effect on the integrity of any European sites.
- 5.4 NB: The above conclusion is consistent with that made in Chapter 5 of the HRA Report (as amended by Ref 41, Appendix A).

6. Consultation and Next Steps

- 6.1 The present HRA Addendum will be available for public consultation alongside the 2nd Deposit rLDP and HRA Report for an 8-week period commencing on the 17th of February 2023. Copies of these documents are available from the Forward Planning Section of CCC, or they can be viewed on [online](#). The rLDP and associated documents can also be inspected at Customer Service Centres and public libraries during advertised opening hours.
- 6.2 Please note that this HRA Addendum is for the 2nd Deposit rLDP and accompanies the previous HRA Report originally published in January 2020. Whilst previous representations relating to the HRA Report have been considered, they will not be formally submitted to the Inspector for examination. Furthermore, any representations submitted in relation to the 1st Deposit rLDP will not be considered or rolled over as part of this consultation. Therefore, previous representations should be resubmitted if you wish for them to be considered as part of this consultation.
- 6.3 Your views on this HRA Addendum can be made online via the [Council's Consultation Page](#). Alternatively, response forms can be downloaded from the website or are available upon request.

If you wish to send your views in writing, please post to:

Forward Planning Section
Place and Infrastructure Department
3 Spilman Street
Carmarthen
Carmarthenshire
SA31 1LE

Or via email: forward.planning@carmarthenshire.gov.uk

Please include 'HRA' within the subject line.

- 6.4 Representations must be received by the relevant date and time stated upon CCC's Consultation Page. Comments submitted after this date will not be considered.
- 6.5 To ensure that the requirements of the Habitats Directive and corresponding Regulations are met, it will be necessary to consider all further changes to the rLDP following the formal consultation and examination process (including Matters Arising Changes recommended within the Inspector's Final Report). Therefore, additional HRA documentation for the adopted version will be published at this time.

7. Appendices

Appendix A: Alterations to HRA Report

Alterations to the HRA Report since its initial publication in December 2020 are presented below, with updated text in Red. These have either been made in response to the consultations received or are *errata*. Please note that the additional issues raised within the HRA Addendum are not presented below. Those with HRA implication are highlighted in Grey and have subsequently been addressed.

Ref	Subject	Description	Reason	Implication
Changes applicable to the HRA Report (main body)				
1	1.1.1	<p>Insert “(as amended)” into:</p> <p>This report is a Habitats Regulations Assessment (HRA) of the rLDP, as required under The Conservation of Habitats and Species Regulations 2017 (as amended).</p>	Contextual update.	None.
2	1.3.1	<p>Insert “(as amended)” into:</p> <p>Chapter 8 of the Conservation of Habitats and Species Regulations 2017 (as amended) (“the Habitats Regulations”)</p>	Contextual update.	None.
3	Following 1.3.3	<p>Insert new paragraphs:</p> <p>1.3.4 In April 2018, the Court of Justice of the European Union delivered its judgment in Case C-323/17 <i>People Over Wind & Peter Sweetman v Coillte Teoranta</i> (‘People over Wind’). The judgment clarified that when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot consider any mitigation measures. As a result, the competent authority may only take account of mitigation measures intended to avoid or reduce the harmful effects of a plan or project as part of an appropriate assessment itself.</p> <p>1.3.5 In carrying out this assessment, any measures that are intended to avoid or reduce the harmful effects of a plan or project on a European site (generally referred to as mitigation measures) are not taken into consideration at the screening stage. However, ‘features or characteristics’ of the plan will be taken account of in the screening stage because they are essential in defining the nature, scale, location, timing, frequency or duration of the plan’s proposals, or they may be inseparable aspects of the plan, without which an assessment of the plan could not be properly made, even though these features or characteristics may incidentally have the effect of avoiding, reducing some or all of the potentially adverse effects of the plan .</p>	Alteration made in response to consultee.	Contextual update, no implication.

Ref	Subject	Description	Reason	Implication						
4	Following 2.1.1	<p>Insertion of new paragraph numbers and correction:</p> <p>2.1.2 A screening assessment, both alone and in combination, with other identified plans and projects will identify if any significant environmental effects will result affecting the site and conclude whether significant effects are likely or not.</p> <p>2.1.3 If no potential significant effects are identified, the process ends at this stage.</p> <p>2.1.4 If there are found...</p>	Formatting.	None.						
5	Under 2.2	<p>Insertion of new paragraph numbers:</p> <p>2.2.1 The purpose</p>	Formatting.	None.						
6	2.3.1	<p>Removal of text:</p> <p>2.3.1 In order to decide whether a development plan at any stage requires an appropriate assessment, it is necessary to apply the two tests set out in regulation 6385B(1) of the regulations,...</p>	Alteration made in response to consultee.	None.						
7	2.3.5	<p>Correction:</p> <p>2.3.5 If the likelihood of significant effects cannot...</p>	Spelling.	None.						
8	2.4.1	<p>Correction and insertion:</p> <ul style="list-style-type: none"> Conservation of Habitats and Species (Amendment) Regulations 20172 (the 'Conservation Regulations'). <p>Guidance:</p> <ul style="list-style-type: none"> Technical Advice Note (TAN) 5 – Nature Conservation and Planning. Planning Policy Wales, Welsh Assembly Government (2009). 	Alteration made in response to consultee.	Contextual update, no implication.						
9	3.1.1	<p>Correction:</p> <p>...groundwater flow direction will all have a baring bearing on the relevant distance...</p>	Spelling.	None.						
10	3.1.4	<p>Insertion in Table 2:</p> <table border="1" data-bbox="376 1316 1585 1377"> <thead> <tr> <th>European Site within 15km buffer around Plan Boundary</th> <th>Designation</th> <th>Distance from Plan boundary (km)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	European Site within 15km buffer around Plan Boundary	Designation	Distance from Plan boundary (km)				These Sites were listed in Figure 2 of the HRA Report (although were	Yes. These sites must be subsequently
European Site within 15km buffer around Plan Boundary	Designation	Distance from Plan boundary (km)								

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		<table border="1"> <tr> <td>Cardigan Bay</td> <td>SAC</td> <td>9.2km</td> </tr> <tr> <td>Elenydd</td> <td>SAC</td> <td>13.1km</td> </tr> <tr> <td>Coedydd Nedd a Mellte</td> <td>SAC</td> <td>11.9km</td> </tr> <tr> <td>Crymlyn Bog/ Cors Crymlyn</td> <td>SAC</td> <td>13.0km</td> </tr> <tr> <td>North Pembrokeshire Woodlands</td> <td>SAC</td> <td>9.0km</td> </tr> </table>	Cardigan Bay	SAC	9.2km	Elenydd	SAC	13.1km	Coedydd Nedd a Mellte	SAC	11.9km	Crymlyn Bog/ Cors Crymlyn	SAC	13.0km	North Pembrokeshire Woodlands	SAC	9.0km	initially absent in Table 2).	screened as appropriate.
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11	Table 3	<p>Corrections made to the follow sections of the Table:</p> <table border="1"> <thead> <tr> <th>Types of plan</th> <th>Site selection criteria</th> <th>Sites selected for further consideration</th> </tr> </thead> <tbody> <tr> <td>2. Plans that could affect the aquatic environment</td> <td>Sites upstream or downstream of the plan area in the case of river or estuary sites. Effects considered include localised effects on surface/groundwater resources and quality, resulting from changes in run-off, sedimentation, erosion etc as well as effects downstream.</td> <td> <table border="1"> <thead> <tr> <th>SACs</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> ▪ Afon Tywi ▪ Carmarthen Bay and Estuaries ▪ Carmarthen Bay Dunes ▪ Cernydd Carmel ▪ River Usk ▪ River Wye ▪ Cardigan Bay ▪ West Wales Marine ▪ Bristol Channel Approaches ▪ Pembrokeshire Marine </td> </tr> <tr> <th>SPA/Ramsar</th> </tr> <tr> <td> <ul style="list-style-type: none"> ▪ Carmarthen Bay ▪ Burry Inlet </td> </tr> </tbody> </table> </td> </tr> <tr> <td>7. Plans that would increase the amount of development</td> <td>Sites in the plan area or beyond that are used for, or could be affected by, water abstraction irrespective of distance from the plan area</td> <td> <table border="1"> <thead> <tr> <th>SACs</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> ▪ River Teifi ▪ River Tywi ▪ Cleddau Rivers ▪ Caeau Mynydd Mawr ▪ Cardigan Bay ▪ Carmarthen Bay and Estuaries ▪ Carmarthen Bay Dunes ▪ Cernydd Carmel ▪ Cwm Doethie – Mynydd Mallaen ▪ Crymlyn Bog – Cors Crymlyn ▪ Mynydd Epynt ▪ Preseli ▪ River Wye ▪ River Usk ▪ Yerboston Tops </td> </tr> </tbody> </table> </td> </tr> </tbody> </table>	Types of plan	Site selection criteria	Sites selected for further consideration	2. Plans that could affect the aquatic environment	Sites upstream or downstream of the plan area in the case of river or estuary sites. Effects considered include localised effects on surface/groundwater resources and quality, resulting from changes in run-off, sedimentation, erosion etc as well as effects downstream.	<table border="1"> <thead> <tr> <th>SACs</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> ▪ Afon Tywi ▪ Carmarthen Bay and Estuaries ▪ Carmarthen Bay Dunes ▪ Cernydd Carmel ▪ River Usk ▪ River Wye ▪ Cardigan Bay ▪ West Wales Marine ▪ Bristol Channel Approaches ▪ Pembrokeshire Marine </td> </tr> <tr> <th>SPA/Ramsar</th> </tr> <tr> <td> <ul style="list-style-type: none"> ▪ Carmarthen Bay ▪ Burry Inlet </td> </tr> </tbody> </table>	SACs	<ul style="list-style-type: none"> ▪ Afon Tywi ▪ Carmarthen Bay and Estuaries ▪ Carmarthen Bay Dunes ▪ Cernydd Carmel ▪ River Usk ▪ River Wye ▪ Cardigan Bay ▪ West Wales Marine ▪ Bristol Channel Approaches ▪ Pembrokeshire Marine 	SPA/Ramsar	<ul style="list-style-type: none"> ▪ Carmarthen Bay ▪ Burry Inlet 	7. Plans that would increase the amount of development	Sites in the plan area or beyond that are used for, or could be affected by, water abstraction irrespective of distance from the plan area	<table border="1"> <thead> <tr> <th>SACs</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> ▪ River Teifi ▪ River Tywi ▪ Cleddau Rivers ▪ Caeau Mynydd Mawr ▪ Cardigan Bay ▪ Carmarthen Bay and Estuaries ▪ Carmarthen Bay Dunes ▪ Cernydd Carmel ▪ Cwm Doethie – Mynydd Mallaen ▪ Crymlyn Bog – Cors Crymlyn ▪ Mynydd Epynt ▪ Preseli ▪ River Wye ▪ River Usk ▪ Yerboston Tops </td> </tr> </tbody> </table>	SACs	<ul style="list-style-type: none"> ▪ River Teifi ▪ River Tywi ▪ Cleddau Rivers ▪ Caeau Mynydd Mawr ▪ Cardigan Bay ▪ Carmarthen Bay and Estuaries ▪ Carmarthen Bay Dunes ▪ Cernydd Carmel ▪ Cwm Doethie – Mynydd Mallaen ▪ Crymlyn Bog – Cors Crymlyn ▪ Mynydd Epynt ▪ Preseli ▪ River Wye ▪ River Usk ▪ Yerboston Tops 	Alteration made in response to consultee (Carmarthen Bay Dunes & Cernydd Carmel). Additional amendments were made to reflect the preceding alteration (insertion of the impacts identified within the respective Standard Data Forms for Elenydd, Coedydd Nedd a Mellte, Cors Crymlyn)	Yes. Further screening required for the additional sites identified.
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Ref	Subject	Description		Reason	Implication	
			<p>Sites that could be affected by increased deposition of air pollutants arising from the plan, including emissions from significant increases in traffic</p>	<ul style="list-style-type: none"> ▪ Pembrokeshire Bat Sites and Bosherton Lakes ▪ Pembrokeshire Marine ▪ Gower Commons <p>SPA/Ramsar</p> <ul style="list-style-type: none"> ▪ Burry Inlet ▪ Carmarthen Bay <p>SACs</p> <ul style="list-style-type: none"> • River Teifi • Caeau Mynydd Mawr • Carmarthen Bay and Estuaries • Carmarthen Bay Dunes • Cernydd Carmel • Cleddau Rivers • Coedydd Nedd a Melle • Crymlyn Bog – Cors Crymlyn • Cwm Doethie – Mynydd Mallaen • Elenydd • Gower Ash Woods • Gower Commons • Gweunydd Blaencleddau • Mynydd Epynt • Pembrokeshire Bat Sites and Bosherton Lakes • Pembrokeshire Marine • Preseli • Rhos Llawr-cwrt • North Pembrokeshire Woodlands • Yerboston Tops 		
12	Under 3.1.11	<p>Insertion of new paragraph:</p> <p>3.1.12 Carmarthen Bay and Estuaries European Marine Site (CBEEMS) is comprised of Carmarthen Bay and Estuaries SAC, Carmarthen Bay SPA and the Burry Inlet SPA and Ramsar and will be used in this document to describe all aforementioned sites collectively unless otherwise stated.</p>		Alteration made in response to consultee.	None.	

Ref	Subject	Description	Reason	Implication
13	3.2.4	Correction: 3.2.4 Development and changes in land use can have affect the...	Formatting.	None.
14	3.2.7	Correction: ...where each proposed allocation is individually screened in paragraphs 3.2.107–3.2.111 and Table 17. Section 3.2.2.	Alteration made in response to consultee.	None.
15	Table 4	Correction: Identify allocations with a pathway to a watercourse in close proximity to a water course that flows in/out of sites	Alteration made in response to consultee.	None.
16	3.2.9	Correction: ...however, they will be considered on precautionary basis in paragraphs 3.2.107–3.2.111 and Table 17. Section 3.2.2.	Alteration made in response to consultee.	None.
17	3.2.11	Correction: ...however, they will be considered on precautionary basis in paragraphs 3.2.107–3.2.111 and Table 17. Section 3.2.2.	Alteration made in response to consultee.	None.
18	3.2.17	Correction: ... of physical barriers to migration will be considered in paragraphs 3.2.107–3.2.111 and Table 17. Section 3.2.2.	Alteration made in response to consultee.	None.
19	3.2.21	Correction: ...habitat fragmentation are screened in for further consideration in paragraphs 3.2.107–3.2.111 and Table 17. Section 3.2.2.	Alteration made in response to consultee.	None.
20	3.2.26	Correction: ...be considered in more detail in paragraphs 3.2.107-3.2.111 and Table 17 Section 3.2.2, where each...	Alteration made in response to consultee.	None.
21	3.2.34	Correction: This will be considered in paragraphs 3.2.107-3.2.111 and Table 17 Section 3.2.2, where each...	Alteration made in response to consultee.	None.

Ref	Subject	Description	Reason	Implication												
22	3.2.36	Correction: ...as such this will be considered further in paragraphs 3.2.107-3.2.111 and Table 17 Section 3.2.2, where...	Alteration made in response to consultee.	None.												
23	3.2.42	Correction: 3.2.42 In light of this, this will be considered further in paragraphs 3.2.107-3.2.111 and Table 17, where each proposed allocation is individually screened, to identify any potential impacts on the use of suitable areas of land used for both breeding and resting outside of the SAC boundary by otters.	Alteration made in response to consultee.	None.												
24	3.2.54	Correction: ... this will be considered further in paragraphs 3.2.107-3.2.111 and Table 17 Section 3.2.2, where...	Alteration made in response to consultee.	None.												
25	3.2.66	Correction: NRW and the Environment Agency (EA) EA undertook	Formatting.	None.												
26	3.2.69 Table 9	Inclusion of Crymlyn Bog – Cors Crymlyn: <table border="1" data-bbox="383 810 1644 1018"> <thead> <tr> <th>Sites identified as vulnerable</th> <th>Further screening required?</th> <th>Summary of generic level screening</th> </tr> </thead> <tbody> <tr> <td colspan="3">SAC</td> </tr> <tr> <td>Crymlyn Bog – Cors Crymlyn</td> <td>No</td> <td>Screened out of further consideration based on most recent HRA of DCWW Water Resources Management Plan.</td> </tr> </tbody> </table>	Sites identified as vulnerable	Further screening required?	Summary of generic level screening	SAC			Crymlyn Bog – Cors Crymlyn	No	Screened out of further consideration based on most recent HRA of DCWW Water Resources Management Plan.	Please refer to 10.	No further screening required regarding this site.			
Sites identified as vulnerable	Further screening required?	Summary of generic level screening														
SAC																
Crymlyn Bog – Cors Crymlyn	No	Screened out of further consideration based on most recent HRA of DCWW Water Resources Management Plan.														
27	Table 10 (page 29)	Correction: (Figure legend) ...the relevant European Sites sites which could...	Formatting.	None.												
28	Table 11	Correction: <table border="1" data-bbox="383 1200 1603 1385"> <thead> <tr> <th>Sites identified as vulnerable</th> <th>Further screening required?</th> <th>Summary of generic level screening</th> </tr> </thead> <tbody> <tr> <td colspan="3">SAC</td> </tr> <tr> <td>River Teifi</td> <td>Yes</td> <td></td> </tr> <tr> <td>River Tywi</td> <td>Yes</td> <td></td> </tr> </tbody> </table>	Sites identified as vulnerable	Further screening required?	Summary of generic level screening	SAC			River Teifi	Yes		River Tywi	Yes		Correction.	No subsequent impact.
Sites identified as vulnerable	Further screening required?	Summary of generic level screening														
SAC																
River Teifi	Yes															
River Tywi	Yes															

Ref	Subject	Description	Reason	Implication													
		<table border="1"> <tr> <td>Carmarthen Bay and Estuaries</td> <td>Yes</td> <td rowspan="2">Further information required from NRW regarding Rec. Screened at site level. assessment required through appropriate assessment.</td> </tr> <tr> <td>Carmarthen Bay Dunes</td> <td>Yes</td> </tr> </table>	Carmarthen Bay and Estuaries	Yes	Further information required from NRW regarding Rec. Screened at site level. assessment required through appropriate assessment.	Carmarthen Bay Dunes	Yes										
Carmarthen Bay and Estuaries	Yes	Further information required from NRW regarding Rec. Screened at site level. assessment required through appropriate assessment.															
Carmarthen Bay Dunes	Yes																
29	3.2.86	<p>Correction:</p> <p>... this will be considered in paragraphs 3.2.107-3.2.111 and Table 17 Section 3.2.2, where...</p>	Alteration made in response to consultee.	None.													
30	3.2.86 Table 12	<p>Inclusion of additional European sites:</p> <table border="1"> <thead> <tr> <th>Sites identified as vulnerable</th> <th>Further screening required?</th> <th>Summary of generic level screening</th> </tr> </thead> <tbody> <tr> <td>SAC</td> <td></td> <td></td> </tr> <tr> <td>Elenydd</td> <td>No</td> <td rowspan="3">Screened out of further consideration as sites are more than 200m outside Carmarthenshire boundary</td> </tr> <tr> <td>Coedydd Nedd a Mellte</td> <td>No</td> </tr> <tr> <td>Crymlyn Bog/ Cors Crymlyn</td> <td>No</td> </tr> </tbody> </table>	Sites identified as vulnerable	Further screening required?	Summary of generic level screening	SAC			Elenydd	No	Screened out of further consideration as sites are more than 200m outside Carmarthenshire boundary	Coedydd Nedd a Mellte	No	Crymlyn Bog/ Cors Crymlyn	No	Please refer to 10.	No further screening required regarding this site.
Sites identified as vulnerable	Further screening required?	Summary of generic level screening															
SAC																	
Elenydd	No	Screened out of further consideration as sites are more than 200m outside Carmarthenshire boundary															
Coedydd Nedd a Mellte	No																
Crymlyn Bog/ Cors Crymlyn	No																
31	3.2.88	<p>Correction:</p> <p>... this will be considered further in paragraphs 3.2.107-3.2.111 and Table 17 Section 3.2.2, where...</p>	Alteration made in response to consultee.	None.													
32	Table 14	<table border="1"> <thead> <tr> <th>Potential Effect Mechanism</th> <th>Summary of generic level screening</th> <th>Further screening requirements in detailed screening of specific allocations</th> </tr> </thead> <tbody> <tr> <td>Aquatic Environment</td> <td>Effects only likely where development is in close proximity to has a pathway to a water course that flows into/out of a site.</td> <td>To identify such allocations</td> </tr> </tbody> </table>	Potential Effect Mechanism	Summary of generic level screening	Further screening requirements in detailed screening of specific allocations	Aquatic Environment	Effects only likely where development is in close proximity to has a pathway to a water course that flows into/out of a site.	To identify such allocations	Alteration made in response to consultee.	Yes. Condition for screening allocation altered. Must reflect in all allocation screening.							
Potential Effect Mechanism	Summary of generic level screening	Further screening requirements in detailed screening of specific allocations															
Aquatic Environment	Effects only likely where development is in close proximity to has a pathway to a water course that flows into/out of a site.	To identify such allocations															
33	3.2.91 Table 15	<p>Correction:</p> <table border="1"> <thead> <tr> <th>European site</th> <th>Designation</th> <th>Scanned In</th> <th>Screened Out</th> </tr> </thead> <tbody> <tr> <td>Crymlyn Bog/ Cors Crymlyn</td> <td>SAC</td> <td>Abstraction</td> <td>Based on no LSE being identified in most recent HRA of DCWW Water Resources Management Plan.</td> </tr> </tbody> </table>	European site	Designation	Scanned In	Screened Out	Crymlyn Bog/ Cors Crymlyn	SAC	Abstraction	Based on no LSE being identified in most recent HRA of DCWW Water Resources Management Plan.	Please refer to 10.	No further screening required regarding this site.					
European site	Designation	Scanned In	Screened Out														
Crymlyn Bog/ Cors Crymlyn	SAC	Abstraction	Based on no LSE being identified in most recent HRA of DCWW Water Resources Management Plan.														

Ref	Subject	Description	Reason	Implication																					
		<table border="1"> <tr> <td></td> <td></td> <td>Air pollution</td> <td>More than 200m outside Carmarthenshire boundary</td> </tr> <tr> <td>Coedydd Nedd a Melte</td> <td>SAC</td> <td>Air pollution</td> <td>More than 200m outside Carmarthenshire boundary</td> </tr> <tr> <td>Elenydd</td> <td>SAC</td> <td>Air pollution</td> <td>More than 200m outside Carmarthenshire boundary</td> </tr> </table>			Air pollution	More than 200m outside Carmarthenshire boundary	Coedydd Nedd a Melte	SAC	Air pollution	More than 200m outside Carmarthenshire boundary	Elenydd	SAC	Air pollution	More than 200m outside Carmarthenshire boundary											
		Air pollution	More than 200m outside Carmarthenshire boundary																						
Coedydd Nedd a Melte	SAC	Air pollution	More than 200m outside Carmarthenshire boundary																						
Elenydd	SAC	Air pollution	More than 200m outside Carmarthenshire boundary																						
34	3.2.101	3.2.101 Screening of the Strategic Policies concluded that all but Policy SP18 they are unlikely	Alteration made in response to consultee.	Yes. Refer to Ref 35, 36, 39, 41, 42 for subsequent HRA implications (NB: SAR76 and SAR77 has not impacted this decision).																					
35	Following 3.2.102	Insertion: 3.2.103 Policy SP18 remains screened in due to the extant minerals permissions beneath Cernydd Carmel SAC. This policy will be considered further at the appropriate assessment stage.	See above.	See above.																					
36	Table 16	<table border="1"> <tr> <td>SP18 – Mineral Resources</td> <td>G-I</td> <td>Screened In Out</td> </tr> </table>	SP18 – Mineral Resources	G-I	Screened In Out	See above.	See above.																		
SP18 – Mineral Resources	G-I	Screened In Out																							
37	3.2.104	... policy directs growth to an area that is immediately adjacent to the both Carmarthen Bay and Estuaries European Marine Site and Carmarthen Bay Dunes SAC . There is no	Alteration made in response to consultee.	No implication.																					
38	Table 17	<table border="1"> <thead> <tr> <th>Site</th> <th>Allocation Reference</th> <th>Conclusion</th> </tr> </thead> <tbody> <tr> <td>Castell Pigyn Road, Abergwili</td> <td>PrC1/h12</td> <td>I K</td> </tr> <tr> <td>Pibwrlwyd</td> <td>PrC1/MU2</td> <td>I K</td> </tr> <tr> <td>Blossom Garage</td> <td>SeC14/h1</td> <td>I K</td> </tr> <tr> <td>Llandeilo Northern Quarter</td> <td>SeC16/h1</td> <td>I K</td> </tr> <tr> <td>Thomas Terrace</td> <td>SeC16/h2</td> <td>I K</td> </tr> <tr> <td>Land adjacent to Cefn Maes</td> <td>SeC18/h3</td> <td>I K</td> </tr> </tbody> </table>	Site	Allocation Reference	Conclusion	Castell Pigyn Road, Abergwili	PrC1/h12	I K	Pibwrlwyd	PrC1/MU2	I K	Blossom Garage	SeC14/h1	I K	Llandeilo Northern Quarter	SeC16/h1	I K	Thomas Terrace	SeC16/h2	I K	Land adjacent to Cefn Maes	SeC18/h3	I K	Alteration made in response to consultee. NB: The assessment of these allocations may be superseded within this current Addendum (i.e.,	Yes. Sites have been screened in as per consultee comments and supplied evidence. These are
Site	Allocation Reference	Conclusion																							
Castell Pigyn Road, Abergwili	PrC1/h12	I K																							
Pibwrlwyd	PrC1/MU2	I K																							
Blossom Garage	SeC14/h1	I K																							
Llandeilo Northern Quarter	SeC16/h1	I K																							
Thomas Terrace	SeC16/h2	I K																							
Land adjacent to Cefn Maes	SeC18/h3	I K																							

Ref	Subject	Description	Reason	Implication				
		<table border="1"> <tr> <td>Land at College Bach</td> <td>SuV60/h1</td> <td style="background-color: yellow;">IK</td> </tr> </table>	Land at College Bach	SuV60/h1	IK	SeC14/h1, SeC16/h1).	subsequently addressed.	
Land at College Bach	SuV60/h1	IK						
39	3.4.2	<p>Correction:</p> <p>The detail of the screening of rLDP policies is set out in Appendices 4 and 5. In summary, the screening assessment found that only one of the two policies have has the potential to have significant effects on European sites either alone or in combination. Chapter 4 will carry out an Appropriate Assessment of Policy SG3 Pembrey Peninsula, and look at in more detail the potential effects on the conservation objectives of the sites within the Carmarthen Bay and Estuaries European Marine Site as well as Carmarthen Bay Dunes SAC. Policy SP18 – Mineral Resources will also be subject to appropriate assessment due to the potential effects on the conservation objectives of Cernydd Carmel SAC.</p>	Please refer to 34.	Please refer to 34.				
40	3.4.3	<p>Correction:</p> <ul style="list-style-type: none"> Wastewater disposal from development connecting to Parc-y-Splotts, Cross Hands, Llannant, Laugharne, Pencader or Pendine WWTW with potential effects on the Carmarthen Bay and Estuaries European Marine Site, Afon Tywi SAC, Afon Teifi SAC or Carmarthen Bay Dunes SAC. Wastewater disposal from development in the absence of confirmation of the extent to which the growth provided for in the rLDP can be accommodated within the existing (post review) discharge consent limits, in particular potential effects upon the Carmarthen Bay and Estuaries European Marine Site. Surface water contamination as a result of identified allocations, with potential effects on River Tywi SAC, River Teifi SAC, Carmarthen Bay and Estuaries Marine Site, Carmarthren Bay Dunes and Cardigan Bay SAC. 	Contextual update.	Yes. Please refer to 42.				
41	4.1.1	<ul style="list-style-type: none"> Recreation, species disturbance, noise and light pollution effects as a result of Policy SG3 directing growth towards the Pembrey Peninsula with potential effects on both Carmarthen Bay and Estuaries European Marine Site and Carmarthen Bay Dunes SAC. The potential for habitat loss and fragmentation effects as a result of Policy SP18 which allows for the working of extant mineral rights with potential effects on Cernydd Carmel SAC. 	Alteration made in response to consultee.	Yes, overall conclusion for HRA Report edited.				
42	Table 18	<p>Correction:</p> <table border="1"> <thead> <tr> <th>Effect</th> <th>Options for mitigation</th> </tr> </thead> <tbody> <tr> <td>Species disturbance, noise and light pollution</td> <td>Any effects associated with development within the Pembrey Peninsula as a result of policy SG3 Pembrey Peninsula could be minimised if the potential sensitivities of the CBEEMS and Carmarthen Bay Dunes SAC were directly referenced within the supporting text of the policy.</td> </tr> </tbody> </table>	Effect	Options for mitigation	Species disturbance, noise and light pollution	Any effects associated with development within the Pembrey Peninsula as a result of policy SG3 Pembrey Peninsula could be minimised if the potential sensitivities of the CBEEMS and Carmarthen Bay Dunes SAC were directly referenced within the supporting text of the policy.	Because of the alteration made in response to consultee.	Yes, overall conclusion for the AA contained within the HRA Report
Effect	Options for mitigation							
Species disturbance, noise and light pollution	Any effects associated with development within the Pembrey Peninsula as a result of policy SG3 Pembrey Peninsula could be minimised if the potential sensitivities of the CBEEMS and Carmarthen Bay Dunes SAC were directly referenced within the supporting text of the policy.							

Ref	Subject	Description	Reason	Implication
		<p>effects on CBEEMS.</p> <p>Recreational effects and effects due to changes in abiotic conditions on Carmarthen Bay Dunes SAC</p> <p>Habitat loss and fragmentation effects on Cerydd Carmel SAC.</p> <p>Effects of wastewater disposal on the Carmarthen Bay and Estuaries European Marine Site, Afon Tywi SAC, Afon Teifi SAC and Carmarthen Bay Dunes SAC</p>		<p>has been altered.</p>
		<p>The following mitigation measures would be sufficient to provide the necessary confidence that the policy will not adversely affect the integrity of the CBEEMS and Carmarthen Bay Dunes SAC:</p> <ul style="list-style-type: none"> the inclusion of specific wording to acknowledge the sensitivity of CBEEMS to increased recreational pressure, disturbance, noise and light pollution within the policy itself and the supporting text to ensure that the risks to both CBEEMS and Carmarthen Bay Dunes SAC are fully recognised in the development of this area. Suggested text is provided below: <p><i>'Development in this location will need to demonstrate compliance with Policies SP13 Maintaining and Enhancing the Natural Environment and NE2 Biodiversity. A Habitats Regulations Assessment will be required to fully assess potential effects upon Carmarthen Bay and Estuaries European Marine Site and Carmarthen Bay Dunes SAC.'</i></p>		
		<p>The conservation objectives of the SAC status of Cerydd Carmel will supersede any development in order to safeguard extant mineral permissions, and to avoid potential habitat loss and fragmentation effects as a result of Policy SP18 which allows for the working of extant mineral rights.</p>		
		<p>DCWW has confirmed that the majority of growth proposed within the rLDP can be accommodated within the existing post-RoC permitted capacity. However, DCWW have identified six WWTW in which the growth proposed would likely result in an exceedance of the permitted capacity, meaning that a new or modified permit would likely be required to provide for the increase in demand. For this reason, the potential for likely significant effects could not be screened out. On a precautionary basis, this appropriate assessment will explore the options for mitigation in the event that capacity is not available for the allocations proposed.</p> <p>DCWW have identified Parc-y-Splotts, Cross Hands, Llannant, Laugharne, Pencader and Pendine WWTWs in which the growth proposed in the rLDP would likely result in an exceedance of the permitted capacity, meaning that a new or modified permit would likely be required to provide for the increase in demand. In the instances where capacity is not available, developers have the option of waiting for the necessary reinforcement works to be delivered through future AMP programmes or alternatively to fund the works themselves. Water network reinforcement works can be progressed via the requisition provisions of the</p>		

Ref	Subject	Description	Reason	Implication
		<p>WIA 1991. WwTW reinforcement works can be progressed via s106 of the Town & Country Planning Act (1990).</p> <p>It is not possible to foresee whether developers will wait for AMP funding to deliver the necessary reinforcement works, or fund the works themselves. If a developer did choose to fund the work themselves, it is also unclear as to whether the reinforcement works would trigger any variations or modification to the existing consent but, adopting a precautionary approach, it is reasonable to anticipate that the reinforcement works might be accompanied by such a modifications or variation.</p> <p>In this regard it is relevant to note that consent modifications and variations that are considered necessary to provide for further growth will be subject to a full Habitats Regulations Assessment by NRW, and that DCWW must be willing to implement mitigation measures required.</p> <p>In the unlikely event that NRW are unable to identify permitting options which can be relied upon to avoid adverse effects to National Site Networks (NSN), previously classified as Natura 2000/Ramsar sites, a Nutrient Management Plan approach to cover the catchment in question would provide the necessary reassurance that the development provided for could be delivered in a manner which would avoid adverse effects to the NSN.</p>		
43	4.2.17	...all border the aforementioned Natura 2000 sites (classified as NSN from 1st January 2021) which...	Contextual update.	None.
Changes made to Appendix 1				
44	Table within Appendix 1	<p>Correction:</p> <p>Under Afon Tywi, Annex II Species:</p> <ul style="list-style-type: none"> The conservation objective for the watercourse as defined here XX must be met <p>Site Name: Bosherton Lakes</p> <p>NB: Detailed site characterisation information for Elenydd, Coedydd Nedd a Mellte, and Cors Crymlyn can be found in the accompanying Core Management Plan and Natura 2000 standard data form for each site, which can be accessed via the Joint Nature Conservation Committee website.</p>	Alteration made in response to consultee.	None.
Changes made to Appendix 4				
45	Table within Appendix 4	Correction:	Please refer to 34.	Please refer to 34.

Ref	Subject	Description	Reason	Implication						
		<p>Under SP16:</p> <p>The specific location of the proposed allocation is considered in more detail in policies y-XX SG1, HOM1 and EME3, and are subject to separate screening.</p> <p>Under SP18:</p> <table border="1"> <tr> <td>I</td> <td>The distribution of mineral reserves in the County (which includes part of Cerydd Carmel SAC) are specifically protected through the national policy position that such resources should only be exploited in exceptional circumstances. However, on a precautionary basis, this policy will be screened in since there are extant mineral rights that sit within Cerydd Carmel SAC.</td> <td>Screened Out In</td> </tr> </table>	I	The distribution of mineral reserves in the County (which includes part of Cerydd Carmel SAC) are specifically protected through the national policy position that such resources should only be exploited in exceptional circumstances. However, on a precautionary basis, this policy will be screened in since there are extant mineral rights that sit within Cerydd Carmel SAC.	Screened Out In					
I	The distribution of mineral reserves in the County (which includes part of Cerydd Carmel SAC) are specifically protected through the national policy position that such resources should only be exploited in exceptional circumstances. However, on a precautionary basis, this policy will be screened in since there are extant mineral rights that sit within Cerydd Carmel SAC.	Screened Out In								
Changes made to Appendix 5										
46	INF4	This policy has been included in the plan with the intension of avoiding or-reducing effects on specific European site(s)...	Alteration made in response to consultee.	None.						
Changes made to Appendix 6										
47	Table within Appendix 6	<table border="1"> <thead> <tr> <th colspan="2"><u>Dwr Cymru Welsh Water – Water Resources Management Plan 2019</u></th> </tr> <tr> <th>Document Details</th> <th>Potential ‘in-combination’ effects</th> </tr> </thead> <tbody> <tr> <td>In line with DCWW’s 2050 strategy, this Plan describes the water resources risks that need to be overcome between 2020 and 2050, whether this be from the balance between the ability to supply water against the demand from customers, the need to invest in water resource infrastructure to maintain resilient water supplies or to meet the expectations of regulators and customers.</td> <td>The Water Resource Management plan does not set out policy although gives prioritised direction and guidance on what achievements are required during the plan period to take consideration of water demand and water supply in the context of future challenges including that of climate change. The conclusion of the HRA for the Water Resources Management Plan (2019) found that the plan would have no adverse effects alone, or in combination.</td> </tr> </tbody> </table>	<u>Dwr Cymru Welsh Water – Water Resources Management Plan 2019</u>		Document Details	Potential ‘in-combination’ effects	In line with DCWW’s 2050 strategy, this Plan describes the water resources risks that need to be overcome between 2020 and 2050, whether this be from the balance between the ability to supply water against the demand from customers, the need to invest in water resource infrastructure to maintain resilient water supplies or to meet the expectations of regulators and customers.	The Water Resource Management plan does not set out policy although gives prioritised direction and guidance on what achievements are required during the plan period to take consideration of water demand and water supply in the context of future challenges including that of climate change. The conclusion of the HRA for the Water Resources Management Plan (2019) found that the plan would have no adverse effects alone, or in combination.	Contextual updated.	None. Please find ensuing update in Appendix G.
<u>Dwr Cymru Welsh Water – Water Resources Management Plan 2019</u>										
Document Details	Potential ‘in-combination’ effects									
In line with DCWW’s 2050 strategy, this Plan describes the water resources risks that need to be overcome between 2020 and 2050, whether this be from the balance between the ability to supply water against the demand from customers, the need to invest in water resource infrastructure to maintain resilient water supplies or to meet the expectations of regulators and customers.	The Water Resource Management plan does not set out policy although gives prioritised direction and guidance on what achievements are required during the plan period to take consideration of water demand and water supply in the context of future challenges including that of climate change. The conclusion of the HRA for the Water Resources Management Plan (2019) found that the plan would have no adverse effects alone, or in combination.									
Changes made to Appendix 7										
48	Table within Appendix 7	Correction:	Summary of alteration made in response to consultee at the Initial HRA Screening Stage.	None.						

Ref	Subject	Description	Reason	Implication						
		<p>Table 1 Habitats Regulation Assessment: Key Stages</p> <ul style="list-style-type: none"> Under Purpose for Appropriate Assessment... Agreed. Wording amended to read: <u>To ensure that the plan will not adversely affect the integrity of sites. ... conservation objectives, whilst applying the precautionary principle. Where adverse impacts are identified or remain unknown, assess...</u> 3.1.1. Potential offsite... <u>...likely effects will be significant. This will include consideration of the potential for direct, indirect and cross-boundary effects.</u> 3.2.3. We would amend... <u>...identifies features of the N2K sites that ... between the plan proposals and the qualifying features of the sites. The Plan must not undermine the conservation objectives of the sites.</u> <p>Table 2 Scanning and site selection lists for sites that could potentially be affected by the plan</p> <ul style="list-style-type: none"> Section 16 – We do not agree... The following worded has been added to Section 16 as clarification: <u>Potential for mortality as a result of disturbance, however to avoid duplication this is addressed under Section 14.</u> 3.2.9. Effects associated with development... <u>...river or estuary sites. Effects considered include localised effects on surface/groundwater resources and quality, resulting from changes in run-off, sedimentation, erosion etc.</u> <p>Table 6 Preliminary screening of European Sites identified as vulnerable to effects on the coast.</p> <ul style="list-style-type: none"> 3.2.31- 3.2.36 European otters... <u>...of suitable areas of land used for both breeding and resting outside the SAC boundary by otters.</u> <p>Table 12 Summary of the preliminary screening based on overall growth projection of Preferred Strategy.</p> <ul style="list-style-type: none"> Aquatic environment – Hydrological... <u>...into/out of a site. Hydrological links must also be considered.</u> Development: Air pollution... <u>...sensitive sites. Consideration will also be given to any potential impacts from intensive agriculture and other industrial sources.</u> 								
Changes made to Appendix 8										
49	Appendix 8 - PrC1/h12	<table border="1"> <thead> <tr> <th>Potential Effect</th> <th>Commentary</th> <th>Screening Category</th> </tr> </thead> <tbody> <tr> <td>Site: PrC1/h12– Castell Pigyn Road, Abergwili</td> <td></td> <td></td> </tr> </tbody> </table>	Potential Effect	Commentary	Screening Category	Site: PrC1/h12– Castell Pigyn Road, Abergwili			Alteration made in response to consultee.	Allocation specific inclusion
Potential Effect	Commentary	Screening Category								
Site: PrC1/h12– Castell Pigyn Road, Abergwili										

Ref	Subject	Description			Reason	Implication
		General Observations	The proposed development site is approximately 1.0km from Afon Tywi SAC and is spatially linked to the site.			within screening. Does not alter any overall conclusions reached.
		Effects on aquatic environment	The site is adjacent to a water course and is spatially linked to Afon Tywi SAC. Potential effects including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In(I)		
		Effects on marine environment	The site is adjacent to a water course and is spatially linked to Afon Tywi SAC and CBEEMS. Potential effects including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In(I)		
		Effects on the coast	None	Screened out (G)		
		Effects on mobile species	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In(I)		
		Recreational effects	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened Out (H)		
		Effects of increased development: abstraction	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened out (G)		
		Effects of increased development: Waste water	None	Screened Out (J)		
		Effects of increased development: air pollution	Site or accompanying road infrastructure do not run within 200m of a European Site.	Screened Out (G)		
		Effects of increased development: disturbance, noise and light pollution	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In(I)		
		Overall screening category:	I: May have a significant effect on a site alone			
50	Appendix 8 - PrC1/MU2	Potential Effect	Commentary	Screening Category	See above.	See above.
		Site: PrC1/MU2– Pibwrlwyd				
		General Observations	The proposed development site is approximately 250m from Afon Tywi SAC and is spatially linked to the site.			

Ref	Subject	Description			Reason	Implication
		Effects on aquatic environment	The site is adjacent to a water course and is spatially linked to Afon Tywi SAC. Potential effects including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In(I)		
		Effects on marine environment	The site is adjacent to a water course and is spatially linked to Afon Tywi SAC and CBEEMS. Potential effects including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In(I)		
		Effects on the coast	None	Screened out (G)		
		Effects on mobile species	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In(I)		
		Recreational effects	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened Out (H)		
		Effects of increased development: abstraction	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened out (G)		
		Effects of increased development: Waste water	None	Screened Out (J)		
		Effects of increased development: air pollution	Site or accompanying road infrastructure do not run within 200m of a European Site.	Screened Out (G)		
		Effects of increased development: disturbance, noise and light pollution	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In(I)		
		Overall screening category:		I: May have a significant effect on a site alone		
51	Appendix 8 - SeC16/h2	Potential Effect	Commentary	Screening Category	See above.	See above.
Site: SeC16/h2– Thomas Terrace						
General Observations		The proposed development site is approximately 200m from Afon Tywi SAC but is not linked spatially to the site.				
Effects on aquatic environment	None. No link to water course.		Screened Out (G)			
Effects on marine environment	None		Screened Out (G)			

Ref	Subject	Description			Reason	Implication	
		Effects on the coast	None	Screened out (G)			
		Effects on mobile species	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In (I)			
		Recreational effects	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened Out (H)			
		Effects of increased development: abstraction	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened out (G)			
		Effects of increased development: Waste water	None	Screened Out (J)			
		Effects of increased development: air pollution	The site is within 200m of Afon Tywi, however the site is not identified as being sensitive to changes in Air Quality and it is considered that the level of development in this area is low enough that there will be no likely significant effects on air quality.	Screened Out (H)			
		Effects of increased development: disturbance, noise and light pollution	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In (I)			
		Overall screening category:	I: May have a significant effect on a site alone				
52	Appendix 8 - SeC18/h3	Potential Effect	Commentary	Screening Category	See above.	See above.	
		Site: SeC18/h3– Land adjacent to Cefn Maes					
		General Observations	The proposed development site is approximately 1.2km from CBEEMS however is hydrologically linked to the site.				
		Effects on aquatic environment	Site is adjacent to a water course. Potential for effects on CBEEMS including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In (I)			
		Effects on marine environment	Site is adjacent to a water course. Potential for effects on CBEEMS including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In (I)			
		Effects on the coast	None	Screened out (G)			

Ref	Subject	Description			Reason	Implication	
		Effects on mobile species	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In(I)			
		Recreational effects	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened Out (H)			
		Effects of increased development: abstraction	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened out (G)			
		Effects of increased development: Waste water	None	Screened Out (J)			
		Effects of increased development: air pollution	Site or accompanying road infrastructure do not run within 200m of a European Site.	Screened Out (G)			
		Effects of increased development: disturbance, noise and light pollution	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In(I)			
		Overall screening category:	I: May have a significant effect on a site alone				
53	Appendix 8 - SuV60/h1	Potential Effect	Commentary	Screening Category	See above.	See above.	
Site: SuV60/h1– Land at College Bach							
General Observations			The proposed development site is approximately 4.8km from CBEEMS but is spatially linked to the site.				
Effects on aquatic environment			Site is adjacent to a water course. Potential for effects on CBEEMS including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In (I)			
Effects on marine environment			Site is adjacent to a water course. Potential for effects on CBEEMS including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In (I)			
Effects on the coast			None	Screened out (G)			
Effects on mobile species			The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In(I)			
Recreational effects			Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA,	Screened Out (H)			

Ref	Subject	Description			Reason	Implication	
			where no additional material has emerged to the contrary.				
		Effects of increased development: abstraction	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened out (G)			
		Effects of increased development: Waste water	None	Screened Out (J)			
		Effects of increased development: air pollution	Site or accompanying road infrastructure do not run within 200m of a European Site.	Screened Out (G)			
		Effects of increased development: disturbance, noise and light pollution	The proximity of the site to a water course may present risks to other that may be in the area.	Screened In(I)			
		Overall screening category:	I: May have a significant effect on a site alone				

Appendix B: Schedule of Substantive rLDP Amendments

Substantive Amendments made to the 2nd Deposit rLDP since the 1st are presented below, with updated text highlighted in Red. For ease of clarity, please note that minor formatting, spelling, and non-substantive changes have been excluded. An extensive list of all changes will be made available during examination. Those amendments which are deemed to have possible HRA implications are highlighted in grey, otherwise for those changes where ‘no perceived implication for the HRA’ are noted, **the previous findings made in relation to subject matter within the HRA Report remain true.** Additional notes (NB:) are given if they impact the readability of the HRA Report. SAR = Substantive Amendment Reference. Changes to housing and employment allocations are contained within Chapter 11 (starting at SAR24–27 and SAR33–37 respectively).

SAR	Subject	Description	Reason	Implication																										
Changes applicable throughout the entirety Plan																														
SAR1	n/a	Reordering of the Strategic Policies (SP). SP16 became SP3, affecting the order of the subsequent SP until SP17.	Formatting change.	None – this has no perceived implication for the HRA. NB: This affects referencing within the HRA Report.																										
		<table border="1"> <thead> <tr> <th>Previous SP Order</th> <th>Current SP Order</th> </tr> </thead> <tbody> <tr> <td>SP1: Strategic Growth</td> <td>SP1: Strategic Growth</td> </tr> <tr> <td>SP2: Retail and Town Centres</td> <td>SP2: Retail and Town Centres</td> </tr> <tr> <td>SP3: A Sustainable Approach to Providing New Homes</td> <td>SP3: Sustainable Distribution – Settlement Framework</td> </tr> <tr> <td>SP4: Affordable Homes Strategy</td> <td>SP4: A Sustainable Approach to Providing New Homes</td> </tr> <tr> <td>SP5: Strategic Sites</td> <td>SP5: Affordable Homes Strategy</td> </tr> <tr> <td>SP6: Employment and the Economy</td> <td>SP6: Strategic Sites</td> </tr> <tr> <td>SP7: Welsh Language and Culture</td> <td>SP7: Employment and the Economy</td> </tr> <tr> <td>SP8: Infrastructure</td> <td>SP8: Welsh Language and Culture</td> </tr> <tr> <td>SP9: Gypsy and Traveller Provision</td> <td>SP9: Infrastructure</td> </tr> <tr> <td>SP10: The Visitor Economy</td> <td>SP10: Gypsy and Traveller Provision</td> </tr> <tr> <td>SP11: Placemaking and Sustainable Places</td> <td>SP11: The Visitor Economy</td> </tr> <tr> <td>SP12: Rural Development</td> <td>SP12: Placemaking and Sustainable Places</td> </tr> </tbody> </table>	Previous SP Order	Current SP Order	SP1: Strategic Growth	SP1: Strategic Growth	SP2: Retail and Town Centres	SP2: Retail and Town Centres	SP3: A Sustainable Approach to Providing New Homes	SP3: Sustainable Distribution – Settlement Framework	SP4: Affordable Homes Strategy	SP4: A Sustainable Approach to Providing New Homes	SP5: Strategic Sites	SP5: Affordable Homes Strategy	SP6: Employment and the Economy	SP6: Strategic Sites	SP7: Welsh Language and Culture	SP7: Employment and the Economy	SP8: Infrastructure	SP8: Welsh Language and Culture	SP9: Gypsy and Traveller Provision	SP9: Infrastructure	SP10: The Visitor Economy	SP10: Gypsy and Traveller Provision	SP11: Placemaking and Sustainable Places	SP11: The Visitor Economy	SP12: Rural Development	SP12: Placemaking and Sustainable Places		
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Chapter 3 – Influences on the Plan																		
SAR2	3.6	<p>The Following Text was added:</p> <p>The Statement was produced in 2020 against a backdrop of the Welsh Government’s declaration of a Climate and a Nature Emergencies. These two issues are interrelated and are in themselves symptoms of the unsustainable management of natural resources. They require a whole systems approach, and as such both issues feature across all the SWWAS themes of:</p> <ul style="list-style-type: none"> • Reducing health inequalities • Ensuring sustainable land management • Reversing the decline of, and enhancing, biodiversity • Cross-cutting theme: Mitigating and adapting to a changing climate 	Addition of the incorporation of NRW’s Area Statement.	None – this has no perceived implications for the HRA.														
Chapter 4 – Carmarthenshire – Strategic Context																		
SAR3	Minor changes throughout section although principal changes to	Supporting information in relation the strategic context of the County has been amended/updated. This includes an overview; Well-being and Sustainable Development; Strategic Planning Context; Social and Cultural (demographical); Economic; Environmental; Connections.	Reflecting updated evidence and baseline data.	None – this has no perceived implications for the HRA.														

SAR	Subject	Description	Reason	Implication
	4.3; 4.4; 4.21; 4.24; 4.32; 4.36; 4.37; 4.38; 4.39; 4.40; 4.52.			
Chapter 5 – Issues Identification				
SAR4	Minor changes throughout section although principal changes to 5.3; 19.; 5.7.	<p>Updated Contextual Issues since the publication of the 1st Deposit rLDP.</p> <p>5.5 We understand where we are now as a County and where we all want to get to. This has allowed for the development of a consensus on those issues that a spatial / land use plan can seek to address up to 2033. This has however, been supplemented by a series of high-level issues which have emerged as a result of contextual changes which have arisen since the publication of the 1st Deposit version of the Plan.</p> <p>5.7 The following contextual issues have emerged subsequent to the publication of the 1st Deposit Plan and include matters which whilst beyond the Plan's control have impacted on its preparation and content. These will be considered through the content of this Plan and its supporting documents and evidence:</p> <p>UCI 1 Response to the publication of the NRW Guidance on Phosphate Levels in protected Riverine SACs. UCI 2 Recognise and reflect the impacts arising from Covid-19. UCI 3 Declaration by the Council of a Climate Emergency. UCI 4 Declaration by the Council of a Nature Emergency. UCI 5 Ten Towns Initiative.</p>	Reflecting updated evidence and baseline environmental context within the County.	<p>None – this has no perceived implications for the HRA.</p> <p>NB: While these changes within the Plan itself have no impact upon the HRA, the HRA must reflect the issue of development occurring within phosphate sensitive SACs catchments.</p>
Chapter 7 – Strategic Objectives				
SAR5	n/a	Inclusion of Updated Contextual Issues (UCI) within the Plan's strategic objectives. UCI 1 – 5.	Addressing contextual issues within the Plan's objectives.	None – this has no perceived implications.

SAR	Subject	Description	Reason	Implication																				
				implications for the HRA. Although may need re-screening given changes in scope.																				
Chapter 8 - Strategic Growth and Spatial Options																								
SAR6	n/a	Inclusion of updated review papers on demographic and household projections. Spatial option remains the same. The Preferred Growth Option for the 1st Deposit was the PG 10yr (2019 Addendum Report), whereas the Preferred Growth Option for the 2nd Deposit was the Ten-year trend-based projection – which are reflected below. <table border="1" data-bbox="376 742 1249 965"> <thead> <tr> <th>Measure</th> <th>1st Deposit</th> <th>2nd Deposit</th> <th>+/-</th> </tr> </thead> <tbody> <tr> <td>Population Increase</td> <td>15,115</td> <td>14,468</td> <td>-647</td> </tr> <tr> <td>Household Increase</td> <td>n/a</td> <td>588</td> <td>n/a</td> </tr> <tr> <td>New Homes</td> <td>8,835</td> <td>8,822</td> <td>-13</td> </tr> <tr> <td>Jobs Creation</td> <td>354</td> <td>276</td> <td>-78</td> </tr> </tbody> </table>	Measure	1 st Deposit	2 nd Deposit	+/-	Population Increase	15,115	14,468	-647	Household Increase	n/a	588	n/a	New Homes	8,835	8,822	-13	Jobs Creation	354	276	-78	In response to updated projections which reflect more recent events.	Yes – while the previous HRA Report considered slightly larger projections although the same spatial distribution method, implications of allocation alterations as a result of these projections will need to be considered against site-specific policies, in addition to their location, size and impact upon
Measure	1 st Deposit	2 nd Deposit	+/-																					
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SAR	Subject	Description	Reason	Implication
				nearby European sites. Therefore, new allocations will need screening.
Chapter 9 – A New Strategy				
SAR7	n/a	<p>9.17 The Plan therefore seeks to provide a level of growth required to retain and enhance the services and facilities provided in the County's rural settlements and to provide a suitable level and choice of housing options for the local population in the face of local challenges such as a challenging housing market and the prevalence of second homes and holiday homes.</p> <p>9.22 'Moving Rural Carmarthenshire Forward' represents a significant milestone for the Authority, setting out a strategy for the regeneration of our rural communities. A direct outcome of its recommendations is the 'Ten Towns' initiative which supports the economic recovery and growth of rural towns across the County, including the development of Economic growth plans to drive forward an agenda for change for each of the respective towns and their wider hinterland: Cross Hands, Cwmaman, Kidwelly, Laugharne, Llandeilo, Llandovery, Llanybydder, Newcastle Emlyn, St. Clears and Whitland.</p> <p>Update to Regeneration and the Economy; Sustainable Development, Well-being and Climate Change; Placemaking, Infrastructure and Cohesive Communities. Addition of the following:</p> <p>9.52 In January 2021, Natural Resources Wales issued 'interim planning advice' to avoid further deterioration in environmental capacity. This 'advice' relates to all Riverine Special Area of Conservation (SACs) whose catchments extend into Carmarthenshire including, the Afon Teifi, Afon Tywi, River Wye and Afon Cleddau. It is currently on the third iteration of the guidance.</p> <p>9.53 As a Local Planning Authority, the Council is required to have regard to the advice given by NRW when making planning decisions (for both individual planning applications and for this LDP). The Council is taking as proactive an approach as possible to this issue and has put in place a series of tools including a nutrient calculator and mitigation guidance.</p> <p>9.54 The calculator enables developers/applicants etc to work out the level of phosphate generated by a development and therefore devise appropriate mitigation schemes. This is in turn supported by detailed</p>	Addressing contextual issues within the Plan's strategy.	<p>None – this has no perceived implications for the HRA.</p> <p>NB: While these changes within the Plan itself have no impact upon the HRA, the HRA must reflect the issue of development occurring within phosphate sensitive SACs catchments.</p>

SAR	Subject	Description	Reason	Implication		
		<p>mitigation guidance to support them identifying potential approaches. We were also the first to establish and hold a Nutrient Management Board (NMB) in Wales (for the Afon Tywi) and are members of the also recently formed Afon Cleddau and Afon Teifi NMBs.</p> <p>9.55 The Plan will be supported by a range of approaches including Catchment Phosphorous Reduction Strategies will identify a range of mitigation measures, as well as wider measures that are outside of the remit of the Council and lie with other responsible bodies in relation to the wider riverine environment. These will be linked to a series of delivery milestones designed to ensure that the implementation of suitable mitigation happens in as manner that facilitates the release of development in the Plan.</p> <p>A New Strategy -- Key Components updated including with Phosphate pollution in protected Riverine SACs, and declarations of Climate and Nature and National and Local level.</p>				
Chapter 11 – (Strategic & Specific) Policies						
SAR8	References made throughout, specific to those identified.	<p>Formatting changes to policies:</p> <p>Merging of RTC1 and RTC2 (some elements of RTC1 added to SP2; subsequent reordering leading to the removed of RTC3)</p> <p>EME5: Home Working Home Based Businesses</p> <p>VE2: Permanent Holiday Accommodation Holiday Accommodation</p> <p>VE3: Touring Caravan, Camping and Glamping Sites Touring Caravan, Camping and Non-Permanent Alternative Camping Accommodation</p> <p>VE4: Static Caravan and Chalet Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation</p> <p>PSD1: Sustainable and High Quality Design Effective Design Solutions: Sustainability and Placemaking</p> <p>Split of CCH1 to become CCH1 and CCH2 dependent on LSAs (impacting numbering of all CCH# Specific Policies).</p> <table border="1" data-bbox="383 1297 1480 1361"> <tr> <td data-bbox="383 1297 936 1361">CCH1: Renewable Energy</td> <td data-bbox="936 1297 1480 1361">CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas</td> </tr> </table>	CCH1: Renewable Energy	CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas	Categorical Amendment	<p>Yes – this RTC1 and some CCH# will require (re)screening.</p> <p>NB: This will affect references made within the HRA Report.</p>
CCH1: Renewable Energy	CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas					

SAR	Subject	Description	Reason	Implication												
		<table border="1" data-bbox="378 248 1480 628"> <tr> <td data-bbox="378 248 931 312">CCH2: Electric Vehicle Charging Points</td> <td data-bbox="931 248 1480 312">CCH2: Renewable Energy Outside Pre-Assessed Areas and Local Search Areas</td> </tr> <tr> <td data-bbox="378 312 931 376">CCH3: Water Quality and Protection of Water Resources</td> <td data-bbox="931 312 1480 376">CCH3: Electric Vehicle Charging Points</td> </tr> <tr> <td data-bbox="378 376 931 440">CCH4: Flood Risk Management and Avoidance</td> <td data-bbox="931 376 1480 440">CCH4: Water Quality and Protection of Water Resources</td> </tr> <tr> <td data-bbox="378 440 931 504">CCH5: Renewable and Low Carbon Energy in New Developments</td> <td data-bbox="931 440 1480 504">CCH5: Flood Risk Management and Avoidance</td> </tr> <tr> <td data-bbox="378 504 931 568">CCH6: Climate Change – Forest and Woodland Planting</td> <td data-bbox="931 504 1480 568">CCH6: Renewable and Low Carbon Energy in New Developments</td> </tr> <tr> <td data-bbox="378 568 931 628"></td> <td data-bbox="931 568 1480 628">CCH7: Climate Change – Forest, Woodland and Tree Planting</td> </tr> </table> <p data-bbox="378 660 1014 692">Reordering of the Strategic Policies (Please see AR1)</p> <p data-bbox="378 724 813 756">Addition of INF5 (Please see below).</p>	CCH2: Electric Vehicle Charging Points	CCH2: Renewable Energy Outside Pre-Assessed Areas and Local Search Areas	CCH3: Water Quality and Protection of Water Resources	CCH3: Electric Vehicle Charging Points	CCH4: Flood Risk Management and Avoidance	CCH4: Water Quality and Protection of Water Resources	CCH5: Renewable and Low Carbon Energy in New Developments	CCH5: Flood Risk Management and Avoidance	CCH6: Climate Change – Forest and Woodland Planting	CCH6: Renewable and Low Carbon Energy in New Developments		CCH7: Climate Change – Forest, Woodland and Tree Planting		
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SAR9	INF5	<p data-bbox="378 767 1666 799">New policy to be inserted for rural allocations which fall outside the catchment of the public sewerage system.</p> <p data-bbox="378 831 1666 895">The new policy would seek to assure that the allocation in its entirety utilises one private system as proliferation of private plants can cause environmental problems.</p> <p data-bbox="378 927 1666 1046">New policy - Proposals for the delivery of sites of 5 or more Dwellings in settlements where there is no connection to the public sewer will be supported where they are served by a single private system. Such proposals will be permitted where it does not have a detrimental effect on the natural environment, surrounding uses or local amenity.</p> <p data-bbox="378 1078 1666 1166">And supporting text - There is concern that the proliferation of private sewers is having a detrimental impact on the environment. This policy aims to discourage a development from having individual private sewers and instead encourage utilisation of a shared private sewerage system.</p>	<p data-bbox="1693 767 1944 1355">Seeking a new policy for rural allocations which fall outside the catchment of the public sewerage system we would advise that your Authority consider the allocation in its entirety utilising one private system as proliferation of private plants can cause environmental problems. This is a topic area that needs to be accounted for in the written statement given the</p>	<p data-bbox="1968 767 2141 855">Yes – this will need screening</p>												

SAR	Subject	Description	Reason	Implication
			dynamics of the county.	
Chapter 11 (Continued) – SP1: Strategic Growth				
SAR10	SP1 Policy Text	Updated figures: The LDP will provide for the future growth of a sustainable economy and housing requirement through the provision of: a) 10,160 9,704 new homes to meet the identified housing requirement of 8,835 8,822 . b) A minimum of 77.93 71.21 ha of allocated employment land.	To reflect updated projections	See SAR6
SAR11	SG1	Allocate new mixed-use site (PrC2): Site description as follows: “YMCA Building, Stepney Street, Llanelli Town Centre A mix of uses at a town centre location, with an allowance for 8 residential units” Consequential inclusion in policy HOM1 – Housing Allocations and Appendix 7. Refer to FCM/PrC2/b in the Schedule of Focused Changes: Proposals Maps	To reflect planning application progress and the corporate emphasis / investment in Llanelli Town Centre. To reflect planning reference: PL/00673.	Yes – Amend site allocation in HRA and review, where necessary.
SAR12	SG1	Amend / reduce the allocated site area of PrC2/MU2 to exclude an area of woodland to the west of the site. Consequential deletion of site from policy HOM1 – Housing Allocations and Appendix 7. Amended site description to read as follows: “Trostre Gateway, Llanelli: Mix of uses reflecting its prominent location and planning history”. Refer to FCM/PrC2/c in the Schedule of Focused Changes: Proposals Maps	In response to a representation from a statutory consultee.	Yes – Amend site allocation in HRA and review, where necessary.
SAR13	SG1	Allocate new site into the SG1 – mixed use table Site Description as follows: Laugharne Holiday Park: Mix of uses focused on tourism and leisure proposals and associated with the re-development of Laugharne Holiday Park. Refer to FCM/SeC20/a in the Schedule of Focused Changes: Proposals Maps.	To reflect the re-development on the site and in response to a representation	Yes – Amend site allocation in HRA and review, where necessary

SAR	Subject	Description	Reason	Implication
SAR14	SG1	<p>Allocate new site into the SG1 – regeneration and mixed-use site table</p> <p>Site Description as follows:</p> <p>Nant y Caws Regeneration and Mixed-Use Site:</p> <p>A strategically positioned site already utilised for the sustainable management of waste. It offers the future opportunity to potentially harness energy from waste, and related employment-based activities. Future opportunities could be set out through the development of a masterplan for the site.</p> <p>Refer to FCM/WM/a in the Schedule of Focused Changes: Proposals Maps.</p>	Partly in response to a representation and to reflect the strategic importance of this site for continued sustainable waste management and related employment uses.	Yes – Amend site allocation in HRA and review, where necessary
SAR15	SG2	Removal of Nantycaws Waste Management Site from this Policy, subsequent coverage under Policy SG1: Regeneration and Mixed-Use Sites.	Partly in response to a representation and to reflect the strategic importance of this site for continued sustainable waste management and related employment uses.	Yes – Amend site allocation in HRA and review, where necessary
SAR16	Para 11.19	<p>Amend the last sentence of paragraph 11.18 as follows:</p> <p>“In the event that the allocated sites (identified under policies HOM1, EME1 and EMP5) fail to contribute as expected to the delivery of the Plan's strategy, then the decision to utilise a Reserve Site will be made as part of a formal plan review.”</p>	In response to a representation from a statutory consultee.	<p>None – this has no perceived implication for the HRA.</p> <p>NB: Reserve Site must be reviewed accordingly, when necessary.</p>
Chapter 11 (Continued) – SP2: Retail and Town Centres				

SAR	Subject	Description	Reason	Implication
SAR17	Policy SP2	<p>Replace criterion a) of Policy SP2 with the following:</p> <p>“Proposals for retail and other appropriate town centre uses, (including leisure, civic, cultural, education, business, health and residential (upper floors)) which support the growth of Carmarthen as a sub-regional retail town centre will be permitted where they maintain and enhance the vitality, viability and attractiveness of Carmarthen Town Centre. Proposals should not:</p> <ol style="list-style-type: none"> 1) undermine the retail function of the centre, or have a detrimental effect upon the vitality or viability of the area; and 2) create a concentration of non-retail ground floor frontage detrimental to the retail character and function of the area.” 	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.	None – this has no perceived implication for the HRA.
SAR18	Policy SP2 Para 11.29	<p>Amend paragraph 11.29 to include the following at the end of the paragraph:</p> <p>“The policy, however, also seeks to recognise the impact of Covid-19 and changing in shopping patterns has had on our high streets and within town centres. In this respect the policy seeks to reflect the intrinsic retail function whilst recognising a new multifunctional role for such centres.”</p>	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.	None – this has no perceived implication for the HRA.
SAR19	Policy SP2 Para 11.34	<p>Replace paragraph 11.34 with the following:</p> <p>“Carmarthen has a longstanding sub-regional role and has traditionally had a strong national presence on its high street as well as a variety of local stores. The nature of its retail offer has however been notably impacted by Covid-19 with a number of the national operators having withdrawn in light of the financial challenges and realignment within the retail sector. Consequently, whilst the centre does and will continue to serve a range of needs for the population beyond its local community the nature of its offer and the range of uses within the traditional retail core must be adaptive whilst retaining that traditional retail base. The centre continues to be readily characterised as a higher order retail centre by the provisions above.”</p>	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.	None – this has no perceived implication for the HRA.
SAR20	Policy SP2 Para 11.35	<p>Amend paragraph 11.35 to include the following at the end of the paragraph:</p> <p>“Further LDO’s are being prepared for Carmarthen and Ammanford Town Centres as part of regeneration initiatives to aid in the Covid-19 recovery. The future role of these and the Llanelli Town Centre LDO will be further considered as tools to assist in the implementation of this Revised LDP.”</p>	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication				
SAR21	Policy SP2 Para 11.37	Insert the following sentence at the end of paragraph 11.37 under policy SP2: "Regard will be had to the implications proposals for new convenience stores outside of the identified High, Mid and Lower Order centres (defined within the Policy) will have on defined retail centres within neighbouring authorities. Proposals which may have an adverse impact should be accompanied by a robust retail assessment."	In response to a representation and to ensure the Plan makes appropriate provision for cross border implications.	None – this has no perceived implication for the HRA.				
SAR22	Policy SP2 New Para Supporting text	Insert the following new paragraphs into the supporting text of Policy SP2: "This Revised LDP seeks to strike a balance between protecting the overall retail character of the town centres and providing for an appropriate diversity of uses which reflects their position within the hierarchy. In so doing, it is recognised that its character and identity is augmented by the presence of independent traders traditionally operating from the more peripheral streets and in locations and that can be susceptible to competition. It is however recognised that diversification enables other beneficial, economic uses to complement the retailing presence and to maintain the physical fabric and appearance of streets and buildings which may otherwise be susceptible to decline. The potential for appropriate diversification within the town centres enabled through this policy, recognises their contribution to increasing its overall attractiveness. The introduction of complementary retail, leisure and business offers etc can contribute to a broader appeal, nevertheless, the policy recognises the importance of a strong retail element and seeks to maintain the vitality and viability of the towns retail offer."	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives. To relocate and revise wording previously contained within the supporting text for Policy RTC1.	None – this has no perceived implication for the HRA.				
SAR23	Policy RTC1	Delete Policy RTC1 and its supporting text. Consequential amendment to cross references within the Plan to reflect deletion of policy and amendment to SP2 criterion a).	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.	None – this has no perceived implication for the HRA.				
Chapter 11 (Continued) – SP4: A Sustainable Approach to Providing New Homes								
See below	Housing allocations	Overall, there were approximately 199 housing allocations in the 1 st deposit, 35 of these have since been removed and an additional 29 added, leading to approximately 193 housing allocations in total. <table border="1" data-bbox="376 1289 757 1369"> <thead> <tr> <th>Row Labels</th> <th>Number of Allocations</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Row Labels	Number of Allocations			See below	NB: This affects the referencing of sites within
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SAR	Subject	Description	Reason	Implication																																																																												
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SAR24	Removed Sites (no longer in the Plan)	<p>Housing allocation sites which have been removed:</p> <table border="1"> <thead> <tr> <th>Site Ref</th> <th>Locality</th> <th>Site Name</th> <th>Dwellings</th> </tr> </thead> <tbody> <tr> <td colspan="4">Cluster 1</td> </tr> <tr> <td>PrC1/h1</td> <td>Carmarthen</td> <td>Former Health Authority Buildings, Penlan Road</td> <td>8</td> </tr> <tr> <td>PrC1/h6</td> <td>Carmarthen</td> <td>Dolgwili Road</td> <td>26</td> </tr> <tr> <td>PrC1/h13</td> <td>Carmarthen</td> <td>Land south of Pant Glas, Bronwydd Road</td> <td>13</td> </tr> <tr> <td>SeC1/h2</td> <td>Pontyates / Meinciau / Ponthenri</td> <td>Land to the rear of Brynderi</td> <td>7</td> </tr> <tr> <td colspan="4">Cluster 2</td> </tr> <tr> <td>PrC2/h5</td> <td>Llanelli</td> <td>The Avenue, Morfa</td> <td>35</td> </tr> <tr> <td>PrC2/h8</td> <td>Llanelli</td> <td>2-4 Coleshill Terrace</td> <td>9</td> </tr> <tr> <td>PrC2/h11</td> <td>Llanelli</td> <td>Brynmeffys , Furnace</td> <td>54</td> </tr> <tr> <td>PrC2/h17</td> <td>Llanelli</td> <td>Adjacent 73 Parc Gitto, Llwynhendy</td> <td>10</td> </tr> <tr> <td>PrC2/MU2</td> <td>Llanelli</td> <td>Trostre Gateway (mixed use)</td> <td>35</td> </tr> <tr> <td>SeC3/h1</td> <td>Kidwelly</td> <td>Land adjacent to Brodawel</td> <td>9</td> </tr> <tr> <td>SeC6/h5</td> <td>Hendy / Fforest</td> <td>Fforest Garage</td> <td>17</td> </tr> <tr> <td>SeC7/h2</td> <td>Llangennech</td> <td>Aber Llchwyr</td> <td>10</td> </tr> <tr> <td>SuV22/h3</td> <td>Mynyddygarreg</td> <td>Land at Llangadog Road</td> <td>12</td> </tr> <tr> <td colspan="4">Cluster 3</td> </tr> <tr> <td>PrC3/h7</td> <td>Capel Hendre</td> <td>Delfryn Estate</td> <td>15</td> </tr> <tr> <td>PrC3/h10</td> <td>Cross Hands</td> <td>Land to the rear of Gwernllwyn</td> <td>30</td> </tr> </tbody> </table>	Site Ref	Locality	Site Name	Dwellings	Cluster 1				PrC1/h1	Carmarthen	Former Health Authority Buildings, Penlan Road	8	PrC1/h6	Carmarthen	Dolgwili Road	26	PrC1/h13	Carmarthen	Land south of Pant Glas, Bronwydd Road	13	SeC1/h2	Pontyates / Meinciau / Ponthenri	Land to the rear of Brynderi	7	Cluster 2				PrC2/h5	Llanelli	The Avenue, Morfa	35	PrC2/h8	Llanelli	2-4 Coleshill Terrace	9	PrC2/h11	Llanelli	Brynmeffys , Furnace	54	PrC2/h17	Llanelli	Adjacent 73 Parc Gitto, Llwynhendy	10	PrC2/MU2	Llanelli	Trostre Gateway (mixed use)	35	SeC3/h1	Kidwelly	Land adjacent to Brodawel	9	SeC6/h5	Hendy / Fforest	Fforest Garage	17	SeC7/h2	Llangennech	Aber Llchwyr	10	SuV22/h3	Mynyddygarreg	Land at Llangadog Road	12	Cluster 3				PrC3/h7	Capel Hendre	Delfryn Estate	15	PrC3/h10	Cross Hands	Land to the rear of Gwernllwyn	30	A variety of reasons (site specific)	<p>None – this has no perceived implication for the HRA.</p> <p>NB: This affects screening within the HRA Report (ignore the site listed here)</p>
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		PrC3/h17 Drefach (Tumble) Land part of Maesygwern, Heol Caegwyn 23																	
		PrC3/h30 Tumble Land off Gwendraeth Road 9																	
		SeC9/h1 Brynamman Land at Ardwyn Road 6																	
		SeC10/h3 Glanamman / Garnant Former Glanamman Primary School 7																	
		SeC10/h4 Glanamman / Garnant Former Glanamman Hospital 28																	
		Cluster 4																	
		SeC13/h2 Llanybydder Heol y Dderi 30																	
		SeC13/h3 Llanybydder Troedybryn 23																	
		SeC14/h3 Pencader Glanawmor 28																	
		SeC14/h4 Pencader Bro'r Hen Wr 7																	
		SuV31/h1 Drefach/Felindre Parc Puw 12																	
		SuV31/h2 Drefach/Felindre Parc Meirios 10																	
		SuV34/h1 Pentrecwrt Land adjoining Brynywawr 14																	
		SuV37/h1 Cwmann R/O Post Office 20																	
		SuV38/h2 Capel Iwan Land adj Brynglas 5																	
		SuV40/h1 Trelech Clos Y Cynin 8																	
		SuV41/h1 Pontyweli Adj Crug yr Wyn 19																	
		Cluster 5																	
		SeC16/h2 Llandeilo Thomas Terrace 5																	
		SeC16/h3 Llandeilo Land adjacent 28 Carmarthen Rd, Llandeilo 5																	
		SuV47/h1 Talley Land adjoining Ffynnon Dawel 7																	
		SuV48/h1 Cwrt Henri Land adjacent to Glasfryn Court 16																	
SAR25	New sites	29 housing allocation sites which are newly added: ** = according to trajectory (appendix 7)	A variety of reasons (site specific)	Yes – new allocations sites must be appropriately screened (excluding commitments)															
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SAR	Subject	Description					Reason	Implication	
		PrC1/h16	Carmarthen	Rhiw Babel	9	Outline		as these have undergone previous assessment under the Habitats Regulations).	
		PrC1/h17	Carmarthen	4-5 Quay Street	5	Full			
		PrC1/h18	Carmarthen	Castell Howell	7	Full			
		PrC1/h19	Carmarthen	Land adjacent Ty Gwynfa	10	Full			
		PrC1/h20	Carmarthen	5-8 Spilman Street	12	Full			
		PrC1/h21	Carmarthen	Clos Tawelan	18	Full			
		SeC1/h6	Pontyates / Meinciau / Ponthenri	Land off Heol Llanelli	10	Outline			
		SeC1/h7	Pontyates / Meinciau / Ponthenri	Land off Heol Glyndwr	9	Yes			
		SuV12/h2	Llanpumsaint	Llandre	8	Full			
		Cluster 2							
		PrC2/h24	Llanelli	Clos Ffordd Fach	13	Full			
		PrC2/h25	Llanelli	*Land off Clos-y-Berllan	20	Full			
		PrC2/h26	Llanelli	Adjacent to No 19 Llwynhendy Road	6	Full			
		PrC2/h27	Llanelli	42 Stepney Street	8	Full			
		PrC2/h28	Llanelli	Heol Y Graig, Llwynhendy	5	Outline (4), Built (1)			
		PrC2/MU3	Llanelli	Former YMCA, Stepney Street	8				
		SeC8/h3	Trimsaran / Carway	Golwg Gwendraeth	141	RM Granted			
		Cluster 3							
		PrC3/h33	Ammanford (inc Betws and Penybanc)	Llys Dolgader	9	Commitment			
		PrC3/h36	Ammanford (inc Betws and Penybanc)	Betws Colliery	66	RM Granted			
		PrC3/h34	Castell yr Rhingyll	Clos y Gât	5	Full			
		PrC3/h37	Llandybie	*Clos Felingoed	24	Full			

SAR	Subject	Description	Reason	Implication																																																							
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SAR26	Housing allocations	<p>Housing allocation sites which have decreased in the number of proposed Dwellings:</p> <table border="1"> <thead> <tr> <th>Site Ref</th> <th>Locality</th> <th>Site Name</th> <th>4st</th> <th>2nd</th> </tr> </thead> <tbody> <tr> <td colspan="5">Cluster 1</td> </tr> <tr> <td>PrC1/h4</td> <td>Carmarthen</td> <td>Land off Parc y Delyn</td> <td>35</td> <td>17</td> </tr> <tr> <td>PrC1/MU2</td> <td>Carmarthen</td> <td>Pibwrlwyd</td> <td>249</td> <td>247</td> </tr> <tr> <td>SuV3/h1</td> <td>Llansteffan</td> <td>Land to the rear of Maesgriffith</td> <td>49</td> <td>16</td> </tr> <tr> <td>SuV10/h1</td> <td>Peniel</td> <td>South of Pentre</td> <td>40</td> <td>9</td> </tr> <tr> <td>SuV15/h1</td> <td>Llanarthne</td> <td>Llanarthne School</td> <td>40</td> <td>8</td> </tr> <tr> <td colspan="5">Cluster 2</td> </tr> <tr> <td>PrC2/h12</td> <td>Llanelli</td> <td>Llys yr Hen Felin, Town Centre</td> <td>27</td> <td>26</td> </tr> </tbody> </table>	Site Ref	Locality	Site Name	4 st	2 nd	Cluster 1					PrC1/h4	Carmarthen	Land off Parc y Delyn	35	17	PrC1/MU2	Carmarthen	Pibwrlwyd	249	247	SuV3/h1	Llansteffan	Land to the rear of Maesgriffith	49	16	SuV10/h1	Peniel	South of Pentre	40	9	SuV15/h1	Llanarthne	Llanarthne School	40	8	Cluster 2					PrC2/h12	Llanelli	Llys yr Hen Felin, Town Centre	27	26	A variety of reasons (site specific)	This potentially impacts the magnitude of effect originally identified within the HRA Report.										
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		PrC2/h16	Llanelli	Ynys Las, Llwynhendy	45	33		
		PrC2/h19	Llanelli	Genwen, Bryn	260	240		
		PrC2/h22	Llanelli	Cwm y Nant, Dafen	280	202		
		SeC3/h4	Kidwelly	Land at Former Dinas Yard	80	71		
		SeC6/h2	Hendy / Fforest	Land between Clayton Road and East of Bronallt Road	39	20		
		SeC6/h3	Hendy / Fforest	Coed y Bronallt	8	6		
		SeC7/h4	Llangennech	Opposite Parc Morlais	35	32		
		SeC8/h1	Trimsaran / Carway	Ffos Las	233	159		
		SeC8/h2	Trimsaran / Carway	Land to the rear of Cae Linda	50	45		
		SuV22/h1	Mynyddygarreg	Land opposite Parc y Garreg	30	25		
		SuV23/h1	Five Roads / Horeb	Clos y Parc	20	16		
		Cluster 3						
		PrC3/h6	Ammanford (inc Betws and Penybanc)	Land Adjoining Maes Ifan, Maesquarre Road	49	18		
		PrC3/h9	Cross Hands	Land adjacent to Maesyrfhaf	9	5		
		PrC3/h23	Penygroes	Land at Waterloo Road	45	13		
		PrC3/h24	Penygroes	Land between 123 and 137 Waterloo Road	44	7		
		PrC3/h26	Saron	Land off Parc-y-Mynydd	46	15		
		PrC3/h32	Tycroes	Land south of Tycroes Road	62	37		
		SeC11/h1	Pontyberem / Bancffosfelen	Land off Heol Llannon	55	15		
		Cluster 4						
		SuV33/h1	Llangelor	Land opposite Brogeler	8	5		
		SuV35/h1	Saron/Rhos	Land adj. Arwynfa	35	6		
		SuV38/h1	Capel Iwan	Maes y Bryn	44	6		
		SeC7/h4 - This was initially combined with SeC8/h1 but has been separated						

SAR	Subject	Description	Reason	Implication																																																																																																				
SAR27	Housing allocations	Housing allocation sites which have increased in the number of proposed Dwellings:	A variety of reasons (site specific)	This potentially impacts the magnitude of effect originally identified within the HRA Report.																																																																																																				
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SAR28	Name change	Updated naming of PrC2/SS1 Wellness and Life Science Village to Pentre Awel	At request of the developers.	None – this has no perceived implication for the HRA.																																																																																																				

Chapter 11 (Continued) – SP5: Affordable Homes Strategy

SAR	Subject	Description	Reason	Implication
SAR29	Policy SP5	Change to the number of affordable homes from a minimum of 1,600 to 1,766.	To reflect the projected requirement.	the AH has no perceived implication for the HRA.
SAR30	Policy AHOM1	<p>Changes to policy text: The percentage target level for affordable housing is based on the scale of development:</p> <ul style="list-style-type: none"> • sites comprising 10 – 19 homes will be required to provide an affordable housing contribution of 10% 10–15%; • sites comprising 20-50 homes will be required to provide an affordable housing contribution of 12% 12–23%; • sites comprising 51 – 100 homes will be required to provide an affordable housing contribution of 20% • sites of 51 101 homes or more will be required to provide an affordable housing contribution of 25% 30%. 20–25%. <p>The affordable housing target percentage noted is a target to be used as a starting point for affordable housing negotiations. The higher percentage in each range applies to sites in the Council's Affordable Housing Action Area with the highest median household income; and the lower percentage to the Affordable Housing Action Area with the median average household income.</p>	To reflect the projected requirement.	the AH has no perceived implication for the HRA.
SAR31	Policy AHOM2	<p>Changes to policy text: For clarity, development sites which include 100% affordable housing must accord with the criteria of this policy.</p> <p>11.125 An affordable Dwellings must be compatible with WG's Design Quality Requirement standards to limit its size, scale, and design to ensure that the Dwellings falls within a reasonable and acceptable affordable Dwellings cost for future occupants. In exceptional circumstances, a departure from these standards may be considered appropriate where they are to meet the occupant's needs and are clearly evidenced and justified.</p> <p>11.126 The Council may remove or restrict permitted development rights to place limitations upon amendments to the Dwellings's size, scale, and design to ensure its continued affordability for subsequent occupants.</p>	To reflect the projected requirement.	the AH has no perceived implication for the HRA.
Chapter 11 (Continued) – SP6: Strategic Sites				
SAR32	Policy SP6	<p>Amend the first line of paragraph 2 of Policy SP5 to read as follows:</p> <p>"Pentre Awel, Llanelli (PrC2/SS1);"</p>	To reflect the name of the strategic site.	None – this has no perceived

SAR	Subject	Description	Reason	Implication																																
		Consequential amendment in that the site will be renamed as per the above elsewhere in the Plan.		implication for the HRA.																																
Chapter 11 (Continued) – SP7: Employment and the Economy																																				
SAR33	Policy SP7	<p>Amend the allocation figure in the first sentence of Policy SP7 to 77.93 71.21 Ha.</p> <p>Table 6 amended accordingly, difference summarised below:</p> <table border="1"> <thead> <tr> <th>Area</th> <th>1st rLDP ha</th> <th>2nd rLDP ha</th> <th>Difference +/-</th> </tr> </thead> <tbody> <tr> <td>PC1 Carmarthen</td> <td>19.14</td> <td>18.687</td> <td>-0.453</td> </tr> <tr> <td>PC2 Llanelli</td> <td>15.77</td> <td>17.489</td> <td>+1.719</td> </tr> <tr> <td>PC3 Ammanford/Cross Hands</td> <td>35.48</td> <td>28.118</td> <td>-7.362</td> </tr> <tr> <td>Services Centres</td> <td>7.54</td> <td>6.916</td> <td>-0.624</td> </tr> <tr> <td>Sustainable Villages</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Rural Villages</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>TOTAL</td> <td>77.93</td> <td>71.21</td> <td>-6.72</td> </tr> </tbody> </table>	Area	1 st rLDP ha	2 nd rLDP ha	Difference +/-	PC1 Carmarthen	19.14	18.687	-0.453	PC2 Llanelli	15.77	17.489	+1.719	PC3 Ammanford/Cross Hands	35.48	28.118	-7.362	Services Centres	7.54	6.916	-0.624	Sustainable Villages	0	0	0	Rural Villages	0	0	0	TOTAL	77.93	71.21	-6.72	Consequential amendment resulting from the reduction in overall employment allocations, although increase in PC2 Llanelli.	Yes – Amend site allocation in HRA and review, where necessary
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SAR34	Policy EME3	<p>Several employment allocations have been split up.</p> <table border="1"> <tbody> <tr> <td rowspan="3">PrC1/E1 Cillefwr Industrial Estate</td> <td>PrC1/E1 (i) Land west of Cillefwr Road West</td> </tr> <tr> <td>PrC1/E1 (ii) Land north of Alltynap Road</td> </tr> <tr> <td>PrC1/E1 (iii) Land south of Alltynap Road</td> </tr> <tr> <td rowspan="5">PrC2/E2 Dafen</td> <td>PrC2/E2 (i) Land east of Calsonic (new)</td> </tr> <tr> <td>PrC2/E2 (ii) Land west of Gestamp Tallent</td> </tr> <tr> <td>PrC2/E2 (iii) Land at Heol Aur</td> </tr> <tr> <td>PrC2/E2(iv) Land west of Heol Gors</td> </tr> <tr> <td>PrC2/E2 (v) Land at Heol Croppin</td> </tr> </tbody> </table>	PrC1/E1 Cillefwr Industrial Estate	PrC1/E1 (i) Land west of Cillefwr Road West	PrC1/E1 (ii) Land north of Alltynap Road	PrC1/E1 (iii) Land south of Alltynap Road	PrC2/E2 Dafen	PrC2/E2 (i) Land east of Calsonic (new)	PrC2/E2 (ii) Land west of Gestamp Tallent	PrC2/E2 (iii) Land at Heol Aur	PrC2/E2(iv) Land west of Heol Gors	PrC2/E2 (v) Land at Heol Croppin	Categorical Amendment	<p>None – this has no perceived implication for the HRA.</p> <p>NB: This affects referencing within the HRA Report.</p>																						
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SAR35	Policy EME3	Employment allocations which have been removed: PrC2/E1 – North Dock (0.84ha) PrC3/E4 – Meadows Road, Cross Hands (1.09ha) PrC3/E5 – Parc Menter, Cross Hands (0.09ha)	PrC2/E1 – Flood risk PrC3/E4 – Ecological issues PrC3/E5 – Too small, site remains as white land within development limits	Yes – Amend site allocation in HRA and review, where necessary																										
SAR36		Employment allocations which have reduced in size (ha): <table border="1"> <thead> <tr> <th>Site Reference</th> <th>1st rLDP</th> <th>2nd rLDP</th> <th>Reduction</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Site Reference	1 st rLDP	2 nd rLDP	Reduction					Consequential amendment resulting from the	Yes – Amend site allocation in HRA and																		
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SAR37	Policy EME3	<p>Employment allocations which are newly added:</p> <p>PrC2/E2 (i) – Land east of Calsonic (4.457ha) (part of overall allocation of PrC2/E2 Dafen)</p> <p>Employment allocations which have increased in size (ha):</p> <table border="1"> <thead> <tr> <th>Site Reference</th> <th>1st rLDP</th> <th>2nd rLDP</th> <th>Increase</th> </tr> </thead> <tbody> <tr> <td>PrC2/E2 Dafen (including 4.457ha of PrC2/E2 (i) Land east of Calsonic)</td> <td>14.93</td> <td>17.223</td> <td>+2.293</td> </tr> <tr> <td>PrC3/E3 Cross Hands Business Park</td> <td>4.73</td> <td>4.76</td> <td>+0.03</td> </tr> </tbody> </table>	Site Reference	1 st rLDP	2 nd rLDP	Increase	PrC2/E2 Dafen (including 4.457ha of PrC2/E2 (i) Land east of Calsonic)	14.93	17.223	+2.293	PrC3/E3 Cross Hands Business Park	4.73	4.76	+0.03	Consequential addition of employment allocations.	<p>Yes – Amend site allocation in HRA and review, where necessary.</p> <p>These sites may need screening.</p>																												
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SAR38	Para 11.142	<p>Add the following paragraph before paragraph 11.142:</p> <p>“A report published by the Welsh Government in 2020 to inform the new Property Delivery Plan highlights that while delivery of industrial and office accommodation is generally led by the private sector, there are strong grounds for public sector intervention, including responding to evidence of demand for new or additional capacity, attracting and retaining investment that would not otherwise come an area, or through influencing commercial decisions for example by bringing new economic activity to a redundant site.”</p>	To reflect the latest information published by the Welsh Government.	None – this has no perceived implication for the HRA.																																								

SAR	Subject	Description	Reason	Implication
SAR39	Para 11.143	<p>Add the following new sentence at the end of paragraph 11.143:</p> <p>“In noting these 3 Carmarthenshire projects specific to Carmarthenshire, it should be noted that ‘The Homes as Power Stations project’ aims to deliver smart, low carbon, energy-efficient homes through a co-ordinated approach across the City Region , whilst the ‘Digital Infrastructure’ project aims include supporting a thriving digital economy across the City Region.”</p> <p>Consequential footnotes to be added referencing the following: https://www.swanseabaycitydeal.wales/projects/homes-as-power-stations/ https://www.swanseabaycitydeal.wales/projects/digital-infrastructure/</p>	To fully reflect the Swansea Bay City Deal context.	None – this has no perceived implication for the HRA.
SAR40	Para 11.147	<p>Add the following paragraph after paragraph 11.147:</p> <p>“The Council recognises that there are clearly experiences arising from the Covid 19 pandemic which have big implications for future working practices and the future needs of workspace (confirming the importance of flexibility); In this context, a key area is the importance of high quality communications infrastructure (broadband, mobile reception and ability to future proof/upgrade). This is important for residents and business especially in the context of greater remote working and its role in addressing the peripherality of the rural areas (reference should be made to Policy EME5: Home Working and Policy INF3: Broadband and Telecommunications).”</p>	To reflect the impact of the Covid 19 pandemic.	None – this has no perceived implication for the HRA.
SAR41	Para 11.151	<p>Add the following sentence at the end of paragraph 11.167:</p> <p>“This has an enhanced importance as a result of the Covid-19 pandemic and the likely implications for future work trends/workspace, as well as the need for reliable super-fast broadband (reference should be made to Policy INF3: Broadband and Telecommunications).”</p>	To reflect the impact of the Covid-19 pandemic.	None – this has no perceived implication for the HRA.
Chapter 11 (Continued) – SP8: Welsh Language				
SAR42	WL1	<p>Changes to policy text:</p> <p>All development proposals throughout Carmarthenshire will be required to safeguard, and promote and enhance the Welsh language.</p> <p>The following development proposals will be required to submit a Language Action Plan, setting out the measures to be taken to safeguard, promote and enhance the Welsh language:</p> <p>a) Residential developments of 10 or more homes in the Principal Centres and Service Centres; of 5 or more Dwellings which will individually or cumulatively provide more than the indicative housing provision set out for the settlement in Policies HOM1 and HOM3; or</p>	To reflect updated baseline data and recommendations within the WLIA	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
		<p>b) Residential development of 5 or more Dwellings on allocated or windfall sites that do not address evidence of need and demand for housing recorded in a Housing Market Assessment or other relevant local sources of evidence; or s of 5 or more homes in the Sustainable Villages; and,</p> <p>c) Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more or a site area measuring more than 1 hectare.</p> <p>Windfall Sites The following proposals on windfall sites will be required to submit a Welsh Language Impact Assessment in support of a planning application as well as a Language Action Plan setting out the measures to be taken to safeguard, promote and enhance the Welsh language:</p> <p>d) — Developments of 10 or more homes in the Principal Centres and Service Centres; e) — Developments of 5 or more homes in the Sustainable Villages; and, f) — Retail, commercial commercial, or industrial developments with a total floorspace of 1,000 sqm or more.</p> <p>Proposals on unanticipated windfall sites for large scale housing development or large-scale employment development that would lead to a significant workforce flow are required to submit a Welsh Language Impact Assessment which will set out how the proposed development will protect, promote and enhance the Welsh language.</p> <p>Proposals which do not accord with the Plan’s housing trajectory (Appendix 7) will be required to provide a phasing plan outlining the timescales for delivering the homes proposed on the site, andsite and demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated. Residential developments for 10 or more homes on both allocated and windfall sites will be required to positively contribute towards the vitality and viability of Welsh language community groups and Welsh language learning opportunities.</p>		
Chapter 11 (Continued) – SP9: Infrastructure				
SAR43	Policy SP9 SP9 Supporting text new Para	<p>Amend Policy wording to include the following: Proposals for ancillary development to the utilities infrastructure will be permitted where</p> <p>a) They have regard to their setting; b) Incorporate landscaping; c) Do not conflict it with the area’s built, historic, cultural and nature conservation and landscape qualities.</p> <p>Insert the following new paragraph within the supporting text of Policy SP9:</p>	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
		<p>“Reference is made to the preparation of Drainage and Wastewater Management Plans (DWMPs) as prepared by Dwr Cymru Welsh Water. It is anticipated that the DWMPs will compliment the implementation of this LDP through the management of the drainage and sewerage network.”</p>		
SAR44	Policy INF1 Supporting text 11.191	<p>Insert the following new paragraph within the supporting text of INF1</p> <p>11.191 The planning obligations required will be considered on a case by case basis subject to the nature of the proposal and the requirements emerging from it. There may be instances where all required obligations cannot be secured due to their impact upon the scheme’s financial viability. In such cases, the infrastructural priorities for that site will need to be identified. Whilst the priorities can vary according to the specific needs of each site and their communities it should be noted that the requirements of Policy NE4 Development within the Caeau Mynydd Mawr SPG Area will be prioritised above other contributions in respect of sites within the SPG Area. In all other instances, it is generally considered that the priority for the Authority will be the provision of affordable housing and in most cases its provision will be prioritised above other contributions.</p> <p>Removal of : meet the costs of securing an independent viability appraisal, completed by a suitably qualified and approved third party</p> <p>11.190 The planning obligations required will be considered on a case by case basis subject to the nature of the proposal and the requirements emerging from it. There may be instances where all required obligations cannot be secured due to their impact upon the scheme’s financial viability. In such cases, the infrastructural priorities for that site will need to be identified. Whilst the priorities can vary according to the specific needs of each site and their communities it should be noted that the requirements of Policy NE4 Development within the Caeau Mynydd Mawr SPG Area will be prioritised above other contributions in respect of sites within the SPG Area. In all other instances, it is generally considered that the prioritypriority for the Authority will be the provision of affordable housing and in most cases its provision will be prioritisedprioritised above other contributions</p>	In the interests of clarity and in response to collaboration with project management.	None – this has no perceived implication for the HRA.
SAR45	Policy INF3	<p>Amend Policy wording to include the following:</p> <p>“New developments should include the provision of Gigabit capable broadband infrastructure from the outset” after the first paragraph.</p>	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR46	Para 11.197	<p>Include the following wording after ‘change’:</p> <p>“The policy reflects the provisions of Future Wales: The National Plan 2040 which supports the provision of Gigabit capable digital infrastructure into new developments where people are present, for example new housing, business and commercial premises, and public buildings.”</p>	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
SAR47	Para 11.198	Amend the second sentence of para 11.198 to read as follows: “FTTP shall be provided free of charge to housing developments by BT Openreach based upon their thresholds at that time.”	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR48	Policy INF4	Change the name of Policy INF4 to the following: “Llanelli Wastewater Treatment Works Catchment Surface Water Removal”. Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR49	11.202	Insert the word "catchment" in place of the word "area" in the final sentence of paragraph 11.202. Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR50	11.203	Insert the following text at the end of paragraph 11.203: “In noting the specific reference to Dwr Cymru Welsh Water in this paragraph, it should be noted that the consideration of these matters is subject to a multi-agency approach which includes Dwr Cymru Welsh Water, Natural Resources Wales and Carmarthenshire County Council. Also, the City and County of Swansea are included in discussions in regards the Burry Inlet. The Statement of Common Ground will accompany and support the implementation of Policy INF4 and its supporting SPG”. Undertake any consequential amendment to the Burry Inlet Draft SPG as a result. Refer also to FCWS/67.	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR51	11.204	Insert the words "combined sewer overflows" in place of the words "storm sewerage overflows" in the first sentence of paragraph 11.204. Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR52	11.207	Insert the following text at the end of paragraph 11.207: “Policy INF4 reflects this partnership approach moving forward. Reference should be made to paragraph 11.203 in regards the reference to the Statement of Common Ground.” Undertake any consequential amendment to the Burry Inlet Draft SPG as a result. Refer also to FCWS/65.	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
SAR53	11.208	Insert the words “ or landowner ” after the word “applicant” in paragraph 11.208. Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR54	Policy INF5	New policy: “INF5: Rural Allocations outside Public Sewerage System Catchments Proposals for the delivery of sites of 5 or more Dwellings in settlements where there is no connection to the public sewer will be supported where they are served by a single private system. Such proposals will be permitted where it does not have a detrimental effect on the natural environment, surrounding uses or local amenity. There is concern that the proliferation of private sewers is having a detrimental impact on the environment. This policy aims to discourage a development from having individual private sewers and instead encourage utilisation of a shared private sewerage system.”	See SAR9	See SAR9
Chapter 11 (Continued) – SP10: Gypsy and Traveller Provision				
SAR55	Policy SP10	Insert the following new paragraph within the supporting text of SP10 “To consider the future Gypsy and Traveller provision within Carmarthenshire, the County Council has undertaken two Gypsy Traveller Accommodation Needs Assessment (GTAA) which identify the current unmet need for Gypsy and Traveller pitches within the County. The initial report was undertaken in 2015 to cover the period up to 2031, whilst the 2019 update ensures that the Plan is informed in terms of Gypsy and Traveller need for the Plan period through to 2033. 11.210 The Assessments consider the methodology set out by Welsh Government Guidance and outlines two types of the assessment of need; the first considers the first 5 years of the GTAA period; and the second considers the full 15 year GTAA period.”	To incorporate findings of the updated GTAA.	None – this has no perceived implication for the HRA.
SAR56	Policy GT1	Remove the words “(relating to where the need has been identified)” from criterion 2 of the policy.	Contrary to Welsh Government Circular 005/2018 and acts against the freedom of movement for Gypsy and Travellers who wish to develop their own sites.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
SAR57	Para 11.214	<p>Insert new sentence at the end of paragraph 11.214 as follows:</p> <p>“In the wake of ash dieback, no ash trees should be introduced.”</p>	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
Chapter 11 (Continued) – SP11: The Visitor Economy				
SAR58	Policy VE2	<p>Amend Policy wording to include the following: Proposals for serviced and self-catering accommodation that are located outside of the above locations will only be permitted where they consist of the re-use and adaptation (including conversion) of existing buildings in conjunction with policy RD4. Proposals for the re-use and adaptation (including conversion) of existing buildings should comply with the following criteria:</p> <p>a) the form, bulk and general design of the proposal, including any extensions, respect the rural character and appearance of the building;</p> <p>b) the original building is structurally sound and any rebuilding works, necessitated by poor structural conditions and/ or the need for new openings in walls, do not involve substantial reconstruction;</p> <p>c) where applicable, the architectural character and traditional materials have been retained and the proposal does not result in the loss of the original structure’s character, or that the construction of the building is of sufficient quality not to require substantive or wholesale refurbishment;</p> <p>d) the proposal conforms with criteria a), b) and c) of Policy RD4.</p>	In the interests of clarity.	None – this has no perceived implication for the HRA.
Chapter 11 (Continued) – SP13: Rural Development				
SAR59	Policy RD2	<p>Amend Policy wording to:</p> <p>Proposals for the conversion and re-use of suitable rural buildings for residential use will be permitted where:</p> <p>a) the existing use has ceased, and its re-use would not result in the need for an additional building;</p> <p>b) the design and materials are of a high quality, and the form and bulk of the proposal, including any extensions, curtilage and access arrangements are sympathetic to and respect: the surrounding landscape, rural character of the area and the appearance of the original building;</p> <p>c) Proposals for extensions should be proportionate and reflective of the scale, character and appearance of the original building;</p> <p>d) the original building is structurally sound and any rebuilding works, necessitated by poor structural conditions and/ or the need for new openings in walls, do not involve substantial reconstruction;</p> <p>e) where applicable, the architectural quality, character and appearance of the building is safeguarded and it’s setting not unacceptably harmed.</p>	In the interests of clarity.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
		Proposals relating to buildings which are of a modern portal framed construction will not generally be considered appropriate for residential conversion.		
Chapter 11 (Continued) – SP14: Maintaining and Enhancing the Natural Environment				
SAR60	Policy SP14	<p>Amend Policy wording to: Development proposals must protect and enhance the County’s natural environment.</p> <p>Proposals must reflect the role that natural environment aspects and features and an ecologically connected environment have in protecting and enhancing biodiversity, defining the landscape, contributing to Well-being and the principles of the Sustainable Management of Natural Resources.</p> <p>All development proposals must be considered in accordance with National Policy and legislative requirements where a proposal for development would result in a significant adverse effect on designated sites, including European sites, SSSIs, and priority habitats and species.</p> <p>Any development proposal should contribute towards the overall aim of the South West Wales Area Statement (NRW, 2020) in building resilience of our ecosystems and enhancing the benefits they provide. Development that would result in unacceptable adverse environmental effects or that does not result in enhancement of biodiversity will not be permitted.</p> <p>Development must not cause any significant loss of habitats or populations of species (locally and/or nationally) and must provide net benefits for biodiversity. Where biodiversity enhancement is not proposed as part of a proposal for development, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission.</p>	To reflect the priorities of the nature emergency, SWWAS and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR61	Policy NE1	<p>Amend Policy wording to: Development proposals that will result in adverse effects to a Local Nature Reserves (LNR), Site of Importance for Nature Conservation (SINC), and/or Regionally Important Geological/Geomorphological Site (RIGS), will only be permitted where it can be demonstrated that:</p> <ol style="list-style-type: none"> i. All adverse impacts are addressed in accordance with the mitigation hierarchy; ii. Where this is not feasible, ensure sufficient compensatory measures are put in place which address all potential adverse impacts upon these sites resulting from the proposal; or iii. In exceptional circumstances, where the reasons for the development and/or land use change clearly outweighs the need to safeguard conservational interests of the site. <p>Development proposals must not cause any significant loss of habitats or populations of species, locally or nationally, and must provide net benefits for biodiversity.</p>	To reflect the priorities of the nature emergency	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
SAR62	Policy NE2	<p>Amend Policy wording to:</p> <p>Development proposals must maintain and enhance biodiversity in accordance with Section 6 of the Environment (Wales) Act 2016.</p> <p>Proposals will not be permitted where they would result in an adverse impact on priority species and habitats, and features of recognised importance to the conservation of biodiversity, except where it can be demonstrated that:</p> <ul style="list-style-type: none"> i. All adverse impacts are addressed in accordance with the mitigation hierarchy; ii. Where this is not feasible, ensure sufficient compensatory measures are put in place which address all potential adverse impact upon biodiversity resulting from the proposals; and iii. In exceptional circumstances, where the reasons for the development and/or land use change clearly outweighs the need to safeguard the biodiversity and nature conservation interests of the site. <p>Development proposals must not cause any significant loss of habitats or populations of species, locally or nationally, and must provide net benefits for biodiversity.</p>	To reflect the priorities of the nature emergency	None – this has no perceived implication for the HRA.
SAR63	Policy NE3	<p>Amend Policy wording to: Development proposals will be expected to maintain and enhance ecological corridors, networks, and features of distinctiveness. Proposals which include provision for the retention and appropriate management of such features will be supported.</p> <p>Proposals that result in an adverse effect on the connectivity or integrity of ecological corridors, networks or features of distinctiveness will only be permitted where:</p> <ul style="list-style-type: none"> 1. All adverse impacts are addressed in accordance with the mitigation hierarchy; 2. Where this is not feasible, ensure sufficient compensatory measures are put in place which address all potential adverse effects upon biodiversity resulting from the proposals; and 3. In exceptional circumstances, where the reasons for the development and/or land use change clearly outweighs the need to safeguard the biodiversity and nature conservation interests of the site. <p>Development proposals must not cause any significant loss of habitats or populations of species, locally or nationally, and must provide net benefits for biodiversity.</p>	To reflect the priorities of the nature emergency	None – this has no perceived implication for the HRA.
SAR64	Policy NE4	<p>Amend Policy wording to: Development proposals will be permitted where they accord with the Council's commitment to promote and contribute to the delivery of the Conservation Objectives of the Caeau Mynydd Mawr Special Area of Conservation (CMM SAC) in line with the Habitats Regulations. Proposals located within the SPG Area will be required to contribute towards increasing the quality and amount of available habitat for the Marsh Fritillary butterfly within the SPG Area. To achieve the Conservation Objectives and to mitigate for the loss of potential supporting habitat and connectivity for the marsh fritillary butterfly that may result through the development, the Council will (where applicable) seek to secure Planning Obligations (in accordance with LDP policy INF1 and the provisions of the SPG for the CMM SAC) from developments within the SPG area.</p>	To reflect the priorities of the CMM SAC	None – this has no perceived implication for the HRA.
Chapter 11 (Continued) – SP15: Protection and Enhancement of the Built and Historic Environment				

SAR	Subject	Description	Reason	Implication
SAR65	Policy BHE2	Amend wording of criterion b) to read as follows ‘protecting international and national landscape designations including National Parks and Areas of Outstanding Natural Beauty (AONB) and their settings.’	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
Chapter 11 (Continued) – SP16: Climate Change				
SAR66	Policy SP16	Amend Policy wording to: Development proposals will be supported if they respond, adapt, increase resilience, and minimise the causes and impacts of climate change. Proposals must: a) Contribute to a reduction in carbon emissions by reflecting sustainable transport principles and minimising the need to travel, particularly by private motor car; b) Avoid, or where appropriate, minimise the risk of flooding including the incorporation of measures (such as SuDS and flood resilient design); c) Promote the energy hierarchy by reducing energy demand, promoting energy efficiency, and increasing the supply of renewable energy; d) Incorporate appropriate climate responsive design solutions including orientation, layout, density, and low carbon solutions (including design and construction methods) and utilise sustainable construction methods where feasible; and/or e) Contribute towards the protection and enhancement of GBI assets and resilient ecological networks as carbon sinks. Development proposals which are located within areas at risk from flooding will not be permitted unless they accord with the provisions of Planning Policy Wales TAN 15.	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR67	Policy CCH1	Amend Policy wording to: Proposals for large scale wind farms of 10MW and over will be permitted within identified Pre-Assessed Areas for Wind Energy, as identified in “Future Wales” subject to them meeting them meeting criteria set below. Proposals for solar developments of 5MW and larger will be permitted in identified Local Search Areas, provided they do not have an unacceptable impact on visual amenity or landscape character and that they meet the criteria set below: a. The development will not have an unacceptable impact on roads, rail or aviation safety; electromagnetic interference to communications installations, radar or air traffic control systems, emergency services communications or other telecommunications systems; b. Proposals will not cause an unreasonable risk or nuisance to, and impact upon the amenities of, nearby residents or other members of the public, and will not result in unacceptable loss of public accessibility to the area;	In the interests of clarity and in response to representation from statutory consultee.	Yes – needs screening.

SAR	Subject	Description	Reason	Implication
		<p>c. Proposals should be accompanied with appropriate mitigation measures where required, including satisfactory restoration of land following decommissioning.</p>		
SAR68	Policy CCH2	<p>New Policy wording: Proposals for renewable and low carbon energy development and associated infrastructure, approved, will be permitted provided they accord with the following:</p> <p>a. The development will not have an unacceptable impact on visual amenity or landscape character through: through the number, scale, size, design and siting of turbines and associated infrastructure;</p> <p>b. The development will not have an unacceptable impact upon areas designated for their landscape value;</p> <p>c. Wind turbine developments should not have unacceptable cumulative impacts in relation to existing wind turbines componentsturbines components, those which have permission or are proposed;</p> <p>d. The development will not have an unacceptable impact on roads, railrail, or aviation safety; electromagnetic interference to communications installations, radar or air traffic control systems, emergency services communications or other telecommunications systems;</p> <p>e. Proposals will not cause an unreasonable risk or nuisance to, and impact upon the amenities of, nearby residents or other members of the public, and will not result in unacceptable loss of public accessibility to the area;</p> <p>f. Proposals should be accompanied with appropriate mitigation measures where required, including satisfactory restoration of land following decommissioning.</p> <p>Table 9 and 10 also updated</p>	In the interests of clarity.	Yes – needs screening.
SAR69	CCH3 - Supporting text: New paragraph	<p>Insert the following new paragraph within the supporting text to CCH3: “This provision of this policy seeks to future-proof new housing as part of the Councils commitment to tackling the declared climate change emergency. However, it is recognised that as capacity improves across the grid there may be circumstances where he current and projected capacity is unable to meet the demands arising from the policy in relation to a particular development. In such circumstance’s application should be accompanied by robust evidence detailing any such issues including viability implications in the undertaking of any infrastructure improvements would have on the development. Reference should be had to the SPG for ULEV requirements in new developments. “</p>	<p>In response to a representation received and to improve the implementation of the policy and site delivery.</p> <p>The requirement for preparation of SPG will provide added clarity in the implementation of the policy and</p>	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
			enable a more responsive approach having regard to technological developments and changes in market demand.	
SAR70	CCH4	<p>Amend Policy wording:</p> <p>Proposals for development will be permitted where they do not compromise or lead to a deterioration in either the water resource or the quality of controlled waters. Proposals will, where appropriate, be expected to contribute towards improvements to water quality.</p> <p>Watercourses will be safeguarded through ecological buffer zones or corridors to protect aspects such as riparian habitats and species, water quality, and provide for flood plain capacity. Proposals will be permitted where they do not have an adverse impact on nature conservation, fisheries, public access, or water related recreation use of the rivers in the County.</p> <p>Development proposals must make efficient use of water resources and where appropriate, contribute towards improvements to water quality. SuDS must be implemented where appropriate with approval required through the Sustainable Drainage Approval Body (SAB)</p> <p>“Development proposals must make efficient use of water resources and, where appropriate, contribute towards improvements in water quality. Proposals will be permitted where they do not have an adverse effect upon water resources, water quality, fisheries, nature conservation, public access, or water related recreation use in the County.</p> <p>Where appropriate, SuDS must be implemented with approval required through the Sustainable Drainage Approval Body (SAB).</p> <p>Proposals will be supported if they promote the safeguarding of watercourses through ecological buffer zones or corridors, protecting aspects such as riparian habitats and species, water quality, and providing for flood plain capacity.</p> <p>Development will only be permitted if it can be demonstrated that there is no adverse effect on the integrity of phosphorus sensitive riverine Special Areas of Conservation (SACs). In the hydrological catchment area designated for riverine SACs, development creating wastewater discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC. This can be achieved through implementation of mitigation measures and associated supplementary planning guidance. Where evidence demonstrates that</p>	Made in response to the HRA Addendum.	

SAR	Subject	Description	Reason	Implication
		adverse effects on the integrity of river SAC can be avoided or offset using mitigation, these must be agreed with the Council on a case-by-case basis, in consultation with NRW.”		
SAR71	CCH4	Supporting text of CCH4 amended to reflect recent developments in relation to phosphates.	To support the amendments made to the policy wording and to response to emerging issue.	None – this has no perceived implication for the HRA.
SAR72	CCH5	Add the following wording at the end of criterion a) of policy CCH5 to state as follows: “However, only less vulnerable development will be permitted within Zone C2.” Consequential amendment of deletion of sentence 2 of paragraph 11.521	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR73	CCH7	Amend Policy wording to: Support will be given to proposals which seek the creation and protection of new (or the enhancement of existing) woodland, forests, tree belts and corridors, and where they promote the delivery of the national and local decarbonisation targets. Support will be given to proposals that will deliver the multiple benefits associated with well-designed and well managed trees, woodlands, and forests (e.g., carbon sequestration, flood alleviation, improvements in air and water quality, nutrient mitigation, biodiversity and nature recovery, landscape, health and well-being, and amenity value). Proposals should consider potential adverse effects upon the environment, cultural heritage, communities, and landscape, and, where appropriate, follow the mitigation hierarchy.	In the interests of clarity and in response to collaboration with internal ecologists.	None – this has no perceived implication for the HRA.
Chapter 11 (Continued) – SP17: Transport and Accessibility				
SAR74	TRA4	Insert the following text at the end of the policy ‘The importance of redundant rail corridors as wildlife corridors and opportunities for expanding the network of green and blue infrastructure is recognised.’	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
Chapter 11 (Continued) – SP18: Mineral Resources				
SAR75	Policy SP18	Add the following wording to the end of Policy SP18:	In response to representation from statutory consultee,	None – this has no perceived

SAR	Subject	Description	Reason	Implication
		<p>“For sand and gravel, an ‘Area of search’ has been defined on the Proposals Map which will form the basis for future exploration and production in order to satisfy the broader subregional requirement as set out in RTS2.”</p> <p>Refer to FCM/SG/a in the Schedule of Focused Changes: Proposals Maps.</p>	and to reflect the provisions of Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties– Second Review (RTS2).	implication for the HRA.
SAR76	Policy SP18 Subsection a)	<p>Text of subsection a) of Policy SP18 to be amended to:</p> <p>“Ensuring an adequate supply of minerals, including maintaining an adequate landbank of permitted aggregate reserves (a minimum 10 years for hard crushed rock, and a minimum 7 years for sand and gravel) throughout the Plan period;”</p>	In the interests of clarity and in response to a representation received.	None – this has no perceived implication for the HRA.
SAR77	Policy SP18 Subsection c)	<p>Text of subsection c) of Policy SP18 to be amended to:</p> <p>“Safeguarding minerals infrastructure, and areas underlain by minerals of economic importance where they could be worked in the future, to ensure that such resources and infrastructure are not unnecessarily sterilised by other forms of development;”</p>	In the interests of clarity and in response to a representation received.	None – this has no perceived implication for the HRA.
SAR78	Para. 11.555	<p>Amend the first sentence of paragraph 11.555 in accordance with PPW10, paragraph 5.14.2, bullet point 1 as follows:</p> <p>“The LDP will seek to ensure that the County provides positively for the working of mineral resources to meet society’s needs, and that such resources and minerals infrastructure are safeguarded from sterilisation.”</p>	In the interests of clarity and in response to a representation received.	None – this has no perceived implication for the HRA.
SAR79	Para. 11.557 & 11.558	<p>Amend paragraphs 11.557 and 11.558 to reflect the recent publication of the RTS 2nd Review, as follows (N.B the new wording comprises 5 paragraphs. Consequential changes will be made to subsequent paragraph numbers):</p> <p>“The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties– Second Review (RTS2) (September 2020) sets out the contribution that each constituent local authority should make towards meeting the regional demand for aggregates (both hard crushed rock, and sand and gravel).</p>	To reflect the recent publication of the RTS 2nd Review and in response to a representation.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
		<p>For crushed rock, Carmarthenshire forms part of the Swansea City Sub-region, along with the local authorities of Swansea and Neath Port Talbot. Although a present, Swansea is unable to demonstrate an inability to meet RTS2 apportionments, there are more than sufficient reserves within NPT and Carmarthenshire to take up the joint apportionment within this period without resulting in under provision. A statement of sub-regional collaboration (SSRC) has been produced which demonstrates how the constituent Authorities satisfy the requirements of RTS2 in respect of future crushed rock provision.</p> <p>In terms of sand and gravel provision, it must be noted that the First Review of the RTS (RTS1) suggested that there would be merit in developing a combined approach to future apportionments and allocations between Pembrokeshire, Ceredigion and Carmarthenshire. Although Carmarthenshire is in a separate sub-region (primarily because of the market for crushed rock in the Swansea area), it is recommended in RTS2 that these joint working arrangements should continue, with regard to sand & gravel. Therefore, there needs to be a joint approach to provision of the allocation requirement for 3.626 million tonnes over the period up to 2038.</p> <p>In the event that the allocations for sand and gravel in the three constituent authorities are not sufficient to meet the 3.626 million tonnes over the period up to 2038, then Consequently, an ‘area of search’ for sand and gravel has been identified on the proposals map (with further areas being identified by Pembrokeshire and Ceredigion in their respective Revised LDPs). Furthermore, a statement of sub-regional collaboration (SSRC) has been produced which demonstrates how the constituent Authorities satisfy the requirements of RTS2 in respect of future sand and gravel provision.</p> <p>In respect of working the resource within the area of search, this will not be carried out within 100m of residential properties. Furthermore, proposals will need to accord with the criteria set out within Policy MR1 Mineral Proposals.”</p>		
SAR80	Policy MR1	<p>Amend Policy MR1 to include an additional criterion will be included as follows:</p> <p>“Effective measures should ensure that utilities infrastructure is protected.”</p>	In the interests of clarity and in response to representation from statutory consultee.	None – this has no perceived implication for the HRA.
SAR81	Para. 11.560	<p>Amend the first paragraph of 11.560 to read as follows:</p> <p>“The purpose of the policy is to maintain a balance between meeting national, regional and local demand for minerals and minimising the potential adverse effects that could result from such operations.”</p>	In the interests of clarity and in response to a representation received.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
SAR82	MR2 Para. 11.562	Amend the first sentence of paragraph 11.562 to read as follows: "Buffer zones are used to provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals, schools, should be resisted."	In the interests of clarity and to reflect the provisions of Planning Policy Wales.	None – this has no perceived implication for the HRA.
SAR83	Para. 11.562	Amend the last sentence of paragraph 11.562 to read as follows: "The identification of buffer zones will ensure that there is clear guidance on the proximity of mineral operations to sensitive land uses, and that the potential impact of mineral workings is recognised and planned for in the area around the existing and proposed mineral operations."	In the interests of clarity and to reflect the provisions of Planning Policy Wales.	None – this has no perceived implication for the HRA.
SAR84	Policy MR3	Amended the title of Policy MR3 to read as follows: "MR3: Mineral Safeguarding Areas " Amend policy MR3 to delete reference to 'Areas of Search'.	In the interests of clarity and to reflect national policy.	None – this has no perceived implication for the HRA.
SAR85	Para. 11.565	Change reference to Policy 'MPP1' to Policy 'MR1'.	In the interests of clarity and to amend a typographic error.	None – this has no perceived implication for the HRA.
Chapter 12 – Monitoring and Implementation				
SAR86	Monitoring Framework	Amend the monitoring and implementation framework to reflect the provisions of the LDP Manual Edition 3. Specific reference will be made to monitoring mechanisms around site delivery.	To reflect national guidance.	None – this has no perceived implication for the HRA.
Chapter 13 – Glossary (several updated definitions in addition to the example provided below)				
SAR87	Habitats Regulations Assessment (HRA)	Amend the Glossary of Terms to reflect the following. Update to reflect the 2017 Regulations and different regulation numbers. Replace with: "The screening and appropriate assessment of options required under Part 6 and Chapter 8 of The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) is a recognised iterative process which helps determine the likely significant effect on a plan or programme and (where appropriate) assess adverse impacts on the integrity of a European site. The assessment is required to be undertaken by	To reflect updated regulation.	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
		a competent authority in respect of plans or projects which are likely to have a significant effect (alone and in combination with other plans and projects) on a “European Site” (see paragraph 5.1.2 of TAN5) The UK is bound by the terms of the EC Birds and Habitats Directives and the Ramsar Convention. The Conservation (Natural Habitats &c.) Regulations 1994 (the Habitats Regulations) and the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007 refer to “European sites” and “European Offshore Marine Sites”.		
SAR88	The Welsh National Marine Plan	Amend the Glossary to include the following: The Welsh National Marine Plan (WNMP) 2019 prepared and adopted under the Marine and Coastal Access Act 2009.	In the interests of clarity and to reflect updated regulation	None – this has no perceived implication for the HRA.
SAR89	South West Wales Area Statement	Addition of South West Wales Area Statement (2020) into the glossary, with the following text: ‘One of the 7 area statements produced in Wales by NRW as a collaborative response to the Natural Resources Policy (NRP), published by the Welsh Government in 2017, which sets out the key challenges and opportunities for the sustainable management of Wales’ natural resources into the future.’	In the interests of clarity and to reflect updated regulation	None – this has no perceived implication for the HRA.
Appendix 1: Context – Legislative and National Planning Policy Guidance				
SAR90	New Addition	Addition of South West Wales Area Statement to Appendix 1 (Regional)	In the interests of clarity and to reflect new regulation	None – this has no perceived implication for the HRA.
SAR91	New Addition	Addition of Welsh National Marine Plan (WNMP) 2019 to Appendix 1 (National)	In the interests of clarity and to reflect new legislation	None – this has no perceived implication for the HRA.
SAR92	New Addition	Addition of Regional Technical Statement (RTS) for the South Wales Regional Aggregate Working Party 2nd Review 2020	In the interests of clarity and to reflect new guidance	None – this has no perceived implication for the HRA.

SAR	Subject	Description	Reason	Implication
SAR93	New Addition	Addition of Commercial Property: Market Analysis and Potential Interventions: A report to the Welsh Government, March 2020	In the interests of clarity and to reflect new guidance	None – this has no perceived implication for the HRA.
Appendix 2: Regional and Local Strategic Context (several updates in addition to the example provided below)				
SAR94	New Addition	Add the following new sentence at the end of the paragraph “Report and Recommendations of the Carmarthenshire Rural Affairs Task Group paragraph” (Local Context Section). “Reference is made to the ‘Moving Rural Carmarthenshire Forward’ Report (June 2019). The final report was approved at Full Council on the 11 September 2019 and is available on the Council’s website.”	In the interests of clarity and to reflect the corporate context in which the Plan is prepared.	None – this has no perceived implication for the HRA.
SAR95	New Addition	Add the below new text within the Local Context Section beneath the section reviewing the Modernising Education Programme (MEP) to read as follows: “The importance of the Welsh language in the social fabric of the County’s communities is reflected in its significance at a corporate level within the Council. Of particular note in this regard are: 1 Welsh in Education Strategic Plan 2017-2020; 2 Welsh Language Standards (Welsh Language (Wales) Measure 2011) Compliance Notice (issue date 30/9/2015) and the Welsh Language Standards Action Plan (2020/2021); and 3 The Welsh Language Promotion Strategy 2016-2021. All of these documents can be viewed on the Council’s website.”	In the interests of clarity and to reflect the corporate context in which the Plan is prepared.	None – this has no perceived implication for the HRA.
Appendix 3: Supplementary Planning Guidance				
SAR96	SPG	List of SPG to be amended to reflect changes in the dates of preparation. Addition of CCH3, CCH4, VE3, PSD12 SPG.	To reflect the changes in the rLDP timetable and the need to review timings of their preparation.	None – this has no perceived implication for the HRA. NB: SPG CCH4 relates to phosphate mitigation.
Appendix 6: Policy Assessment				

SAR	Subject	Description	Reason	Implication
SAR97	As above appendix	Policy Assessment updated to reflect the amendments made to the monitoring and implementation framework.	Contextual update.	None – this has no perceived implication for the HRA.
Appendix 7: Housing Trajectory				
SAR98	As above appendix	Housing Trajectory updated to reflect the amendments made to the proposed site allocations.	Please see SAR24.	Please see SAR24.
Appendix 8: Permitted Waste Management Sites				
SAR99	As above appendix	Register of Permitted Waste Management Sites Table updated.	Contextual update.	None – this has no perceived implication for the HRA.

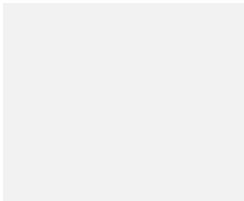
Appendix C: Phosphate Assessment Appendix

Habitats Regulations Assessment to inform the assessment of the Carmarthenshire Local Development Plan

Draft Phosphate Assessment Appendix to the rLDP HRA
Addendum

FEBRUARY 2023

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Habitats Regulations Assessment to inform the assessment of the Carmarthenshire Local Development Plan

Draft Phosphate Assessment Appendix to the rLDP HRA Addendum

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This report dated 08 February 2023 has been prepared for Carmarthenshire County Council (the "Client") in accordance with the terms and conditions of appointment dated 19 May 2022 (the "Appointment") between the Client and Arcadis Consulting (UK) Limited ("Arcadis") for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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1 Introduction

1.1 Background

This Habitats Regulations Assessment (HRA) Phosphate Assessment Appendix has been prepared by Arcadis Consulting (UK) Limited (Arcadis) on behalf of Carmarthenshire County Council (CCC) as part of their review of the Carmarthenshire revised Local Development Plan 2018-2033 (hereafter referred to as the 'rLDP'). The rLDP is a land-use plan which outlines the location and quantity of development within Carmarthenshire for a 15-year period between 2018 and 2033, and will replace the existing adopted LDP. This HRA Appendix, alongside the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033, are required to address the new Natural Resources Wales (NRW) policies with regards to phosphorus standards and associated planning advice. Issues concerning water quality in terms of phosphate reduction have been addressed separately to other Substantive Amendment Reference (SARs) due to their potential significance. Aspects beyond phosphate reduction are addressed in the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033.

In January 2021, Natural Resources Wales (NRW) published evidence¹ following a review of tighter standards set by the Joint Nature Conservation Committee (JNCC) which showed that over 60% of riverine Special Areas of Conservation (SAC) waterbodies fail against revised phosphorus standards. As a result of these failures, NRW has subsequently issued planning advice² to avoid further deterioration in environmental capacity where new developments can affect phosphorus sensitive river SAC to demonstrate the compliance with the Habitats and Species Regulations 2017, as amended (Habitats Regulations). Therefore, this NRW 'advice' relates to all riverine SACs whose drainage catchments extend into Carmarthenshire, namely, the Afon Teifi, Afon Tywi, Afon Cleddau, River Wye and River Usk.

Carmarthenshire County Council (CCC), as the Local Planning Authority (LPA) is required to have regard to this advice given by NRW when making planning decisions on individual developments and Local Development Plans (LDPs). As a result, the new advice passed from NRW with respect to phosphorus within Welsh Riverine SACs effectively paused the progression of CCC's revised LDP (rLDP) to its adoption stage.

As a result, this Appendix, rescreens the rLDP with regards to the potential for their Site Allocations to impact upon SACs and sets out the proposed avoidance mitigation to prevent any additional input into SACs.

This also considers the potential in-combination effects of the Local Development Plans of bordering counties and the agricultural and other inputs from the wider environment.

1.2 Previous LDP HRA

For the original Local Development Plan HRA submitted in November 2019³ the following seven SACs were initially scoped in for further screening with regards to water quality:

Table 1 - SAC screening justification

SAC	Justification	Source
Afon Teifi	Various flora and fauna are at risk from high phosphate loads, such as the Atlantic Salmon: "Among toxic pollutants,	Core Management Plan including Conservation

¹ Natural Resources Wales (January 2021) [Tighter phosphate targets change our view of the state of Welsh rivers](#) [Accessed 08/02/2023]

² Natural Resources Wales [Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#). [Accessed 08/02/2023]

³ [Habitat Regulations Assessment.pdf \(gov.wales\)](#) [Accessed 03/01/2023]

SAC	Justification	Source
	<p>sheep dip and silage effluent present a particular threat to aquatic animals in this predominantly rural area. Contamination by synthetic pyrethroid sheep dips, which are extremely toxic to aquatic invertebrates, has a devastating impact on invertebrate populations and can deprive fish populations of food over large stretches of river. These impacts can arise if recently dipped sheep are allowed access to a stream or hard standing area, which drains into a watercourse. Pollution from organophosphate sheep dips and silage effluent can be very damaging locally. Pollution from slurry and other agricultural and industrial chemicals, including fuels, can kill all forms of aquatic life.”</p> <p>“NRW water quality monitoring (2004 data, quoted in Burgess et al.) has indicated elevated phosphate levels in Llyn Teifi and Llyn Egnant, but only a marginal increase in Llyn Hir. Significantly elevated phosphate levels may have a negative impact on the <i>Littorelletea</i> feature, and contribute to the absence of some macrophyte species, particularly those that are sensitive to nutrient enrichment; for example, this may have contributed to the absence of water lobelia from Llyn Egnant (Burgess et al.). Possible reasons for these elevated nutrient levels include enrichment from livestock dung (sheep) and sediment inputs from stock-mediated soil erosion exacerbated by sheep trampling around the shores.”</p>	Objectives for Afon Teifi/River Teifi SAC ⁴
Afon Tywi	<p>“Discharges put pressure on water quality during a drought as lower than normal river flows mean that there is less water available to dilute discharges such as final effluent from STW. A drought option may exacerbate these low flows and contribute to a reduction in water quality, with potentially detrimental impacts on sensitive features in the impacted reach. Discharges impacting the oxygen balance and ammonia concentration (to support fish and macroinvertebrates, where these are identified as sensitive features) and soluble reactive phosphorus (SRP) concentration (to support macrophytes and algae, where these are identified as sensitive features) in the river have been reviewed.”</p>	Dŵr Cymru Welsh Water Environmental Assessment of Afon Tywi Drought Order (8201-3) ⁵
Cleddau Rivers	<p>“Among toxic pollutants, sheep dip and silage effluent present a particular threat to aquatic animals in this predominantly rural area, especially in the head waters of</p>	Core Management Plan including Conservation Objectives for Afonydd

⁴ <https://naturalresources.wales/media/682845/afon-teifi-river-teifi-management-plan.pdf> [Accessed 03/01/2023]

⁵ <https://www.google.co.uk/url?sa=i&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=0CAQQw7AJahcKEwio3-CFubD8AhUAAAAAHQAAAAAQAg&url=https%3A%2F%2Fwww.dwrcymru.com%2F-%2Fmedia%2FProject%2FFiles%2FPage-Documents%2FCorporate%2FEnvironment%2FWater-Resources%2FDraft-Drought-Plan-2020%2FEnvironment-Assessment-Reports%2FAppendix-22---8201-3-Afon-Tywi.ashx&psig=AOvVaw1J5EdkdAnxbUEkRBhiZ54u&ust=1673008647564017> [Accessed 03/01/2023]

SAC	Justification	Source
	<p>the Eastern Cleddau. Contamination by synthetic pyrethroid sheep dips, which are extremely toxic to aquatic invertebrates, has a devastating impact on crayfish populations and can deprive fish populations of food over large stretches of river. These impacts can arise if recently dipped sheep are allowed access to a stream or hard standing area, which drains into a watercourse. Pollution from organophosphate sheep dips and silage effluent can be very damaging locally.”</p> <p>“Pollution from slurry and other agricultural and industrial chemicals, including fuels, can kill all forms of aquatic life. All sheep dips and silage, fuel and chemical storage areas should be sited away from watercourses or bunded to contain leakage.”</p> <p>“Agricultural sources may be one source for increased levels of nitrates and phosphates within the rivers, and may also increase the levels of sediment within the river system. Pesticides and herbicides that leach into the river can also cause pollution problems.”</p>	<p>Cleddau/Cleddau Rivers SAC (Special Areas of Conservation)⁶</p>
Cardigan Bay	<p>“The limited marine monitoring undertaken in Cardigan Bay has found the water quality to be good however sediment analysis has found significant levels of contaminants at several locations in the bay.”</p> <p>“The majority of the consented discharges to the SAC are of domestic sewage effluent with a few being from an industrial source. However, diffuse run off and effluent from agricultural land and the continuing impact from historic mining activity (metals) provide the major landward inputs in central Cardigan Bay. The scale and significance of contaminant input from outside the site, via the movement of marine waters and sediments or the movement of marine organisms (e.g. dolphin prey), is not known.”</p>	<p>Cardigan Bay European Marine Site: Advice provided by the Countryside Council for Wales in Fulfilment of Regulation 33 of the Conservation (Natural Habitats, &c.) Regulations 1994⁷</p>
Carmarthen Bay and Estuaries	<p>“Available nitrogen and phosphorus levels are in excess of the criterion indicating hypereutrophication in the upper estuary which has been linked to high numbers of algal cells and chlorophyll a concentrations. In addition, there have been inputs of heavy metals from industry and redundant coalmines in the estuaries. Inputs of fine sediments from rivers into all of the estuaries are small, compared to other sources of material (inward migration from the sea). This is reflected in the character of the estuaries and the habitats within them.”</p>	<p>Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd European Marine Site: Advice provided by the Countryside Council for Wales in Fulfilment of Regulation 33 of the Conservation (Natural</p>

⁶ <https://naturalresources.wales/media/670822/Afonydd%20Cleddau%20plan%20English.pdf> [Accessed 03/01/2023]

⁷ <https://naturalresources.wales/media/673505/Cardigan%20Bay%20R33%20Feb%202009.pdf> [Accessed 03/01/2023]

SAC	Justification	Source
		Habitats, &c.) Regulations 1994 ⁸
Cernydd Carmel	<p>For various flora, fauna and areas of bog, nutrient loading was highlighted as potentially having a negative impact: “Good water quality is essential to the ecological integrity of the turlough. Increased nutrient levels in particular could be detrimental to the characteristic flora and fauna of the turlough.”</p> <p>Similarly for species in raised bogs: “Key species (notably peat-forming Sphagna) are highly susceptible to increases in nutrient levels, either from run-off from the surrounding agricultural land or through atmospheric deposition”.</p>	Core Management Plan including Conservation Objectives for Cernydd Carmel SAC (Special Area of Conservation) ⁹
Pembrokeshire Marine	<p>In the Pembrokeshire Marine Action Plan, in order to ensure that maintenance procedures consider and reduce the impacts of SAC features, one of the action plans includes: “Where cleaning agents are necessary, consider only using non-chlorinated products without phosphate.”</p> <p>This is in addition to noting how the importance of changes to grazing may impact nutrient loading, including organophosphate.</p>	Pembrokeshire Marine Special Area of Conservation Management Scheme ¹⁰

However, these assessments, with regards to water quality, were pending further information from NRW. Under Regulation 63 of the Habitats Regulations, NRW are responsible for ensuring that potential effects from treated wastewater on European Designated sites are considered as part of a Review of all existing Consents (RoC). Under the RoC, discharge consents and water abstraction licences are required to have been considered to ensure that there were no detrimental impacts on the conservation interests in designated sites a result of these consents.

In the original HRA it was determined that “*The final HRA of the LDP deposit plan will need to seek clarification from both NRW and DCWW over the potential capacity within the current post RoC discharge consent limits for further growth. Where allocations can be accommodated within the post-RoC discharge consent limits, it can be considered that there will be no likely significant effects on European Designated sites. If the allocated development might exceed available permitted capacity, then a new or modified permit is likely to be required at the waste water treatment works in question to provide for the increased demand, and the HRA would need to consider whether it would be feasible for such additional capacity to be provided without any adverse effects on the integrity of any European Sites.*”

1.3 NRW Phosphorus Compliance Exercise

However, there are two issues with reliance on the above approach. Firstly, not all consents include Total Phosphorus (TP) limits. Secondly, in January 2021, NRW published evidence following a review of tighter water quality standards set by the Joint Nature Conservation Committee (JNCC). NRW undertook a

⁸ [Carmarthen Bay R33 Advice February 2009.pdf \(naturalresources.wales\)](#) [Accessed 03/01/2023]

⁹ <https://naturalresources.wales/media/671239/Cernydd%20Carmel%20SAC%20Management%20Plan.pdf> [Accessed 03/01/2023]

¹⁰ <https://www.pembrokeshiremarinesac.org.uk/wp-content/uploads/2022/04/PMSAC-agreed-ManScheme-2008.pdf> [Accessed 03/01/2023]

Phosphorus compliance exercise for Special Areas of Conservation (SACs)¹¹. Phosphorus concentration data were extracted from the NRW water quality database for a three-year period from January 2017 to December 2019 for all sample points within water bodies in the nine SACs designated for one or more river features. These were:

- Afon Eden – Cors Goch Trawsfynydd
- Afon Gwyrfai a Llyn Cwellyn
- Afon Teifi
- Afon Tywi
- Afonydd Cleddau
- Meirionnydd Oakwoods and Bat Sites (the Afon Glaslyn)
- River Dee & Bala Lake
- River Usk
- River Wye

The monitoring data published in 2021 has shown that over 60% of riverine SAC waterbodies in Wales fail against revised phosphorus standards. New targets have been set by the Joint Nature Conservation Committee (JNCC), which require phosphorus discharges to be lower than current levels. Due to these failures, NRW has issued planning advice¹² to prevent further deterioration in environmental capacity where new developments can impact river SACs in terms of phosphorus and thus demonstrate the compliance with the Conservation of Habitats and Species Regulations 2017, as amended (known as the Habs Regs).

This planning advice included the re-screening of all developments and LDPs with regards to water quality and phosphates.

1.4 Revised Local Development Plan

The emerging revised Local Development Plan (rLDP) is a land-use plan that sets out the planning requirements for achieving sustainable development in the Carmarthenshire County over the period 2018-2033. The Plan identifies where and how much new development will take place, as well as which areas need to be protected for their environmental qualities.

The Carmarthenshire revised Local Development Plan 2018-2033 is currently under examination, due to the outstanding issue of phosphorus levels in the Special Areas of Conservation (SACs) within Carmarthenshire. The staged progression of the plan will be fully informed by the Interim Action Plan (IAP)¹³ that sets out in detail the nutrient assessments that have informed this assessment. The current indicative timeline for this is presented in Table 1, but this will require further iteration in tandem with the IAP's progression. It is envisaged that phosphorus reduction mitigating action will be completed in phases where some allocation sites are being prioritized, based on the recommendations of the IAP.

The relevant Legislation and Planning context can be found in the IAP.

¹¹ <https://cdn.cyfoethnaturiol.cymru/media/693025/compliance-assessment-of-welsh-sacs-against-phosphorus-targets-final-v10.pdf?mode=pad&rnd=132557227300000000> [Accessed 14/12/2022]

¹² Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation

¹³ Final Interim Action Plan (IAP) (February 2023)

Table 2 - Indicative timetable for Key Stages of the rLDP¹⁴

Stage in Plan Preparation	Regulation Number	Timescale
Definitive		
Key Stage 1 – Delivery Agreement	5-10	Initial DA - February 2018 to July 2018 First Revised DA – publication following WG approval, November 2020 Second Revised DA – publication following WG approval, August 2022
Key Stage 2 - Pre-Deposit – Preparation and Participation	14	February 2018 – February 2020
Key Stage 3 - Pre-Deposit – Public Consultation	15,16, 16A	May 2018 – May 2019
Key Stage 4 – First Deposit Revised LDP	17-21	January 2019 – January 2021
Key Stage 4 – Second Deposit Revised LDP	17-21	March 2022 – July 2023
Indicative		
Key Stage 5- Submission of LDP to WG for Examination	22	August 2023
Key Stage 6 – Independent Examination	23	August 2023 – June 2024
Key Stage 7 – Publication of Inspector’s Report	24	August 2024
Key Stage 8 – Adoption	25, 25A	October – November 2024
Key Stage 9 – Monitoring and Review	37	Continued following adoption

¹⁴ Revised Carmarthenshire Local Development Plan 2018 – 2033

2 Screening Approach

2.1 Introduction

In addition to the rescreening of all SACs with regards to potential impacts from phosphorus, this HRA Appendix includes the screening of Substantive Amendment References (SARs) of note introduced into the rLDP that are relevant to the impacts of phosphates on water quality. The SARs that are included in this report refer to changes to wording of relevant policies that include phosphates, as well as updates to the site allocation screening process for areas that may contribute to the Total Phosphate (TP) for the affected SACs. The full list of SARs are assessed in the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033.

2.2 Habitats Regulations Assessment SAC Rescreening

2.2.1 Stages in HRA

All lower-tier plans and projects that have the potential to impact upon National Site Network Sites and/or Ramsar sites (regardless of their proximity to these sites) are required to comply with the Conservation of Habitats and Species Regulations 2017, as amended (known as the Habs Regs)¹⁵. The requirements of the Habs Regs comprise four distinct stages:

1. **Stage 1: Screening** is the process which initially identifies the likely impacts upon a National Site Network Site of a project or plan, either alone or in-combination with other projects or plans and considers whether these impacts may have a significant effect on the integrity of the site's qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made. The April 2018 CJEU judgement determined that mitigation to avoid or reduce harmful effects of the plan or project on a National Site Network Site cannot be taken into account at the screening stage (Stage 1). Where such measures are required, a plan or project will require Appropriate Assessment to be undertaken (Stage 2).
2. **Stage 2: Appropriate Assessment** is the detailed consideration of the impact on the integrity of the National Site Network Site of the project or plan, either alone or in-combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
3. **Stage 3: Assessment of alternative solutions** is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the National Site Network Site, should avoidance or mitigation measures be unable to cancel out adverse effects.
4. **Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain.** At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the National Site Network Site.

Development should be refused where there are adverse impacts on the features for which a site has been designated. International and national responsibilities and obligations for conservation should be fully met, and, consistent with the objectives of the designation, statutorily designated sites protected from damage and

¹⁵ Available at: <https://www.legislation.gov.uk/ukxi/2017/1012/contents/made> [Accessed 11/11/2021]

deterioration, with their important features conserved and enhanced by appropriate management. Further information on Habitats Regulations Assessment is contained in TAN 5: Nature Conservation and Planning.' It is nevertheless important that this HRA of the WTS identifies the types of potential impacts which could arise from policy implementation, and how these could be avoided/mitigated at a later stage (i.e. 'flagging up' potential issues at an early stage), as well as providing the high-level policy reassurance that future National Transport Delivery Plans, LDPs and developers will follow the necessary process to identify and assess potential implications for National Site Network Sites/Ramsar sites when allocating land for development. The subsequent LDP-level, or even project-level HRAs will need to take into consideration the potential impacts identified in this HRA to guide their policy development and ensure that mitigation measures can be delivered, where potential for adverse effects are identified. It is important to note that this is how the iterative HRA process ensures that plans and projects cannot be consented or implemented without first ensuring that they would not have an adverse effect upon the integrity of the National Site Network Sites and Ramsar sites.

2.2.2 In-combination Effects

It is necessary for HRA to consider in-combination effects with other projects or plans.

Where an aspect of a project could have some effect on the qualifying feature(s) of a National Site Network Site, but the effects of that aspect of the project alone would not be significant, the effects will need to be checked in-combination, firstly with other effects of the same project, and then with the effects of any other plans and projects.

If the prospect of cumulative effects cannot be eliminated, it is necessary to consider how the addition of effects from other projects or plans may produce a combined adverse effect on a National Site Network Site that would be significant. Taking the effects which would not be likely to be significant alone, it is necessary to make a judgement as to whether these effects would be made more likely or more significant if the effects of other projects or plans are added to them. Most cumulative effects can be identified by way of the following characteristics. Could additional effects be cumulative because they would:

- Increase the effects on the qualifying features in an additive, or synergistic way?
- Increase the sensitivity or vulnerability of the qualifying features of the site affected by the project proposals?
- Be felt more intensely by the same qualifying features over the same area (a layering effect), or by the same qualifying feature over a greater (larger) area (a spreading effect), or by affecting new areas of the same qualifying feature (a scattering effect)?

In accordance with David Tyldesley Associates (DTA) Publications Limited, *The Habitats Regulations Assessment Handbook* (DTA Publications Limited, 2016), it will be necessary to look for projects and plans at the following stages:

- a. Applications lodged but not yet determined.
Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration.
Refusals subject to appeal procedures and not yet determined.
Projects authorised but not yet started.
- b. Projects started but not yet completed.
- c. Known projects that do not require external authorisation.
- d. Proposals in adopted plans.
- e. Proposals in finalised draft plans formally published or submitted for final consultation, examination or adoption.

Plans under consideration may range from neighbouring authorities' planning documents down to sector-specific strategic plans on such topics as flood risk.

A review has been undertaken of projects and plans with the potential for an in-combination effect with the proposed development.

2.2.3 Definition of Significant Effects

A critical part of the HRA screening process is determining whether or not the proposals are likely to have a significant effect on National Site Network Sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance and also its conservation objectives. A useful definition of 'likely' significant effects is as follows:

'...likely means readily foreseeable not merely a fanciful possibility; significant means not trivial or inconsequential but an effect that is potentially relevant to the site's conservation objectives' (Welsh Assembly Government, 2006).

In considering whether the project is likely to have a significant effect on a National Site Network Site, a precautionary approach must be adopted, particularly where features are assessed as being in unfavourable condition and critical loads are being exceeded.

- The project should be considered 'likely' to have such an effect if the applicant is unable (on the basis of objective information) to exclude the possibility that the project could have significant effects on any National Site Network Site, either alone or in-combination with other plans or projects.
- An effect will be 'significant' in this context if it could undermine the site's conservation objectives. The assessment of that risk must be made in the light of factors such as the characteristics and specific environmental conditions of the National Site Network Site in question.

2.2.4 Approach to the HRA Report

This HRA Report takes into account the requirements of the Habitats Regulations and relevant guidance produced by DTA Publications Limited, 2016.

This report is an Appendix to the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033 due to be available for public consultation in February 2023, which was prepared to consider the impacts of the Carmarthenshire revised Local Development Plan 2018-2033 on National Site Network Sites, as required under the Conservation of Habitats and Species Regulations 2017, as amended (known as the Habs Regs)¹⁶.

The purpose of this assessment is to:

1. Ensure that all Substantive Amendment References (SARs) which have occurred since the First Deposit rLDP are considered in terms of their implications upon the HRA process with regards to phosphate impacts on water quality. All potential effects of the rLDP alone and in-combination were screened out in the previous iteration of the HRA published in 2019; and
2. Take account of the NRW policy position on phosphates in rivers (May 2021), and subsequent advice to planning authorities¹⁷. This includes potential impacts from Carmarthenshire Site allocations and any other developments within the Zone of Influence.

This Appendix should be read and interpreted alongside the Submission HRA document, the rLDP, and the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033 which also considers the effects of the SARs on the rLDP.

¹⁶ Available at: <https://www.legislation.gov.uk/ukxi/2017/1012/contents/made> [Accessed 11/11/2021]

¹⁷ Available at: <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en> [Accessed 16/11/2021]

The complete list of SARs in terms of policy screening are assessed in the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033, which screen in or out each strategic and specific plan policy. However, this report will consider the changes related to phosphate only.

2.3 Substantive Amendment References

2.3.1 Substantive Amendment References

Substantive Amendment References (SARs) are the main changes to the rLDP. Where potential HRA implications were identified they were screened for their potential to affect water quality with regards to phosphates. They comprise changes of varying substance which relate to policy wordings, explanatory text and proposals maps which the Council considers necessary to demonstrate the soundness of the LDP.

The majority of the SARs are minor editing changes which do not affect the meaning or implementation of a policy and sets out amendments to the rLDP to take into account Planning Policy Wales – Edition 11. The SARs in this report are centred upon phosphates only. The full list of SARs are available in the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033 which concerns changes beyond those that impact phosphates. SARs that have been screened out with regards to phosphate, have not been considered further within this report.

2.3.2 Policy SARs

For this HRA Appendix, the only policy that was relevant to potential phosphate impacts was CCH4: Water Quality and Protection of Water Resources. These changes were implemented to ensure clarity in relation to NRW's phosphate guidance. Additionally, the policy amendments included a change in policy number from CCH3: Water Quality and Protection of Water Resources to its current name CCH4: Water Quality and Protection of Water Resources.

2.3.3 Site Allocation SARs

The Site Allocation SARs as presented in the rLDP have been through an initial screening to remove those allocations with the largest potential impact with regards to phosphate. Therefore, the SARs screening has been undertaken in two stages:

1. Screening of Site Allocations from the LDP to remove those with the potential for the greatest impact with regards to phosphate to remove these from the rLDP; and
2. Screening of the remaining Site Allocations, with differing potential phosphate input parameters, to confirm the requirement for the preparation of information for Appropriate Assessment.

3 Screening Water Quality with Regards to Phosphorus

3.1 SAC Rescreening

The Riverine SACs whose catchments extend into the zone of influence of Carmarthenshire, are the Afon Teifi, Afon Tywi, Afon Cleddau, River Wye, and River Usk.

Of these five waterbodies, an assessment was initially undertaken to screen the riverine SACs and identify those whose drainage from Carmarthenshire Site Allocations would extend into the SAC's catchments. Only two waterbodies were screened in as having the potential to be impacted by the Carmarthenshire LDP Site Allocations.

They are the Afon Teifi and Afon Tywi. Out of these two SAC waterbodies, only the Afon Teifi is currently failing to meet the new targets. Its failures are mostly in the "low" category, which is less than 10ug/l in exceedance of their targets, which largely range from 20 to 30 ug/l P.

According to the NRW review of Welsh Riverine SACs, the Tywi is shown to pass comfortably against its Phosphorus targets. However, there is a requirement to consider the effects of the increased amount of phosphorus generated from the proposed site allocations on both SAC waterbodies. This increased amount of phosphorus is required both from the rLDP and in-combination with other potential developments.

3.2 Potentially Affected SACs

3.2.1 Afon Teifi

The Afon Teifi in west Wales is a large river flowing over hard rock, with some spectacular gorges in the lower section. It is mainly mesotrophic but also has oligotrophic sections in the upper reaches and represents an outstanding example of a sub-type 3 river with water-crowfoot *Ranunculus* vegetation in western Britain. It is designated as a SAC for the following features:

- Annex I habitats that are a primary reason for selection of this site 3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation
- Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site 3130 Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea*
- Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site 3130 Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea*
- Annex II species that are a primary reason for selection of this site:
 - 1096 Brook lamprey *Lampetra planeri* The Teifi is a predominantly mesotrophic river in west Wales supporting a large population of brook lamprey *Lampetra planeri*. A mixture of habitat and substrate types provides the combination of spawning gravels adjacent to silt beds that are favoured by this and other lamprey species. A large number of tributaries have been included in the SAC; these are thought to be important for lampreys in the Teifi because the main channel is prone to severe floods that may result in washout of smaller ammocoetes.
 - 1099 River lamprey *Lampetra fluviatilis* The Teifi is a large catchment of high conservation value in west Wales. It contains a healthy population of river lamprey *Lampetra fluviatilis*. The semi-natural channel containing a mixture of substrates and in-stream features provides excellent habitat for juvenile lampreys.

- 1106 Atlantic salmon *Salmo salar* The Teifi is a medium-sized mesotrophic river system in west Wales. In 1999 the salmon *Salmo salar* rod catch in the Teifi was the third-largest in Wales, and the system has not experienced the steep decline in stock numbers seen in many other rivers in the area. This is likely to reflect the high quality of the catchment, with a semi-natural channel largely unaffected by poor water quality or artificial barriers to migration. However, in common with many other Welsh rivers, acidification in the upper reaches is a cause for concern. In common with many other rivers in west Wales, grilse are the main stock component. There is a small traditional coracle fishery that exploits the salmon and sea trout *Salmo trutta trutta*.
 - 1163 Bullhead *Cottus gobio* The Teifi represents bullhead *Cottus gobio* in west Wales. Water quality is generally good, and the diversity of semi-natural habitat and predominance of stony substrates provides excellent bullhead habitat throughout much of the catchment. Environment Agency electrofishing data shows this species to be widespread throughout the system. Bullheads show marked differences in growth and longevity between upland and lowland streams, and the Teifi includes sections representing both types of habitat.
 - 1355 Otter *Lutra lutra* The Teifi in west Wales holds otter *Lutra lutra* throughout much of its catchment. The river has suitable resting and breeding sites along its length. Evidence from surveys and sightings suggest the tidal reach is being increasingly used by otters.
 - 1831 Floating water-plantain *Luronium natans* The Teifi is a mixed habitat supporting floating water-plantain *Luronium natans* at the western margins of its range in the UK. This species has been recorded in the nutrient-poor standing waters of the Teifi pools in the headwaters of the river. It has also been recorded in a moderately nutrient-rich stretch of the river immediately downstream of Cors Caron.
- Annex II species present as a qualifying feature, but not a primary reason for site selection
 - 1095 Sea lamprey *Petromyzon marinus*

Prevention of diffuse pollution from the principal source that is agriculture is one of the conservation objectives of the SAC¹⁸.

3.2.2 Afon Tywi

The Afon Tywi is one of the longest rivers flowing entirely within Wales. Its total length is 120 km. It weaves its way from its source in the Cambrian Mountains above Llyn Brianne reservoir to the sea at Carmarthen Bay. It has been designated for the following features:

- Annex II species that are a primary reason for selection of this site:
 - 1103 Twaite shad *Alosa fallax* A large spawning population of twaite shad *Alosa fallax* occurs in the Tywi, south Wales, and is considered to be self-sustaining. Spawning sites occur throughout the lower reaches of the river between Carmarthen and Llangadog, with most spawning occurring downstream of Llandeilo. Water quality and quantity are considered adequate to maintain this internationally vulnerable species, and there are no impassable obstructions along the migration route, though one weir at Manorafon may be an obstacle during low flow conditions. The presence of Llyn Brianne reservoir at the headwaters provides the potential to manipulate river flows to aid shad migration.
 - 1355 Otter *Lutra lutra* The Afon Tywi is one of the best rivers in Wales for otters *Lutra lutra*. There are abundant signs of otters and they are regularly seen on the river. The water quality is generally good and there is an ample supply of food. There are suitable lying-up areas along the river bank, but there few known breeding sites on the main river, although cubs have been seen.
- Annex II species present as a qualifying feature, but not a primary reason for site selection:
 - 1095 Sea lamprey *Petromyzon marinus*

¹⁸ CONSERVATION OBJECTIVES FOR N2K SITES (llangoedmorcc.org.uk)

- 1096 Brook lamprey *Lampetra planeri*
- 1099 River lamprey *Lampetra fluviatilis*
- 1102 Allis shad *Alosa alosa*
- 1163 Bullhead *Cottus gobio*

3.3 Consultation

NRW have been contacted with regards to our Phosphate nutrient budgeting approach for use within the HRA¹⁹. The following illustrate some of the publicly available advice for LDPs and HRAs, in addition to some consultation between NRW and Arcadis with regards to P limits.

3.3.1 Advice for the review of local development plans (LDPs) (from NRW website²⁰)

“All LDPs should be screened to determine whether any policies are likely to have a significant effect on a river SAC.

Policies can be screened out as not likely to have a significant effect in relation to increased phosphorus loading if there are no pathways for increased phosphorus impacts.

Any LDP policies relating to schemes for private sewage treatment systems should ensure no adverse effects on the integrity of any river SACs where:

- *discharges are direct to surface waters; or*
- *discharges are to ground and do not meet the screening criteria set out in this document.*

Allocations for development that are proposed to be connected to a mains WwTW and have the potential to increase phosphorus loading, should be assessed in accordance with advice set out earlier in this document.”

Allocations where capacity for additional wastewater is planned:

“Where the treatment works does not currently have capacity to treat additional wastewater from new connections, but improvements are planned under the Asset Management Plan (AMP), the Planning Authority should undertake an Appropriate Assessment. The Assessment should consider the technical review of extant environmental permits against the revised phosphorus targets where available, to be certain that there will be no adverse effect on site integrity. A conclusion of no adverse effect on site integrity from water quality impacts can only be made where future improvements or enhancements within the AMP are certain at the time of Appropriate Assessment and will be in place and operational when the proposed development will become active.”

Allocations where there is no capacity for additional wastewater:

“Where a development is proposed with connection to a public sewer but the associated wastewater treatment works has insufficient capacity to accommodate additional phosphorus from new connections or no improvements to increase treatment capacity of phosphorus is planned within the AMP programme, the Planning Authority should undertake an Appropriate Assessment of the proposals. The Appropriate Assessment should consider any other mitigation, nutrient neutrality, or avoidance measures.”

3.3.2 HRA-Phosphorus Specific Advice (from NRW website)

Under the Habitats Regulations, Planning Authorities have to take into consideration the effect of phosphorus from the proposed developments on water quality within SACs. For catchments that do not meet the phosphorus targets:

¹⁹ Arcadis 2022: Appendix E in the IAP

²⁰ [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#) [Accessed 05/01/2023]

“...it is possible that new developments can be authorised if it can be demonstrated they will not lead to further deterioration of water quality in the SAC water bodies failing to meet water quality targets and will not undermine the ability for the SAC to meet its conservation objectives.”

“This may be achieved if:

- developments are not a source of phosphorus or
- developments are a source of phosphorus but there is no pathway for it to enter the SAC river environment or
- measures associated with a given development are put in place so that nutrient neutrality can be achieved and that development does not lead to a net increase in phosphorus entering the SAC river environment.”

“In SAC catchments meeting phosphorus targets, it is possible that new developments can be authorised if it can be demonstrated they will not lead to an adverse effect on site integrity (i.e. will not undermine the ability for the SAC to meet its conservation objectives).”

3.4 Phosphorus Compliance Failures

NRW published a ‘Compliance Assessment of Welsh River SACs against phosphorus targets’ report²¹, which set new targets for phosphates with regards to SACs. Out of 107 water bodies that were assessed, 39% passed the new targets and 61% failed. One of the failing water bodies included the Afon Teifi, with a low to medium magnitude of failures for the water bodies within the SAC (Table 3). In contrast, the Afon Tywi’s annual mean phosphorus was less than that of the targets set out by NRW, hence this SAC was assessed as passing the phosphorus requirements. However, it is important to note that for one of the waterbody sample points (31612) for the Afon Tywi, there was no data available (Table 4). This was due to the data quantity and detection limit being inadequate to assess the uppermost water body. For the full consultation on phosphorus compliance failures, refer to Appendix E in the Interim Action Plan²².

Table 3 - Sensitivity Testing for Failing Water Bodies on the Afon Teifi SAC

Waterbody ID	Waterbody Name	Sample Point	Target (µg l ⁻¹)	Median (µg l ⁻¹)	Annual Mean (µg l ⁻¹)	Outlier (µg l ⁻¹)	Mean (Outlier Excluded) (µg l ⁻¹)	BOD / N / NH ₃ confirm outlier	Failure Type
GB110062043563	Teifi - Afon Ceri to estuary	34401	20	20	20	55	19	<Q1 (N); >Q3 (BOD, NH ₃)	Episodic
GB110062039110	Ceri - Dulas to conf Teifi	34486	40	36	42	151	38	Outlier (BOD, NH ₃); <Q1 (N)	Episodic
GB110062039190	Ceri - headwaters to conf Dulas	34585	30	24	28	-	-	-	Episodic
GB110062039220	Clettwr - headwaters to confluence with Teifi	83009	30	25	32	119	28	>Q3 (N); Outlier (NH ₃)	Episodic
GB110062043490	Groes - headwaters to confluence with Teifi	89118	10	2	14	205	3	No	Episodic
GB110062039041	Cych - headwaters to confluence with Teifi	34488	20	15	25	187	19	Outlier (BOD, NH ₃)	Episodic

²¹ Available at: <https://naturalresources.wales/evidence-and-data/research-and-reports/water-reports/compliance-assessment-of-welsh-river-sacs-against-phosphorus-targets/?lang=en> [Accessed 19/12/2022]

²² Final Interim Action Plan (IAP) (February 2023)

Table 4 - Phosphorus compliance for Afon Tywi SAC

Waterbody ID	Waterbody Name	Sample Point	Target ($\mu\text{g l}^{-1}$)	N Samples	Annual Mean ($\mu\text{g l}^{-1}$)	Growing Season Mean ($\mu\text{g l}^{-1}$)	Assessment
GB110060029290	Tywi - confluence with Cothi to spring tidal limit	31601	21	31	10	9	Pass
GB110060036350	Tywi - conf with Doethie to conf with Llandovery Bran	31612	13	-	-	-	Not Assessed
GB110060036250	Tywi (Llandovery Bran to Cothi conf)	31616	20	30	13	13	Pass

Although this NRW assessment did not look at potential sources of phosphates, the relatively limited scale and extent of these failures suggested that it may be possible to tackle these issues in a relatively targeted way with relevant stakeholders without the need for large-scale investment. It is also recommended by NRW in the compliance assessment report that actions be taken to increase the resilience of the river habitat to nutrient pressures. New targets have been set across the catchment ranging for phosphorus (P) from 10 to 40 $\mu\text{g l}^{-1}$.

As per NRW advice to planning authorities guidance²³, for SAC catchments failing to meet phosphorus targets, new developments can be authorised if it can be demonstrated they will not lead to further deterioration of water quality in the SAC water bodies failing to meet water quality targets and will not undermine the ability for the SAC to meet its conservation objectives.

Due to increasing diffuse pollution from agricultural sources the Afon Teifi is particularly vulnerable to changes in water quality due to the requirements of its vegetation features. Maintenance of appropriate phosphate levels is likely to require catchment wide measures to control diffuse pollution from agriculture as the principal source of phosphates²⁴.

Therefore, the additional input from new overnight accommodation within the rLPD would increase the exceedances for the Afon Teifi and potentially cause exceedances in the Afon Tywi. To determine the magnitude of the additional P, nutrient budgets were calculated for the potential additional Phosphate loads due to the rLDP Site Allocations.

3.5 Water Quality Phosphates Re-Screening

Policies and allocations previously screened out due to their lack of construction pathway or due to their likely scale and distance from the Afon Teifi and Afon Tywi SACs, have been screened in for further consideration where this includes occupation that could contribute to phosphates entering into the sewage system. NRW provided detailed advice as to the nature of that screening process detailed in the sections below.

3.5.1 Policy Screening

With regard to Policies, NRW advised that “Policies can be screened out as not likely to have a significant effect in relation to increased phosphorus loading if there are no pathways for increased phosphorus impacts.” This resulted in only one policy being screened in that was firstly, relevant to phosphates, and secondly, had undergone SARs.

The rLDP Policy CCH4 was identified as the only policy that was relevant to phosphates and their impact upon water quality, hence any changes that were made to the policy are explored in section 4.2. Changes to

²³ [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#) [Accessed 12/01/2023]

²⁴ [2012 08 07 Afon Teifi River Teifi SAC management plan _ Eng _ \(naturalresources.wales\)](#) [Accessed 12/01/2023]

the policy's wording are presented in Table 10. Any revisions made to other policies are addressed in the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033.

Policy CCH4 has had its name altered from CCH3: Water Quality and Protection of Water Resources due to what was previously policy CCH1 being split into two individual policies. It has also had its policy wording amended in order to improve its clarity and its response in terms of NRW's phosphate guidance. As a result, the supporting text of CCH4 has also been amended to account for the recent update with regard to phosphates and will be discussed further in Section 4.

3.5.2 Nutrient Budgeting

The four stages of the Nutrient Budget Calculator, as shown in Image 1, have been followed in order to calculate the total phosphorus budget that will require mitigation from each of the initial 42 sites identified as impacting an SAC. There is no phosphate limit within the current permitting environment for the wastewater treatment works (WwTW) connected with these SACs. Therefore, parameters were required to be set.

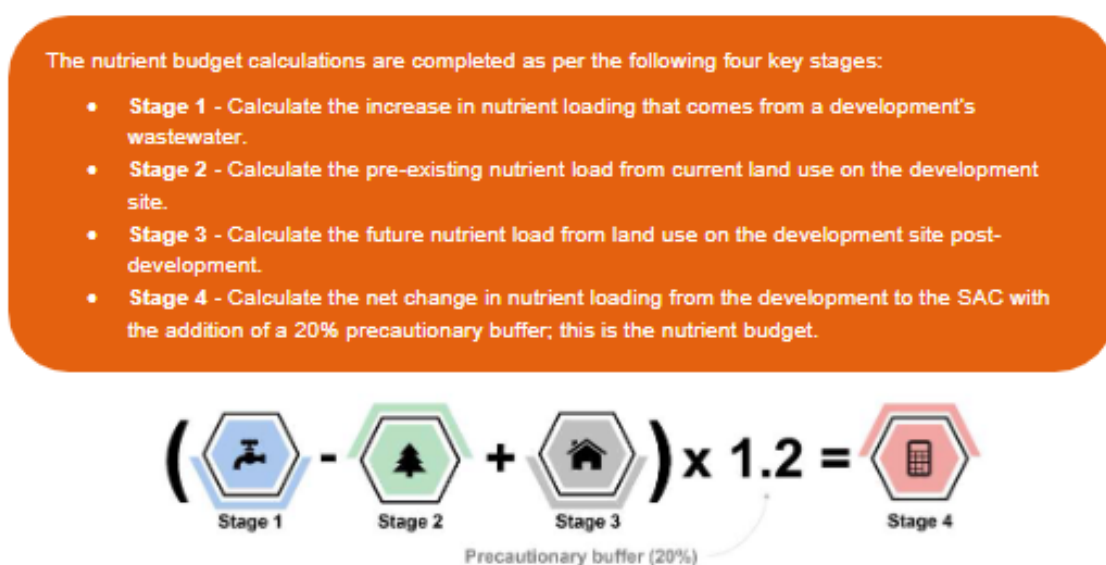


Image 1 - Diagram showing the overall equation used to calculate the nutrient budget

Two stages of nutrient budgeting have been undertaken.

1. An initial overview of 42 Site Allocations using the assumed using the parameter of 8 mg/l of P using the 'Ricardo Nutrient Budget Calculator' spreadsheet and associated guidance from March 2022. Refer to the CCC Technical Note²⁵ for further detail.
2. Following the initial nutrient budgeting which demonstrated those sites with the greatest potential for impact, several Site Allocations were dropped from the rLDP. On review of actual P discharges as per monitoring data²⁶ on the 20th October 2022, NRW confirmed that rather than the total P of 8 mg/l used as a parameter by Arcadis for nutrient budgeting, a total P of 5 mg/l was a suitable P assessment value²⁷.

"It is an appropriate assumption to use the 5 mg/l value where P stripping improvements are not planned or likely to be planned. Note that the modelling process/QA for the Tywi and Teifi is not yet complete and there may be some variation around the backstop limit on a site by site basis (less than 5 mg/l not greater). Of

²⁵ CCC Technical Note (August 2022)

²⁶ CCC Technical Note (August 2022)

²⁷ Arcadis 2022: Appendix E in the IAP

course until the modelling is complete we won't know for sure so your assumption remains valid but having scope to make amendments will be useful.”

3.5.3 Stage 1 Screening Allocation Sites Results

Arcadis found that within the drainage catchments of the Afon Teifi and Afon Tywi, 42 sites were identified as having a potential effect on these SACs:

- 28 in the Afon Teifi; and
- 14 in the Afon Tywi

No sites have been identified affecting the Afon Cleddau or River Wye SACs. Full details of the analysis are presented in Section 4 of the CCC Technical note²⁸. Based on the Total Phosphate (TP) load (using 8mg/l) it was estimated that there would be 486.11 kg TP/year input into the Afon Teifi SAC and 191.17 kg TP/year for the Afon Tywi.

Following this assessment and other strategic considerations, the council planning officers reviewed each individual site within the rLDP with a view to “screening out” sites.

- For the Afon Teifi, the number of site allocations reduced from 28 sites (417 dwellings) down to 15 sites (189 dwellings) presented in Table 5 as the sites screened in.
- For the Afon Tywi, the number of site allocations reduced from 14 sites (175 dwellings) down to 6 sites (102 dwellings) presented in Table 6 as the sites screened in.

The impact of reducing the number of Site Allocations within the rLDP has decreased the Nutrient Budget load by:

- 49% (486.11 TP kg/yr to 236.28 TP kg/yr) for Afon Teifi
- 43% (191.17 TP kg/yr to 109.77 TP kg/yr) for Afon Tywi

Table 5 - Stage 1 rLDP Site Allocations removed/added for the Afon Teifi SAC as provided by CCC

Allocations	Description (No. of Dwellings)	Potential Impact pathway	rLDP in/out
SeC12/h1	17	Drains into phosphorus sensitive catchment - Teifi	In
SeC12/h2	14	Drains into phosphorus sensitive catchment - Teifi	Out
SeC12/h3	20	Drains into phosphorus sensitive catchment - Teifi	In
SeC13/h1	10	Drains into phosphorus sensitive catchment - Teifi	In
SeC13/h2	30	Drains into phosphorus sensitive catchment - Teifi	Out
SeC13/h3	23	Drains into phosphorus sensitive catchment - Teifi	Out
Sec13/h4 (New Site W39176)	9	Drains into phosphorus sensitive catchment - Teifi	Out
SeC14/h1	20	Drains into phosphorus sensitive catchment - Teifi	In
SeC14/h2	24	Drains into phosphorus sensitive catchment - Teifi	In

²⁸ CCC Technical Note (August 2022)

Allocations	Description (No. of Dwellings)	Potential Impact pathway	rLDP in/out
SeC14/h3	28	Drains into phosphorus sensitive catchment - Teifi	Out
SeC14/h4	7	Drains into phosphorus sensitive catchment - Teifi	Out
SuV31/h1	12	Drains into phosphorus sensitive catchment - Teifi	Out
SuV31/h2	10	Drains into phosphorus sensitive catchment - Teifi	Out
SuV32/h1	6	Drains into phosphorus sensitive catchment - Teifi	Out
SuV33/h1	5	Drains into phosphorus sensitive catchment - Teifi	In
SuV34/h1	14	Drains into phosphorus sensitive catchment - Teifi	Out
SuV35/h1	6	Drains into phosphorus sensitive catchment - Teifi	In
SuV36/h1	6	Drains into phosphorus sensitive catchment - Teifi	In
SuV36/h2	16	Drains into phosphorus sensitive catchment - Teifi	In
SuV37/h1	20	Drains into phosphorus sensitive catchment - Teifi	Out
SuV37/h2	20	Drains into phosphorus sensitive catchment - Teifi	In
SuV37/h3	10	Drains into phosphorus sensitive catchment - Teifi	In
SuV38/h1	6	Drains into phosphorus sensitive catchment - Teifi	In
SuV38/h2	5	Drains into phosphorus sensitive catchment - Teifi	Out
SuV39/h1	7	Drains into phosphorus sensitive catchment - Teifi	In
SuV41/h1	19	Drains into phosphorus sensitive catchment - Teifi	Out
SuV41/h2 (New Site W40639)	14	Drains into phosphorus sensitive catchment - Teifi	In
SuV43/h1	8	Drains into phosphorus sensitive catchment - Teifi	In

Table 6 - Stage 1 rLDP Site Allocations removed/added for the Afon Tywi SAC as provided by CCC

Allocations	Description (No. of Dwellings)	Potential Impact pathway	rLDP in/out
SuV15/h1	10	Drains into phosphorus sensitive catchment - Tywi	Out
SuV16/h1	8	Drains into phosphorus sensitive catchment - Tywi	Out
SuV17/h1	35	Drains into phosphorus sensitive catchment - Tywi	In
SuV18/h1	15	Drains into phosphorus sensitive catchment - Tywi	Out

Allocations	Description (No. of Dwellings)	Potential Impact pathway	rLDP in/out
SeC15/h1	12	Drains into phosphorus sensitive catchment - Tywi	Out
SeC15/h2	8	Drains into phosphorus sensitive catchment - Tywi	In
SeC16/h1	27	Drains into phosphorus sensitive catchment - Tywi	In
SeC16/h2	5	Drains into phosphorus sensitive catchment - Tywi	Out
SeC16/h3	5	Drains into phosphorus sensitive catchment - Tywi	Out
SeC17/h1	16	Drains into phosphorus sensitive catchment - Tywi	In
SeC17/h2	8	Drains into phosphorus sensitive catchment - Tywi	In
SuV47/h1	7	Drains into phosphorus sensitive catchment - Tywi	Out
SuV48/h1	18	Drains into phosphorus sensitive catchment - Tywi	Out
SuV51/h1	8	Drains into phosphorus sensitive catchment - Tywi	In

This resulted in a final Site Allocation for the rLDP as follows.

Table 7 - Sites screened in

Site Reference	SAC
SeC12/h1	Afon Teifi
SeC12/h3	Afon Teifi
SeC13/h1	Afon Teifi
SeC14/h1	Afon Teifi
SeC14/h2	Afon Teifi
SuV33/h1	Afon Teifi
SuV35/h1	Afon Teifi
SuV36/h1	Afon Teifi
SuV36/h2	Afon Teifi
SuV37/h2	Afon Teifi
SuV37/h3	Afon Teifi
SuV38/h1	Afon Teifi
SuV39/h1	Afon Teifi

Site Reference	SAC
SuV41/h2 (New Site W40639)	Afon Teifi
SuV43/h1	Afon Teifi
SuV17/h1	Afon Tywi
SeC15/h2	Afon Tywi
SeC16/h1	Afon Tywi
SeC17/h1	Afon Tywi
SeC17/h2	Afon Tywi
SuV51/h1	Afon Tywi

3.5.4 Stage 2 Screening Allocation Sites Results

The TP Budget load calculations for Stage 1 were made using an 8mg/l TP limit for all the existing DCWW wastewater treatment (WwTWs) in Ricardo's nutrient budget calculator. CCC assumed this value in the absence of TP permitting vales for these WwTWs with the aim of being precautionary. Therefore, initial consultation with DCWW was undertaken by Arcadis in July 2022 to clarify the current TP limit consents position and any performance data available for each of the relevant WwTWs. The P performance for the last 12 months (Table 8) showed that each of the WwTWs in the assessment were performing well below the assumed 8mg/l TP limit.

Table 8 - WwTW current P performance

WwTW	Current P performance – last 12 months (mg/l)	Current P performance – 2022 (mg/l)
Cwrt Henri	No Data	No Data
Pont-ar gothi & Nantgaredig	1.2	1.3
Adpar	4.8	1.7
Llanybydder Llanybyther	2	2.2
Pencader	1.6	1.5
Drefach/Felindre	1.6	1.4
Pentrecwrt	3.5	3.1
Lampeter	2.9	1.5
Capel Iwan	2.7	2.1
Llanfihangel-ar-arth	No Data	No Data
Llandysul	2.2	2.7
Llandovery	2.6	3.2
Ffairfach	3	3
Llangadog	1.9	2.4
Talley	No Data	No Data
Cwrt Henri	No Data	No Data

Based on the current performance above, and on further consultation with DCWW²⁹, and with NRW and DCWW, a rescreening of the Site Allocations carried forward was undertaken based on a lower estimated value of 5 mg/l value for all the existing WwTWS, (including Adpar and Lampeter which currently sit just outside of the CCC boundary).

The impact of reducing the estimated discharge value associated with Site Allocations within the rLDP has further decreased the Nutrient Budget load by:

- 37% (236.28 kg TP/yr to 149.39 kg TP/yr) for the Afon Teifi
- 34% (109.77 kg TP/yr to 72.75 kg TP/yr) for the Afon Tywi

3.6 In-combination effects

A review was undertaken of neighbouring Councils LDPs for the potential for their Site Allocations to affect the Teifi and Tywi SACs. The only LDPs SAs with the potential to affect any of these SAC catchments were those in Ceredigion and Pembrokeshire and with respect to the Teifi SAC.

The western reaches of the Brecon Beacons National Park (BBNP) are located within Carmarthenshire's borders, although the assessed rLDP is not applicable to this area (~230 km²) as it is under the responsibility of another LPA. While preparation works were started in 2017, the BBNP Authority had to pause the production of its revised LDP. At time publication, no updated delivery agreement is available and the current LDP remains in force. From the information available online (adopted Local Plan, proposals, inset maps and supporting documents), there are no proposed allocations which would be within the boundary of the County nor within the shared Tywi P sensitive SAC catchment and, therefore, an in-combination assessment is not required.

3.6.1 Ceredigion Local Development Plan

The river Teifi flows through large areas of Ceredigion (its river catchment area includes 44.6% of Ceredigion and includes Tregaron, Lampeter and Llandysul) and the new planning guidance issued by NRW in relation to dealing with phosphate levels in River Refi SAC would significantly impact how these communities would develop during the next LDP period 2018-2033 (i.e., LDP2).

Based on the latest NRW planning guidance and evidence base, there is significant risk of the LDP2 being considered 'unsound' through the public examination process and not fit for purpose, due to the phosphate issue being unaddressed. Therefore, at a Full Council held virtually on 21 October 2021, Ceredigion County Councillors agreed a pragmatic decision needed to be reached and agreed to a temporary but as yet unspecified length pause for the replacement LDP to allow essential evidence and data to be gathered and mitigation options to be devised. In the meantime, Ceredigion County Council is working with Natural Resources Wales, Dŵr Cymru Welsh Water, Welsh Government and neighbouring Local Authorities to find both national and local solutions to the issue.

Although the current adopted LDPs plan period ends in 2022, it will continue to be the Development Plan for Ceredigion until a Replacement Plan is adopted. Therefore, those currently allocated LDP sites that are yet to be fully developed have been included in the nutrient budgets undertaken by Arcadis in this Phosphate Assessment Appendix to the Carmarthenshire rLDP HRA to quantify the in combination impacts on the river Teifi SAC.

3.6.2 Pembrokeshire Local Development Plan

River Teifi flows through a part of Pembrokeshire and therefore being impacted by the new NRW planning guidance for dealing with phosphate levels as with Carmarthenshire and Pembrokeshire.

²⁹ Arcadis 2022: Appendix E in the IAP

Therefore, this has implications on the location and sites, which can be included as allocations in Pembrokeshire County Council Local Development Plan Review (LDP 2). Pembrokeshire County Council will not be in a position to know which sites can be retained in LDP2 until further information is received and additional research is undertaken. Further time is therefore required to allow essential evidence and data to be gathered and mitigation options on the phosphates issue to be devised.

In addition to any changes required as a consequence of the phosphates issue, Pembrokeshire County Council is likely to wish to make a range of other changes to the Deposit Plan of 2020 (covering the period 2017- 33) in response to consultation feedback and as a result of updated evidence / changes to national policy and context, including those required as a consequence of Covid-19.

Therefore, at a Full Council, held virtually on 9th December 2021, Pembrokeshire County Councillors agreed to note delays to the LDP 2 timetable and approved a recommendation to allow an amended Delivery Agreement to be prepared which includes a return to the Deposit Plan stage. This means that a second Deposit Plan will be published for public consultation in the future. The Timetable is still uncertain as it is dependent on the release of information and outcomes of research. Specific dates for this are therefore not yet identified. A new Delivery Agreement and preparation of a second Deposit Plan will allow essential evidence and data to be gathered and mitigation options to be devised. In the meantime, Pembrokeshire County Council is working with Natural Resources Wales, Dwr Cymru Welsh Water, Welsh Government, neighbouring Local Authorities and other organisations such as the Pembrokeshire Coastal Forum to find both national and local solutions to the issue.

The current adopted LDP's plan end date of 2021 has been disregarded, so that it will continue to be the Development Plan for Pembrokeshire until a Replacement Plan is adopted. Therefore, those site allocations that were considered in the Deposit Plan of 2020 have been included in the nutrient budgets undertaken by Arcadis in this HRA to quantify the in combination impacts on the river Teifi SAC.

3.6.3 Nutrient Budget Estimates

A high-level assessment of the remaining Ceredigion Site Allocations that are yet to be developed from their currently adopted LDP and proposed site allocations from Pembrokeshire Deposit Plan of 2020 was conducted, using the information provided to Arcadis from the respective county councils.

The estimated nutrient budgets including the Carmarthenshire summary are included in Table 9 below. Further detail and greater granularity of these assessments will be taken forward in the next iteration of the IAP.

These values present the TP that is required for avoidance mitigation to ensure that the rLDP does not alone, or in combination adversely affect the Teifi or Tywi SAC.

Table 9 - Nutrient budget calculation TP totals from the rLDP for Carmarthenshire and for Ceredigion, and Pembrokeshire LDPs

County Council Area	Scenario 1: Default P Performance Limit, as per Carmarthenshire Calculator (8 mg/l)		Scenario 2: Assumed P Limit (5 mg/l)	
	Teifi TP load to be removed (kg TP/year)	Tywi TP load to be removed (kg TP/year)	Teifi TP load to be removed (kg TP/year)	Tywi TP load to be removed (kg TP/year)
Carmarthenshire	236.28	109.77	149.39	72.75
Ceredigion	754.67	-	537.35	-
Pembrokeshire	63.77	-	41.63	-

Total	1054.72	109.77	728.37	72.75
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4 Appropriate Assessment

4.1 Approach to incorporation of further avoidance measures to a plan

4.1.1 Overview

In order to deliver the rLDP with confidence that alone and in-combination with other plans there would be no increase in the amount of P entering the Carmarthenshire catchment, the IAP³⁰ was produced to examine the requirements and avoidance measures across the catchment produced in collaboration with CCC.

To summarise, the screening process for this report is as follows:

- Policy CCH4 has been screened in for further assessment;
- The Total Phosphate (TP) and Site Allocations that require mitigation for the rLDP have been brought forward are presented in Table 9 of this report.
- The Total Phosphate that requires mitigation has been presented for the in-combination sites screened in has been presented in Table 9.

The IAP discusses the potential sources of phosphate, not only from the respective LDPs, but from diffuse pollution from wider catchment sources. It also provides a range of potential solutions to the overall reduction of TP.

There are potential solutions with traditional WwTW, associated with water utilities upgrades, however these may not be available in time to permit the adoption and approval of the rLDP. Therefore, the efficiencies of nature-based solutions (NbS) have been incorporated into the nutrient budgeting and these have been explored as mitigation measures.

Nutrient budgeting for the LDP inputs were assessed to provide an indication as to the level of NbS solutions required. By demonstrating the existing opportunities for the LDP and wider phosphate mitigation.

4.1.2 Case law

Case law has established some important principles in respect of the reliance on mitigation measures as part of the HRA of a plan (as opposed to a HRA of a project). In the case of a project, it is necessary to have the details of proposed mitigation measures clearly established before being able to rely on them to conclude that a project will have no likely significant effect, or no adverse effect on integrity. However, in line with the strategic nature of a plan, it is necessary to outline an overall framework within which later projects can be successfully delivered without requiring abnormal derogations from compliance with existing legislation.

As set out in section C.5.1. of the HRA Handbook³¹, as a general principle for both plans and projects:

“all ‘mitigation measures’ should be effective, reliable, timely, guaranteed to be delivered and as long-term as they need to be to achieve their objectives. Any doubt about the effective, reliability, timing, deliver or duration of mitigation measures, should be addressed by the competent authority before relying on such measures during the appropriate assessment and integrity test stages”.

The effect of the Dutch nitrogen case (Case C293/17 and C 294) ruling³² provides that the expected benefits of mitigation measures should be certain at the time of assessment. However, this ruling should be considered

³⁰ Final Interim Action Plan (IAP) (February 2023)

³¹ Available at: <https://www.dtapublications.co.uk/> [Accessed 16/11/2021]

³² Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62017CA0293> [Accessed 16/11/2021]

in conjunction with the standards of certainty established by earlier Waddenzee ruling³³, when ascertaining ‘no adverse effect on the integrity’ of a site. In particular, whilst the ‘expected benefits’ of mitigation measures should be certain ‘at the time of the assessment’, taken together with what is known of the impacts, overall, the standard that remains to be met is that there remains no reasonable scientific doubt as to adverse effects on the integrity of the site.

With specific reference to the HRA of a plan, case law has established that it is acceptable in principle to include policies within a Local Plan which are **conditional** upon certain **conditions** being met. In the case of Feeney v Oxford City Council³⁴, in respect of the assessment of land use plans under the Habitats Regulations, the use of a ‘**safeguard**’ relating specifically to a particular policy within the Core Strategy was subject to considerable scrutiny. The High Court ruled that:

“There is nothing wrong in approving something in principle which may not happen in the future, if the condition is not satisfied (para 96)...

The conditional approval is a permissible and lawful course of action (para 99)”

In support of this premise, an approach which potentially relies upon matters being finalised after the adoption of the plan was specifically endorsed by the High Court in the case of Abbotskerswell v Teignbridge (2014)³⁵. In this case, the Inspector:

“did not consider that safeguards proposed in the plan – the strategic mitigation strategy, settlement and site mitigation plans – had to be in place in advance of adoption of the Local Plan”.

The Court ruled in para 84 that *“the Inspector was entitled to conclude that the Local Plan met the statutory requirements and was sound”.*

In addition, a nutrient neutrality approach has been subject to scrutiny in the High court in the case of Wyatt v Fareham BC³⁶.

The Wyatt case also explored the issue of certainty and ruled that the presence of uncertainty can be addressed by ruling out the possibility of relevant harm to a high standard, thereby removing any reasonable scientific doubt. Paragraph 105 states:

‘By requiring the competent authority effectively to rule out, to a very high standard, the possibility of relevant harm, the requirement under both articles 6(2) and (3) of the Habitats Directive is fully satisfied.’

In the Wyatt case this was achieved by including a sufficient level of precaution (namely underestimating the effectiveness of mitigation measures) to counterbalance the uncertainties, and this approach was endorsed by the ruling. It is important to note that the uncertainty in this case did not concern uncertainty about whether proposed measures would be effective, rather uncertainty in how otherwise robust mitigation measures might be quantified and applied in a strategic manner.

This case is discussed further in section 4.3.

Finally, in the case of NANT v Suffolk Coastal District Council (2015)³⁷, the Court of Appeal ruled that:

“the important question in a case such as this is not whether mitigation measures were considered at the stage of CS [Core Strategy] in as much detail as the available information permitted, but whether there was

³³ Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62002CJ0127&from=EN> [Accessed 16/11/2021]

³⁴ Available at:

<http://pages.wiltshire.gov.uk/corestrategydocument?directory=Sustainability%20Appraisal%20and%20Habitat%20Regulation%20Assessment&fileref=31> [Accessed 16/11/2021]

³⁵ Available at: <https://www.bailii.org/ew/cases/EWHC/Admin/2014/4166.html> [Accessed 16/11/2021]

³⁶ Available at: <https://www.townlegal.com/wp-content/uploads/2021-EWHC-1434-Admin-28-May-2021.pdf> [Accessed 19/11/2021]

³⁷ Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Core-Strategy-and-DMP/No-Adastral-New-Town-Ltd-v-SCDC.pdf> [Accessed 16/11/2021]

sufficient information at that stage to enable the Council to be duly satisfied that the proposed mitigation measures could be achieved in practice”.

Therefore, when considering mitigation measures to inform a plan HRA, the key question is whether there is sufficient information to determine that the proposed mitigation measures **could** be relied upon to prevent an adverse effect to the integrity of National Site Network Sites.

4.1.3 Potential policy amendments and mitigation

The HRA Handbook states that ‘Further mitigation measures that may be introduced during or after the ‘appropriate assessment stage may be case specific policy restrictions or policy caveats.

To be an appropriate restriction or caveat [...], enabling the plan-making body to ascertain no adverse effect on the integrity of a European site, the restriction must be –

- case-specific;
- explicit; and
- added to the policy and not merely added to the explanatory text or commentary, or not merely inserted into the implementation or monitoring chapters.’

Therefore, a combination of strengthened embedded policy and a clear mitigation strategy could be sufficient to demonstrate no adverse effect.

4.2 Policy CCH3 Revision to CCH4

In order for the provisions of CCH3 to continue to serve as mitigation measures for the screened in Site Allocations and other policies, a revision to the wording was necessary to provide for a strategic approach to the delivery of phosphorus reduction measures.

Policy CCH4 has been amended (Table 10) to provide greater clarity of the wording of the policy in regard to National Site Network Sites. The requirement for development not to lead to the potential for adverse effects on the integrity of National Site Network Sites has been made explicit and the requirement for approval of any avoidance mitigation must be agreed with CCC and NRW in advance of any acceptance.

With these changes, CCH4 will act as both a policy caveat and a policy restriction which can be relied upon to avoid adverse effects to site integrity.

Table 10 - Policies Screened in for further consideration

CCH3 LDP	CCH4 rLDP
<p>“Proposals for development will be permitted where they do not compromise or lead to a deterioration in either the water resource or the quality of controlled waters. Proposals will, where appropriate, be expected to contribute towards improvements to water quality.”</p> <p>“Watercourses will be safeguarded through ecological buffer zones or corridors to protect aspects such as riparian habitats and species, water quality, and provide for flood plain capacity. Proposals will be permitted where they do not have an adverse impact on nature conservation, fisheries, public access, or water related recreation use of the rivers in the County.”</p> <p>“Development proposals must make efficient use of water resources and where appropriate, contribute towards improvements to water quality. SuDS must be implemented where appropriate with approval required through the Sustainable Drainage Approval Body (SAB).”</p>	<p>“Development proposals must make efficient use of water resources and, where appropriate, contribute towards improvements in water quality. Proposals will be permitted where they do not have an adverse effect upon water resources, water quality, fisheries, nature conservation, public access, or water related recreation use in the County.</p> <p>“Where appropriate, SuDS must be implemented with approval required through the Sustainable Drainage Approval Body (SAB).</p> <p>Proposals will be supported if they promote the safeguarding of watercourses through ecological buffer zones or corridors, protecting aspects such as riparian habitats and species, water quality, and providing for flood plain capacity.”</p> <p>“Development will only be permitted if it can be demonstrated that there is no adverse effect on</p>

CCH3 LDP	CCH4 rLDP
	<p>the integrity of phosphorus sensitive riverine Special Areas of Conservation (SACs). In the hydrological catchment area designated for riverine SACs, development creating wastewater discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC. This can be achieved through implementation of mitigation measures and associated supplementary planning guidance. Where evidence demonstrates that adverse effects on the integrity of river SAC can be avoided or offset using mitigation, these must be agreed with the Council on a case-by-case basis, in consultation with NRW.”</p>

4.3 Interim Action Plan 2022 (Avoidance Mitigation)

4.3.1 Avoidance approach

The IAP report illustrates the steps required for achieving Phosphorus mitigation within Carmarthenshire whilst the rLDP is brought forward for adoption. The IAP³⁸ sets out the potential routes available to CCC to prevent any negative impacts from Phosphate on the conservation objectives of the relevant SACs from their rLDP appropriately to demonstrate the compliance with Habitats Regulations. This includes a range of NbS that are technically feasible and can reasonably be delivered in relation to the policies and allocations within the rLDP and that it can be demonstrated that these measures can be effective in avoiding additional phosphorous into the Afon Teifi and Afon Tywi.

There are uncertainties that exist in relation to how otherwise robust mitigation measures might be quantified and applied in a strategic manner, with limited information on P reduction quantities available for each mitigation measure. The IAP acknowledges this issue by commenting on the uncertainties of P removal via NbS and by setting an 100% nutrient neutrality target with regards to the Site Allocations.

To ensure that this can be delivered, a joint approach has been undertaken with Pembrokeshire and Ceredigion, and in addition to rLDP sources, wider environmental P sources have been considered within the IAP.

This requires that the IAP contain two distinct categories of measures.

- Category 1 measures – those which allow compliance with the Habitats Regulations and avoid adverse effects from the developments arising from the rLDP allocations.
- Category 2 measures – those that will deliver wider phosphorus reductions across the catchment to increase certainty of success.

A range of interventions have been assessed within the IAP for Carmarthenshire, including NbS Category 1 measures that would be entirely within the control of the Council to deliver. These solutions include those ranging from Sustainable Drainage Solutions (SuDS) to Integrated Buffer Zones (IBZs) of trees and grasslands protecting watercourses, to constructed wetlands. For further information on the interventions assessed, see the IAP document.

³⁸ Final Interim Action Plan (IAP) (February 2023)

Wetlands designed specifically for wastewater treatment have the greatest P removal potential. As such nutrient budgeting mitigation was calculated for these interventions. Image 2 illustrates the indicative wetland requirements based on nutrient budgets for the Afon Teifi and Afon Tywi.

4.3.2 Wetland areas required for P removal – category 1 measures

The average P removal rates from constructed wetlands has been calculated to be 1.2 g m² year⁻¹ for mitigation requirements during this feasibility stage. Therefore, based on the current assumption that a TP permit of 5mg/l is acceptable, a total of 18.51 ha of effective wetland treatment area, split between the Afon Tywi and Afon Teifi, could be implemented to meet Nutrient Neutrality.

This calculation is presented in Image 2. Scenario 1 shows the wetland area required to mitigate P from the rLDP Site Allocations based on the current P performance. Using a precautionary approach, calculation has taken the higher value of the current P performance and the last 12 months P performance and applied a 10% buffer. Scenario 2 applies an even more precautionary approach. For the mitigation proposed for the rLDP a TP limit of 5 mg TP/year to all the existing WwTW's. As discussed previously, this value was suggested by DCWW as a suitable precautionary TP limit for the WwTWs and NRW have confirmed their agreement to this.

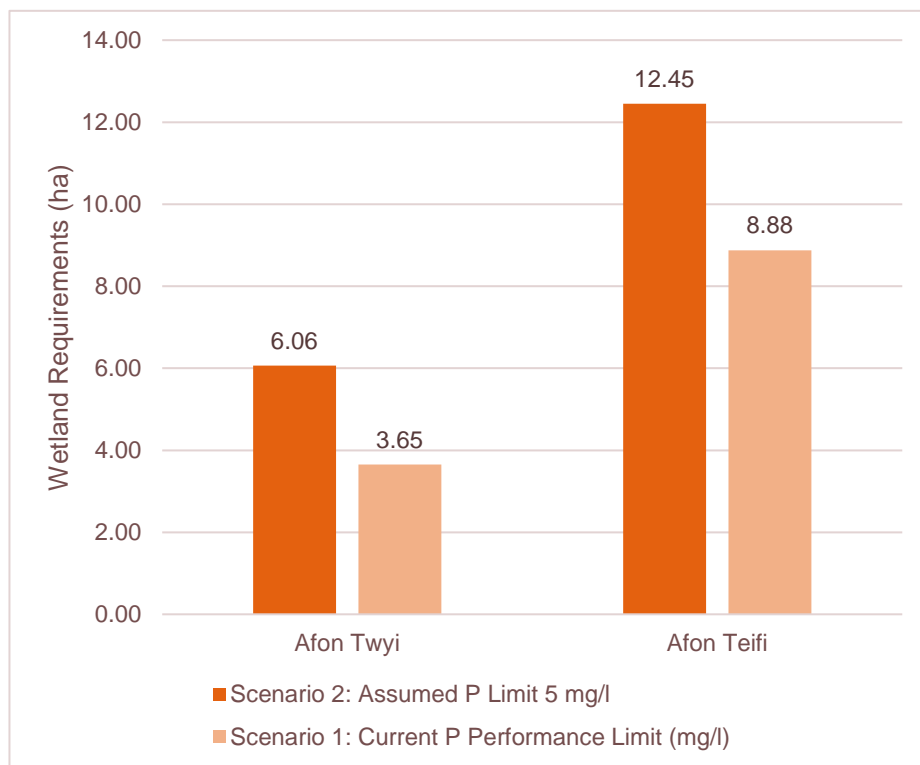


Image 2 - Indicative Wetland area requirements to offset the Nutrient Budget Load

Table 11 - Wetland area required for a Category 1 measures

SAC	TP removal required (kg/yr)	Wetland areas required (effective treatment area ha)	Wetland areas identified (ha)	Effective treatment area identified (ha)	Potential excess effective treatment area identified (resilience locations) (ha)
Teifi	149.39	12.45	36.5*	27.38	14.93
Tywi	72.75	6.06	15*	11.25	5.19
Total	222.14	18.51	51.5*	38.63	20.12

*Only 75% of this is actually effective treatment area as there is a requirement for earth reprofiling and bunds.

4.3.3 Feasibility of wetland delivery

Further analysis of the potential to deliver these mitigations has been undertaken along with a high-level indicative cost (not including land value and detailed design) are presented in Table 12 and Table 13.

Table 12 - Afon Teifi constructed wetland opportunities analysis

Ref	Area (ha)	Landowner	ALC	Flood Zone	Soil Type	Indicative P removal (TP kg/yr)	Indicative Cost
Teifi CW01	5	P ¹	3a	Flood Zone 2/3	Freely Draining	45	£110,000
Teifi CW02	6	P	3b	Flood Zone 2/3	Slowly Permeable	54	£132,000
Teifi CW03	2.5	P	3a/3b/4	Flood Zone 2/3	Freely Draining	22.5	£55,000
Teifi CW04	3	P	5	Flood Zone 1	Slowly Permeable	27	£66,000
Teifi CW05	6	P	3b	Flood Zone 1	Freely Draining	54	£132,000
Teifi CW06	2	P	3a/5 *grade 3a seems unlikely	Flood Zone 1	Slowly Permeable	18	£ 44,000
Teifi CW07	12	P	5	Flood Zone 1	Slowly Permeable	108	£ 264,000
Total	36.5²					328.5	£ 803,000

¹Private Owned land ²Only 75% of this is actually effective treatment area as there is a requirement for earth reprofiling and bunds. Effective Treatment Area = 27.4 ha removing TP 328.5 kg/yr.

Table 13 - Afon Tywi constructed wetland opportunities analysis

Ref	Area (ha)	Landowner	ALC	Flood Zone	Soil Type	Indicative P removal (TP kg/yr)	Indicative Cost
Tywi CW01	8	C ¹	3b	Flood Zone 1	Slowly Permeable	72	£ 176,000
Tywi CW02a	7	C	3a	Flood Zone 2/3	Freely Draining	63	£ 154,000
Tywi CW02b	7	C	3b	Flood Zone 1	Freely Draining	63	£ 154,000
Total	15²					135	£ 330,000

¹Council Owned land Only 75% of this is actually effective treatment area as there is a requirement for earth reprofiling and bunds. Effective Treatment Area = 11.25ha removing TP 135 kg/yr.

Table 11 demonstrates that there is an excess of available mitigation areas to deliver the required phosphate reductions using NbS. This allows the resilience required for the subsequent feasibility and detailed design of schemes to be taken forward to provide confidence in the ability to deliver the required mitigation.

The TP budgeted will also be phased over many years. That is, not all of the developments will be operational at once. Therefore, it is not necessary for 100% of the P mitigation to be available prior to rLDP determination.

4.3.4 Development Phasing

Table 14 below presents the timeline of when the projected number of housing units per annum from the rLDP will be brought forward. The phasing of the creation of wetlands may be able to be aligned with when these housing units are brought forward however this is to be confirmed at a later stage.

Table 14 - Timeline of projected housing units from the rLDP to be constructed annually

Key stakeholders / items	Year											
	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
rLDP no of housing units to be constructed per annum: Teifi	4	6	19	19	27	36	38	30	17	12	0	0
rLDP no of housing units to be constructed per annum: Tywi	4	7	5	5	14	56	54	27	2	5	3	2

Further analyses and evolution of the IAP will detail the TP required to be mitigate as per these phases.

4.3.5 Wetland areas required for P removal – category 2 measures

The IAP³⁹ also sets out how developer contributions could be used to provide a strategic approach to mitigation that facilitates the delivery of new development within the catchments, removes existing pressures and opportunities to attain mitigation funding to reduce wider environmental pressures.

For the Afon Teifi which is currently failing in terms of NRW's P targets (see Table 3), model results from the Phosphorus Source Apportionment Draft Summary suggest that 45 kg of phosphorus is discharged from the

³⁹ Final Interim Action Plan (IAP) (February 2023)

catchment daily, with 67% of the average daily load (kg/d) being from sewage treatment works (STW). Rural land use contributes 28% of the daily P load, storm overflows contribute 3%, and a further 1% is due to other sources such as septic tanks and urban run-off. This implies that P load in the Afon Teifi is driven by STW, however the modelling process has not yet been finalised, so these values are subject to change until the modelling process for the Teifi and Tywi is complete.

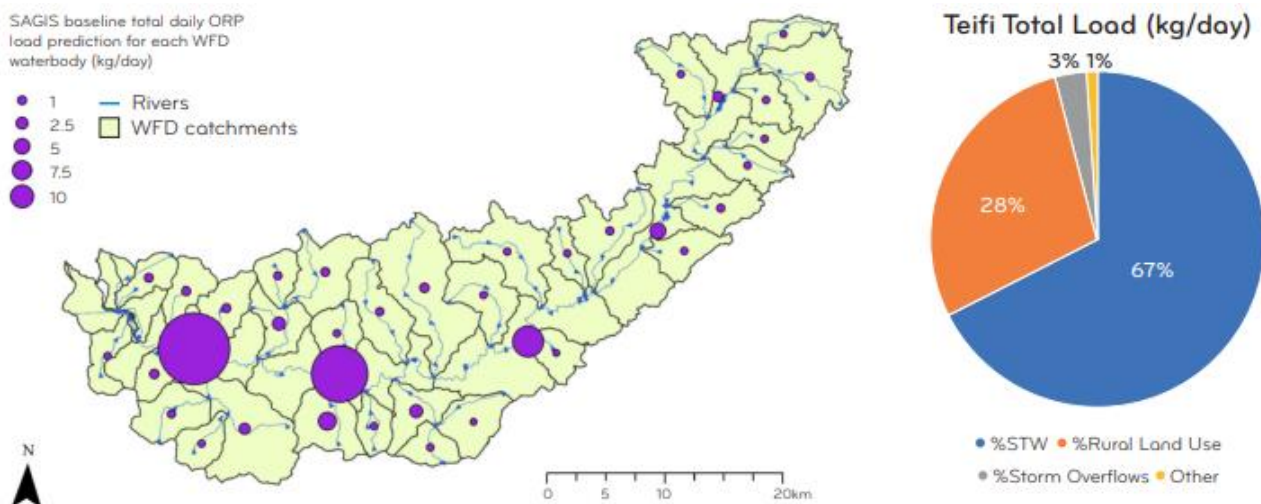


Image 3 - Phosphorus apportionment by source⁴⁰

Category 2 measures are therefore necessary to support confidence that the delivery of Category 1 measures will be effective in an environment with excess P and will not undermine the achievement of the conservation objectives and corresponding duties under Article 6(1) and 6(2). Box 4.1 shows an example of an assessment of Category 2 measures as taken from a similar study for the River Dee and Lake Bala SAC from the Dee Catchment Phosphorus Reduction Strategy DCPRS⁴¹, and similar work could be implemented to deliver wider benefits within the Afon Teifi and Afon Tywi catchments. Category 1 measures required and potentially available to mitigation for rLDP SAs with regards to Phosphate are presented in Table 11.

There are a number of policies plans and partners that may be able to support these measures. The IAP outlines these potential solutions for example the Taclo'r Tywi project⁴² run by NRW with a host of delivery partners. The project aims to make improvements to water quality and biodiversity. Working with partners, the aim is to manage all aspects of the environment in a more sustainable way, so the Tywi can continue to support agriculture, forestry, biodiversity, tourism and recreation now and in the future.

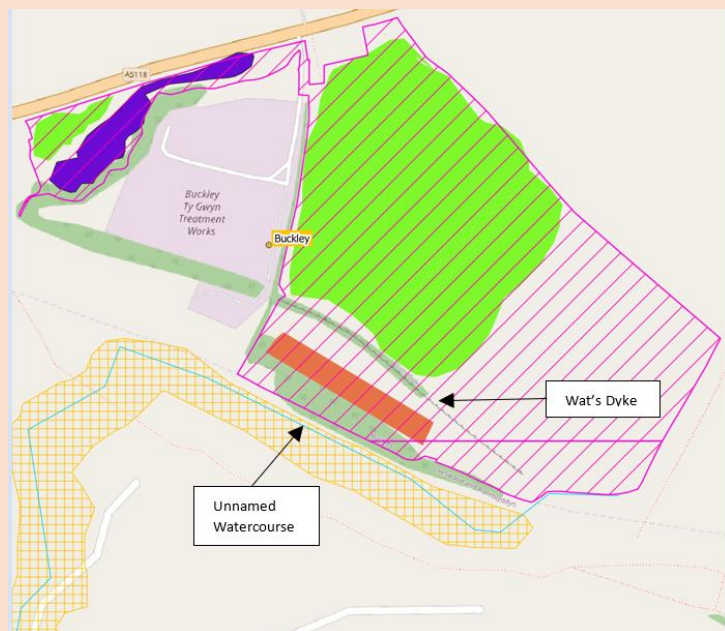
⁴⁰ Phosphorus Source Apportionment Draft Summary: River Teifi (2022)

⁴¹ <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/FCC/FCC031-Phosphate-Strategy.pdf>

⁴² [Natural Resources Wales / Taclo'r Tywi - About the project](#)

Box 4.1: Indicative Category 2 measures assessed in the River Dee catchment - Woodland planting, habitat restoration and fencing

This preliminary assessment investigates the effectiveness of incorporating new woodland planting and habitat restoration areas within Flintshire County Council owned land, adjoining to existing Buckley WwTW. Wat's Dyke also runs through an area of farmland and woodland to the southeast of Buckley WwTW.



The estimated annual rainfall is between 900 and 1200mm. The FARMSCOPER model was first tested to determine the individual effectiveness of proposed woodland planting, habitat restoration and fencing. This showed that woodland planting, habitat restoration and fencing can reduce the annual P load by 17% (from 11.25kg to 9.33kg), 4.4% (from 11.25kg to 10.76kg), and 2.8% (from 11.25kg to 10.93kg) respectively. The fencing test assumed that only 20% of the site was deemed to be fenced off from the watercourses on site, which would stop any livestock South of Wat's Dyke from accessing the dyke or the unnamed watercourse on the southern boundary of the site. This was because it was considered that animals could still access the watercourse (Wat's Dyke) to the north of the fencing area. The model was then run with all three intervention measures in place simultaneously, which showed that they can reduce the annual P load by 20.2% (from 11.25kg to 8.97kg).

The responsibility for delivery and maintenance of the above measures (whether C1 or C2) would be by Flintshire County Council, however there is potential for DCWW adoption. There is also opportunity for riparian planting (yellow) outside the Flintshire County Council owned land along the unnamed watercourse, but this measure was not modelled in this test. Since this is outside the Council owned land it should be treated as a C2 measure, and the delivery and maintenance responsibility would be discussed in liaison with the current landowners and the delivery potential partners discussed in this strategy. The Woodland Investment Grant, Natural Flood Management programme, or one of the other funding opportunities presented etc. (see para 4.518) could provide potential

4.4 In-combination effects

4.4.1 In-combination effects from wider sources

For purpose of clarification, the new development process cannot be held accountable for achieving the wider phosphate targets for which diffuse pollution from agriculture and overflows from STW contribute. However, it is necessary to ensure that the delivery of mitigation measures which serve to create capacity for new development does not prevent or hinder the delivery of wider measures to achieve the phosphate targets for the SAC.

A nutrient neutrality approach has been subject to scrutiny in the High court in the case of Wyatt v Fareham BC⁴³. The Court accepted the principles of a nutrient neutral approach to inform decision-making under Article 6(3), paragraph 42 concludes that

'The authorisation of an individual project which is no more than environmentally neutral is not inimical to the language and intendment of the Habitats Directive and/or the Habitats Regulations'

However, when addressing a complaint that this might hinder the delivery of wider duties under Article 6(2), the endorsement by the Court of a neutrality approach was provided on the assumption that other steps to avoid deterioration were being taken by relevant statutory bodies. The implicit support for a neutrality approach at paragraph 42 was reached on the grounds that Jay J had

'No doubt Natural England and other statutory bodies are taking other steps to avoid further deterioration for the purposes of article 6(2), all of which are outside the scope of this application for judicial review.'

It is therefore considered that in order to rely on a nutrient neutrality approach (through delivery of Category 1 measures) the Council will need to be satisfied that other steps are being taken to avoid deterioration for the purposes of Article 6(2). Hence the recommendation that certainty is provided by considering the inclusion within the IAP of both Category 1 and Category 2 measures thus delivering a surplus of mitigation measures, thereby providing the level of 'certainty' required to conclude no adverse effects on site integrity.

Category 1 measures will be sufficient to achieve nutrient neutrality and avoid adverse effects to site integrity from the Local Plan. Responsibility for securing the delivery of Category 1 measures therefore lies with the Council. The delivery of wider Category 2 measures will provide the necessary assurances that the delivery of development provided for within the Local Plan will not undermine or hinder the achievement of the conservation objectives for the SAC. Delivery of wider Category 2 measures is a shared responsibility across statutory bodies. Ultimate responsibility rests with the Welsh Government but NRW Wales have specific powers associated with improving water quality and their role will be central.

Within the IAP the level of mitigation required has been identified along with the range of existing and potentially new opportunities that could deliver P reductions. This includes a wide range of existing grants and funding options and the existing and proposed strategies of organisations such as those listed in Box 4.2. Further details of potential funding sources can be found in the IAP⁴⁴.

⁴³ <https://www.townlegal.com/wp-content/uploads/2021-EWHC-1434-Admin-28-May-2021.pdf> [Accessed 12/01/2023]

⁴⁴ Final Interim Action Plan (IAP) (February 2023)

Box 4.2: Examples of Funded Organisations Working to Improve Water Quality

Natural Resources Wales:

- **Welsh Government Grant In Aid;** this funding is available to deliver measures in Sites of Special Scientific Interest (SSSI) and Special Areas of Conservation (SAC) in order to move the designated species and habitats closer to ‘favourable’ status. In 2021, this funding was an annual Biodiversity & Ecosystem Fund and from 2022 will become a ‘multiyear’ fund.
- **Welsh Government Strategic Allocated Funding;** provides funding for a five-year plan for the improvement of fish and fish habitat in Wales. This fund is known to be being used in other Welsh catchments to undertake catchment measures which reduce nutrient input to watercourses.
- **European Sustainable Fisheries Funding;** this is available for annual ad-hoc bids for specific projects and includes catchment measures to reduce nutrient input to watercourses.
- **Welsh Government Water Quality Capital Fund;** this is used to fund improvements in water quality such as reducing nutrients for Water Framework Directive (WFD) targets and in 2021, £1.8m was available for such work.

Dwr Cymru / Welsh Water:

- DCWW receive funding via their customer bills through a five-year program called Asset Management Plan. This multi-million-pound funding includes improvements to sewage treatment works and storm overflows resulting in a reduced amount of phosphorus entering the watercourses. The drivers for this can include WFD and Habitats Directive (SAC) targets.
- DCWW have made available the Environment Fund which aims to provide financial support to projects that will benefit and enhance biodiversity at or near DCWW sites. DCWW are also enabling third party funded wetlands whereby effluent at DCWW sewage treatment works is directed to a wetland to garner additional polishing for P removal. Note – this is currently in England only.

4.4.2 In-combination effects from other LDPs

Arcadis are currently considering the sub-set of the Afon Teifi SAC catchment that is situated within Ceredigion and Pembrokeshire with regards to potential sites for wetland creation and therefore P mitigation. There is enough council owned land within the Afon Tywi catchment in Carmarthenshire to offset the additional P estimated to be produced by the proposed developments through the creation of wetlands. However, for the Afon Teifi, although sufficient opportunities have been identified, there is significantly less council owned land available to be used for wetland creation. The differences between the two SACs in terms of the council owned land that they have available is illustrated in further detail in Table 12 and Table 13. Therefore, Arcadis has looked into areas within the wider SAC catchments beyond Carmarthenshire for potential land that could supplement wetland creation to reduce the wider environmental pressures due to the P from other Council’s LDP Site Allocations and from agricultural and SWT inputs.

These potential in-combination site allocations include neighbouring counties and areas through which the Afon Teifi passes through. This includes Ceredigion and Pembrokeshire. On the 15th December 2022, a meeting was held between Arcadis, CCC and Ceredigion County Council, wherein Ceredigion County Council confirmed their interest in supporting wetland creation in their county to help offset TP impacts for the entire catchment, as well as for potential collaboration between the council and Arcadis on the feasibility for their Phosphate Reduction and Mitigation (PRAM) project. Pembrokeshire County Council was not present at this meeting, however their interest in supporting the creation of the additional wetlands has been confirmed.

Table 15 – Summary of in-combination TP nutrient budget and land available for the Afon Teifi

Teifi SAC	TP removal required (kg/yr)	TP removal delivered (kg/yr)	Wetland areas required (ha)	Wetland Areas Identified (ha)	Potential excess/deficit TP	Potential excess/deficit (ha)
Ceredigion	537.35	TBC	55.97**	868 TBC	TBC	TBC
Pembrokeshire	41.63	TBC	4.34**	TBC	TBC	TBC
Total	578.98	TBC	60.31**	868 TBC	TBC	TBC

** These values are drafts relating to the effective wetland treatment area required and will be updated as the assumptions underlying the calculations are confirmed

For the potential in-combination effects it is the Teifi SAC that requires additional mitigation required to demonstrate nutrient neutrality, Ceredigion County Council provided a GIS layer of County Farms in Teifi SAC which has a total of 868 ha across the catchment. There is potential for this land to be used as mitigation for any potential in-combination effects.

The approximate total area of required wetland is:

- 55.97 ha for Ceredigion
- 4.34 ha for Pembrokeshire

A current P reduction project that will be taking place in the portion of the Afon Teifi that is within Ceredigion is the PRAM project, which may be used as part of the additional wetland for the Teifi catchment’s TP offsetting. The aim of the PRAM project is to create 9 km of riparian buffer strips and two wetlands which do not have specific size or P removal targets. This will occur in conjunction with public engagement, farm management plan support and capital works, as well as some SuDS works. The project is currently in the site identification stage and aims to be completed by the end of August 2023. Arcadis will be providing support on identifying such potential wetland sites to be used for the PRAM project, which will relate to identifying the land required to help achieve category 2 measures for the entire Carmarthenshire catchment from the Afon Teifi. This is to be completed this financial year in the form of a standalone Technical Report.

In order to confirm the nutrient budgets for Ceredigion and Pembrokeshire, and by association the potential area for wetlands and its P offsetting ability, further data is required from the respective council in terms of site allocations, the scale of the developments, and the wetland feasibility approach. The output of this data will be a summary table of the sum total effect of entire catchment (Carmarthenshire, Ceredigion, and Pembrokeshire) and TP budget offset. This will validate whether these in-combination effects will satisfy the avoidance measures required for TP offsetting for the wider catchment beyond Carmarthenshire.

Following the confirmation of the total effect of the entire catchment (Carmarthenshire, Ceredigion, and Pembrokeshire) on the TP nutrient budget, this information will be compared against the total area of wetland that would be required to offset the impacts from the Afon Tywi, the Afon Teifi, and the wider catchment area. How achievable the avoidance of this is would be demonstrated by comparing the required wetland area to the entire wetland area that is actually available across the entire catchment.

Thus, the council owned locations currently suggested with the Afon Teifi and Afon Tywi SACs, along with the additional land situated within Ceredigion and Pembrokeshire would aim to satisfy the maximum wetland requirements associated with the 5 mg/l P permit limit to deliver the residential growth in CCC rLDP (2018-2033) within the impacted Afon Teifi and Afon Tywi SAC catchment. The suitability and technical feasibility of these preliminary locations will be assessed in greater detail in the next stages of the IAP.

4.5 Avoidance Summary and Next Steps

The IAP and this Appendix demonstrates the scale of the requirement to provide assurances that not only can the proposed rLDP Site Allocations be developed while achieving nutrient neutrality in Carmarthenshire, but that the rLDP will not alone, or in-combination have an adverse effect on the Teifi or Tywi SAC.

That is:

- An estimate of the additional phosphorus loading from the Sites Allocations within the rLDP.
- An indication of the types of category 1 measures which could be delivered to reduce phosphorus.
- An estimate of phosphorus reductions that could be achieved with the land available for constructed wetlands that could fulfil these mitigations.
- An estimate of in combination effects and the required and potentially available land to mitigate for these effects.
- The plans, policies and partners that can relieve the wider environmental P pressures (category 2 measures).

There are a number of steps required to ensure that these measures evolve and are implemented.

- Evolving the IAP into an AP that will demonstrate the phosphate reduction potential and evolve the selection of suitable sites for wetlands.
- Confirm the rLDP Site Allocation phasing and align with the required wetland opportunities.
- Phasing of wetland creation across the catchment to be established once the Site Allocations have been confirmed for Ceredigion and Pembrokeshire.
- Clear delivery milestones against which progress can be clearly monitored.
- How contributions from development could be collected.
- Commitment from other parties that will be involved in the Governance, development and delivery of the AP through a Statement of Common Ground.
- 1st phase of mitigation measures to be agreed by Nutrient Management Board, CCC and Arcadis.
- 1st development window to be agreed i.e., which Site Allocations can be released by the mitigation identified.
- The Action Plan to include the 1st phase of mitigation measures and the expected release of source apportionment study for the Tywi and subsequent confirmation of the DCWW/NRW permitting position.
- 2nd / 3rd phase mitigation measures to iteratively coincide with 2nd / 3rd phase Development Windows and consequent updates to the AP.
- Continued collaboration with wider stakeholders around potential phosphate removal opportunities, such as The Rivers Trust.

4.6 Applying the integrity test

The purpose of an Appropriate Assessment (AA) is to ensure that, prior to the plan being implemented, a judgment can be made as to whether it can be ascertained that the plan would have no adverse effect on the integrity of any National Site Network Sites (the integrity test).

The need for an AA is that the screening of recent changes and the new policy position from NRW on phosphates in rivers means that the changes made to the phosphate-specific policies may not be reliable as mitigation for policies and allocations previously screened out of the assessment have changed.

It is now necessary, as part of the AA, to take account of the additional mitigation measures which might be incorporated into the plan and, in particular the revised CCH4.

The IAP has been drafted to support implementation of mitigation measures. By way of clarification, this assessment record is concerned with the compliance with the Habitats Regulations. The revisions made to Policy CCH4 are only minor and are not thought to have any implications for this HRA.

Potential issues over plan delivery are separate but would not render the reliance on policy CCH4 as incompatible for the purpose of the Habitats Regulations.

5 Overall Conclusion

This Addendum report set out to address the new Natural Resources Wales (NRW) policies with regards to phosphorus standards and associated planning advice. Any SARs relating to phosphate impacts upon water quality were explored in this assessment. All other SARs not relating to water quality with regards to phosphate levels in the rLDP were screened out. These are discussed in HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033. This report is to be used in conjunction with the HRA Addendum Report: Deposit Revised Local Development Plan 2018–2033. It can be concluded that there is potential for the CCC LDP to have a negative impact upon the Afon Tywi and the Afon Teifi, however, when considering the potential land available within Carmarthenshire and the in-combination effects from other LDPs in the catchment, there will be sufficient potential land to be used for wetland creation to offset the additional P discharged from the developments.

Additional phasing of development increases the confidence in delivery of these measures, along with the evolution of the Interim Action Plan.

The changes to site allocation screening process and the changes made to policy CCH4 were examined, in order to demonstrate that all amendments which have occurred since the First Deposit rLDP are considered in terms of their implications upon the HRA process. The screening of the nine SACs within the catchment highlighted that the proposed site allocations had a negative impact pathway upon Afon Teifi and Afon Tywi only. It was demonstrated that, for the Site Allocations, from the initial list screened by the CCC and the additional screening performed by Arcadis with a revised P limit of 5 mg/l, the total site allocations that are currently thought have a significant increase on the TP release into the catchment have been reduced to 21 sites. The Afon Tywi now has 6 site allocations and the Afon Teifi now has 15 site allocations. Additionally, the changes made to policy CCH4, previously known as policy CCH3, has sufficiently strengthened the policy wording with regards to the need to demonstrate no adverse effect on SACs with regards to Phosphorus and the need to agree mitigation on a case by case basis with the CCC and NRW.

Wetland creation was emphasised as a viable avoidance measure to offset the potential P added into the catchment by the proposed developments. In this instance, the Tywi has enough council owned land to meet the wetland creation for offsetting the effects from this SAC, however the Teifi does not have enough council owned land for this. Despite this, there is the potential for wider in-combination effects from other LDPs in the catchment, including land within Ceredigion and Pembrokeshire to supplement land required for sufficient wetland creation. From assessments performed by Arcadis using the potential land available across these counties and the amount of TP that they would be able to offset, there is sufficient wetland area available that can be used to avoid impacts from development in the SACs upon the wider catchment as a whole.

In respect of the potential effects from discharge of wastewater on the Afon Tywi and Afon Teifi SACs, following Appropriate Assessment, and taking account of the changes to policy CCH4, changes to site allocations, and the total availability of council owned land for wetland construction in the wider catchment, it can be concluded that the policy and site changes will have no adverse effect for this HRA addendum and that there will be enough potential land to create wetlands for offsetting the additional P from the developments.

It is therefore the conclusion of this HRA Appendix Assessment that, with the proposed policy amendments (and delivery of the mitigation described therein), the changes to the Site Allocations, and the availability of potential land for wetland creation that all potentially relevant impacts with regards to Phosphorus have been subject to screening process and it is therefore appropriate to conclude that the rLDP plan will have no adverse effect on the integrity of any National Site Network Sites.

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Appendix D: NRW Response (08/12/2023)

Please note that this letter has been redacted for publication.

Appendix E: HRA Screening of rLDP Strategic Policies

Policy	Category	Justification & Conclusion	Outcome
SP1: Strategic Growth	G	This policy is an overarching policy which provides for residential and employment growth. As such, it is a driver of potential impacts on European Sites. However, the implications of potential change arisen from this policy are more appropriately assessed under specific policies and/or allocations through which such growth will be implemented. <u>Therefore, this policy is screened out of the need for further assessment in accordance with the guidance provided at section F.6.2.3 of the HRA Handbook.</u>	Screened Out
SP2: Retail and Town Centres	B	This policy relates specifically to maintaining the vibrancy, viability and attractiveness of Carmarthenshire’s town, Mid Order Town Centres, and Lower Order Town Centres; and setting the criteria of proposal. Implementation of this policy would not lead directly to development, as it lists general criteria for testing the acceptability of proposals. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out
SP3: Sustainable Distribution – Settlement Framework	B	This policy sets out a strategic approach to the allocation of housing and employment across the county. The specific locations of the proposed allocations are subject to separate screening. The overarching policy itself is simply referring to the strategic approach adopted and, <u>Therefore, this policy is screened out of the need for further assessment in accordance with the guidance provided at section F.6.2.3 of the HRA Handbook.</u>	Screened Out
SP4: A Sustainable Approach to Providing New Homes	G	This policy is an overarching policy which provides for residential and employment growth. As such, it is a driver of potential impacts on European Sites. However, the implications of potential change arisen from this policy are more appropriately assessed under specific policies and/or allocations through which such growth will be implemented. <u>Therefore, this policy is screened out of the need for further assessment in accordance with the guidance provided at section F.6.2.3 of the HRA Handbook.</u>	Screened Out

SP5: Affordable Homes Strategy	G	This policy is an overarching policy which set out the general criteria for the development of affordable homes. It cannot have any effect on a European Site. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out
SP6: Strategic Sites	C	This policy refers to specific proposals for projects that would progress irrespective of rLDP adoption. Proposals will be subject to HRA if required through the planning process. <u>Therefore, it is determined that there will be no likely significant impacts on European sites because of the implementation of this policy.</u>	Screened Out
SP7: Employment and the Economy	G	This policy is an overarching policy which provides for employment growth. As such, it is a driver of potential impacts on European Sites. However, the implications of potential change arisen from this policy are more appropriately assessed under specific policies and/or allocations through which such growth will be implemented. <u>Therefore, this policy is screened out of the need for further assessment in accordance with the guidance provided at section F.6.2.3 of the HRA Handbook.</u>	Screened Out
SP8: Welsh Language and Culture	F	This policy will not lead to any development, and relates to safeguarding the Welsh language and culture. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out
SP9: Infrastructure	B	This policy sets out the general criteria for testing the suitability of development and cannot have any effect on a European Site. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out
SP10: Gypsy and Traveller Provision	H	This policy identifies the need to address the accommodation needs of gypsies, travellers and travelling show people. The policy sets out the Council's legal duty, and outlines the allocation of two sites (PrC/GT2 and PrC2/GT1). As such, it is a driver of potential impacts on European Sites. However, the implications of potential change arisen from this policy are more appropriately assessed under the specific allocations through which such growth will be implemented. <u>Therefore, this policy</u>	Screened Out

		<u>is screened out of the need for further assessment in accordance with the guidance provided at section F.6.2.3 of the HRA Handbook.</u>	
SP11: The Visitor Economy	B	This policy relates to supporting sustainable tourism within the County. Whilst support the design and sustainability of new development, there are no specific sites allocated under this policy. The policy states that tourism related developments will be “ <i>sustainably located</i> ” and will “ <i>preserve social, economic and environmental fabric for future generations</i> ”. <u>Given that the aim of this policy emphasises sustainable tourism, it is considered unlikely that there would be LSE on European sites because of the implementation of this policy.</u>	Screened Out
SP12: Placemaking and Sustainable Places	B	This policy refers specifically to ensuring that development considers placemaking, sustainability and high-quality design, and proposed criteria to test plan proposals for their general acceptability. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out
SP13: Rural Development	A	Although this policy does support development in rural areas, there are no specific areas or sites allocated under the policy. The policy does state that ‘the sustainability of the countryside and natural environment’ is ‘imperative’ and that ‘development would need to demonstrate that they accord with the provisions of national planning policies’. <u>Given that this policy emphasises that the consideration of the sustainability of countryside and natural environment is imperative and that national planning policy must be adhered to, it is considered unlikely that there would be LSE on European sites as a result of this policy.</u>	Screened Out
SP14: Maintaining and Enhancing the Natural Environment	D	The direct purpose of this policy is the protection and enhancement of the natural environment. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out
SP15: Protection and Enhancement of the Built and Historic Environment	D	The direct purpose of this policy is the protection and enhancement of the built and historic environment. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out

<p>SP16: Climate Change</p>	<p>B</p>	<p>This policy relates specifically to ensuring development is resilient to climate change. Implementation of this policy would not lead directly to development, as they list general criteria for testing the acceptability of proposals. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u></p>	<p>Screened Out</p>
<p>SP17: Transport and Accessibility</p>	<p>B</p>	<p>This policy relates specifically to ensuring the plan contributes to the delivery of a sustainable transport system through sustainable location of development and does not directly provide for transport infrastructure. Implementation of this policy would not lead directly to development, as they list general criteria for testing the acceptability of proposals. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u></p>	<p>Screened Out</p>
<p>SP18: Mineral Resources</p>	<p>I</p>	<p>This policy is an overarching policy which sets out the criteria for associated mineral proposals and does not contain allocations for such. Nevertheless, in response to a previous consultation made, there are extant minerals permissions beneath Cernydd Carmel SAC. This policy will be considered further at the appropriate assessment stage. (See Ref 34-6, 39, 41)</p>	<p>Screened In</p>
<p>SP19: Sustainable Waste Management</p>	<p>B</p>	<p>This policy promotes change, but the wording of the policy includes reference to there being no significant, adverse effects upon the environment. <u>There would be no LSE on European sites because of the implementation of this policy</u></p>	<p>Screened Out</p>

Appendix F: HRA Re/Screening of rLDP Specific Policies

Specific Policy	SAR Ref.	Screening Category	Justification & Conclusion	Screening Outcome
Screening of Amendments				
SG1: Regeneration and Mixed-Use Sites	SAR 11–14		Amendments made to sites will be assessed individually.	
SG2: Reserve Sites	SAR15		Amendments made to sites will be assessed individually.	
RTC1: Protection of Local Shops and Facilities	SAR8	B	This policy lists general criteria to test the acceptability of retail proposals outside of town centres. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out
HOM1: Housing Allocations	SAR 11–12		Amendments made to sites will be assessed individually.	
EME3: Employment Proposals on Allocated Sites	SAR 34–37		Amendments made to sites will be assessed individually.	
CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas	SAR9, 67	B	These policies list the general criteria under which proposals for renewable energy will be supported. <u>Therefore, there would be no LSE on European sites because of the implementation of this policy.</u>	Screened Out
CCH2: Renewable Energy Outside Pre-Assessed Areas and Local Search Areas		B		Screened Out

Specific Policy	SAR Ref.	Screening Category	Justification & Conclusion	Screening Outcome
Rescreening of rLDP Specific Policies				
HOM3: Homes in Rural Villages	Not applicable as rLDP amendments are not the reason for rescreening. Related SARs are irrelevant.		I	<p>These policies do not propose allocations for development themselves. <u>They collectively set out the requirements for (and, in some instances, support) planning applications in which the ensuing development (as potential sources of P) could indirectly affect P sensitive SACs (namely, the Afon Teifi, Afon Tywi, River Wye/Afon Gwy, and Afonydd Cleddau).</u></p>
HOM4: Homes in Non-Defined Rural Settlements				
HOM5: Conversion or Subdivision of Existing Dwellings				
HOM6: Specialist Housing				
HOM7: Renovation of Derelict or Abandoned Dwellings				
HOM8: Residential Caravans				
HOM9: Ancillary Residential Development				
GTP1: Gypsy and Traveller Accommodation				
Screened In				

Specific Policy	SAR Ref.	Screening Category	Justification & Conclusion	Screening Outcome	
VE2: Holiday Accommodation					
VE3: Touring Caravan, Camping and, and Non-Permanent Alternative Camping Accommodation					
VE4: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation.					
RD1: Replacement Dwellings in the Open Countryside	Not applicable as rLDP amendments are not the reason for rescreening. Related SARs are irrelevant.		I	These policies do not propose allocations for development themselves. <u>They collectively set out the requirements for (and, in some instances, support) planning applications in which the ensuing development (as potential sources of P) could indirectly affect P sensitive SACs (namely, the Afon Teifi, Afon Tywi, River Wye/Afon Gwy, and Afonydd Cleddau).</u>	Screened In
RD2: Conversion and Re-Use of Rural Buildings for Residential Use					
RD3: Farm Diversification					
RD5: Equestrian Facilities					
WM2: Landfill Proposals					
CCH4: Water Quality and Protection of Water Resources					

Specific Policy	SAR Ref.	Screening Category	Justification & Conclusion	Screening Outcome	
INF5: Rural Allocations outside Public Sewerage System Catchments			I	This policy lists general criteria to assess the acceptability rural allocations outside public sewerage system catchments. <u>The justification for screening in is analogous with the above, in addition to the requirement set out in NRW Guidance.</u>	Screened In
NE4: Development within the Caeau Mynydd Mawr SPG Area			M	<u>In accordance with Section F.6.3.12 of the HRA Handbook, this is screened in as it is a bespoke policy which intends to avoid/reduce harmful effects on a Caeau Mynydd Mawr SAC.</u>	Screened In

Appendix G: HRA Screening of Amended rLDP Allocations

Site Ref	SuV12/h2	Name	Llandre	Cluster	1
Observations	New allocation - The proposed development site is approximately 8km from Afon Tywi SAC.				
Overall Screening	Category	I - May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		I	The site is adjacent to a water course and is spatially linked to Afon Tywi SAC. Potential effects including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.		Screened In
Effects on marine environment		I	The site is adjacent to a water course and is spatially linked to Afon Tywi SAC and CBEEMS. Potential effects including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.		Screened In
Effects on the coast		G	None		Screened Out
Effects on mobile species		I	The proximity of the site to a water course may present risks to otter that may be in the area.		Screened In
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Tywi P Sensitive SAC Catchment.		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		I	The proximity of the site to a water course may present risks to otter that may be in the area.		Screened In

Site Ref	PrC2/MU3	Name	Former YMCA, Stepney Street	Cluster	2
Observations	New allocation - The site is located approximately 1.4km from the nearest boundary of the Carmarthen Bay and Estuaries European Marine Site SAC and Burry Inlet SPA. At such distances localised effects associated with proximity of development are unlikely.				
Overall Screening	Category	I - May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		I	The site is adjacent to a water course which may result in a causal connection or link to CBEEMS with potential effects including those on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation. Nevertheless, given the built upon nature of the surrounding developments which insects this allocation from the water course, these are thought to be unlikely.		Screened In
Effects on marine environment		I	(same as above)		Screened In
Effects on the coast		G	None		Screened Out
Effects on mobile species		G	The site is in close vicinity to a water course; however, it is the other side of a road from the site and is unlikely to be used as resting/breeding habitat for otter.		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		G	The site is outside P Sensitive SAC Catchment		Screened Out
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	The site is in close vicinity to a water course, however it is the other side of a road from the site and is therefore unlikely to be used as resting/breeding habitat for otter.		Screened Out

Site Ref	SuV49/h1	Name	Awel y Mynydd	Cluster	5
Observations		New allocation			
Overall Screening	Category	K - Site not likely to have significant effect either alone or in combination.			
	Outcome	Screen Out			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	None		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		G	None		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		G	The site is outside P Sensitive SAC Catchment		Screened Out
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SeC1/h7	Name	Land off Heol Glyndwr	Cluster	1
Observations	New allocation				
Overall Screening	Category	K - Site not likely to have significant effect either alone or in combination.			
	Outcome	Screen Out			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	None			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	G	None			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	G	The site is outside P Sensitive SAC Catchment			Screened Out
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	None			Screened Out

Site Ref	SeC15/h2	Name	Land adjacent to Bryndeilog, Tywi Avenue	Cluster	5
Observations	Re-screened (within SAC catchment) – 8 Dwellings (1.183 Ha) Llandovery WwTW				
Overall Screening	Category	I - May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	I	The site is immediately adjacent to Afon Tywi SAC and there is the potential for impacts on water quality due to run off during both the construction and operational phase.			Screened In
Effects on marine environment	I	The site is immediately adjacent to Afon Tywi SAC which is spatially linked to CBEEMS. Potential for Construction/operational phase impacts on water quality due to run off.			Screened In
Effects on the coast	G	None			Screened Out
Effects on mobile species	I (for potential effects on Otter)	The site is just within the maximum 18km foraging range for breeding peregrine from Elenydd-Malleau SPA, however it is outside of the core range. The potential loss of habitat because of this development is not considered likely to have a significant effect on peregrine. The site is in proximity to a water course may present risks to otter			Screened In
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Tywi P Sensitive SAC Catchment.			Screened In
Effects of increased development: Air Pollution	H	The site is within 200m of Afon Tywi, however the site is not identified as being sensitive to changes in Air Quality and it is considered that the level of development in this area is low enough that there will be no likely significant effects on air quality.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	I	The site is in proximity to a water course may present risks to otter			Screened In

Site Ref	SeC17/h2	Name	Land off Heol Pendref	Cluster	5
Observations	Re-screened (within SAC catchment) – 8 Dwellings (0.4 Ha) Llangadog WwTW				
Overall Screening	Category	I - May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is approximately 1.5km from Afon Tywi SAC and is not linked spatially to the site. Other than nutrient related (see below), at such distances localised effects associated with proximity of development are unlikely.			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	H	The site is just within the maximum 18km foraging range for breeding peregrine from Elenydd-Mallean SPA, however it is substantially outside of the core range of 2km. The loss of habitat as a result of this development is not considered likely to have a significant effect on peregrine.			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Tywi P Sensitive SAC Catchment.			Screened In
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	None			Screened Out

Site Ref	SeC17/h1	Name	Land opposite Llangadog C.P School	Cluster	5
Observations	Re-screened (within SAC catchment) – 16 Dwellings (0.543 Ha) Llangadog WwTW				
Overall Screening	Category	I - May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is approximately 1.1km from Afon Tywi SAC and is not linked spatially to the site. Other than nutrient related (see below), at such distances localised effects associated with proximity of development are unlikely.			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	H	The site is just within the maximum 18km foraging range for breeding peregrine from Elenydd-Mallean SPA, however it is substantially outside of the core range of 2km. The potential loss of habitat as a result of this development is not considered likely to have a significant effect on peregrine.			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Tywi P Sensitive SAC Catchment.			Screened In
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	None			Screened Out

Site Ref	SuV51/h1	Name	Land opposite Village Hall	Cluster	5
Observations	Re-screened (within SAC catchment) – 8 Dwellings (0.493 Ha) Cwm Ifor WwTW				
Overall Screening	Category	I - May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is approximately 560m from Afon Tywi SAC and is not linked spatially to the site. Other than nutrient related (see P below), at such distances localised effects associated with proximity of development are unlikely.			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	H	The site is just within the maximum 18km foraging range for breeding peregrine from Elenydd-Mallean SPA, however it is substantially outside of the core range of 2km. The potential loss of habitat as a result of this development is not considered likely to have a significant effect on peregrine.			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Tywi P Sensitive SAC Catchment.			Screened In
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	None			Screened Out

Site Ref	SeC16/h1	Name	Llandeilo Northern Quarter	Cluster	5
Observations	Re-screened (within SAC catchment) – 27 Dwellings (1.674 Ha) Ffairfach WwTW				
Overall Screening	Category	I - May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is approximately 600m from Afon Tywi SAC and is not linked spatially to the site. Other than nutrient related (see P below), at such distances localised effects associated with proximity of development are unlikely.			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	I	The proximity of the site to a water course may present risks to otter that may be in the area.			Screened In
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Tywi P Sensitive SAC Catchment.			Screened In
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	I	The proximity of the site to a water course may present risks to otter that may be in the area.			Screened In

Site Ref	SuV17/h1	Name	Rear of former joinery, Station Road	Cluster	1
Observations	Re-screened (within SAC catchment) – 35 Dwellings (1.519 Ha) Nantgaredig WwTW				
Overall Screening	Category	I – May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is approximately 630m from Afon Tywi SAC and is not linked spatially to the site. Other than nutrient related (see P below), at such distances localised effects associated with proximity of development are unlikely.			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	G	None			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Tywi P Sensitive SAC Catchment.			Screened In
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	None			Screened Out

Site Ref	SeC12/h1	Name	Trem Y Ddol	Cluster	4
Observations		Re-screened (within SAC catchment) – 17 Dwellings (0.61 Ha) WwTw Adpar			
Overall Screening	Category	I – May have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 280m from Afon Teifi SAC and is not spatially linked to the site.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		G	None		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		H	The site is within 200m of Afon Teifi, however the site is not identified as being sensitive to changes in Air Quality and it is considered that the level of development in this area is low enough that there will be no likely significant effects on air quality.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SeC12/h3	Name	Land rear of Dolcoed	Cluster	4
Observations	Re-screened (within SAC catchment) – 20 Dwellings (1.34 Ha) WwTw Adpar				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	I	The site is near to Afon Teifi SAC. Potential for Construction/operational phase impacts on water quality due to run off.			Screened In
Effects on marine environment	I	The Afon Teifi SAC is spatially linked to Cardigan Bay SAC/West Wales Marine SAC and any impacts on water quality due to run off during construction/operation may have effects downstream.			Screened In
Effects on the coast	G	None			Screened Out
Effects on mobile species	H	The site is adjacent to suitable otter habitat and is within 1km of the SPA, however it is the other side of a road from the site and is therefore unlikely to be used as resting/breeding habitat.			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Teifi P Sensitive SAC Catchment			Screened In
Effects of increased development: Air Pollution	H	The site is within 200m of Afon Teifi, however the site is not identified as being sensitive to changes in Air Quality and it is considered that the level of development in this area is low enough that there will be no likely significant effects on air quality.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	H	The site is adjacent to Afon Teifi SAC, however it is the other side of a road from the site within the urban form, and is therefore unlikely to be used as resting/breeding habitat for otter.			Screened Out

Site Ref	SeC13/h1	Name	Adjacent Y Neuadd	Cluster	4
Observations	Re-screened (within SAC catchment) – 10 Dwellings (0.5 Ha) WwTw Llanybydder				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is not spatially linked to is Afon Teifi SAC.			Screened Out
Effects on marine environment	I	The Afon Teifi SAC is spatially linked to Cardigan Bay SAC/West Wales Marine SAC and any impacts on water quality due to run off during construction/operation may have effects downstream.			Screened In
Effects on the coast	G	None			Screened Out
Effects on mobile species	I (Based on potential for impacts on otter)	The site is just within the maximum 18km foraging range for breeding peregrine from Elenydd-Mallean SPA, however it is substantially outside of the core range of 2km. Any loss of foraging habitat because of this development is not considered likely to have a significant effect on breeding peregrine. Additionally, the proximity of the site to a water course may present risks to otter that may be in the area.			Screened In
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Teifi P Sensitive SAC Catchment			Screened In
Effects of increased development: Air Pollution	H	The site is within 200m of Afon Teifi, however the site is not identified as being sensitive to changes in Air Quality and it is considered that the level of development in this area is low enough that there will be no likely significant effects on air quality.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	I	The proximity of the site to a water course may present risks to otter that may be in the area.			Screened Out

Site Ref	SeC14/h1	Name	Blossom Garage	Cluster	4
Observations		Re-screened (within SAC catchment) – 20 Dwellings (0.605 Ha) WwTw Pencader			
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 0.38km from Afon Teifi SAC and is not linked spatially to the site. Other than nutrient related (see P effects), at such distances localised effects associated with proximity of development are unlikely.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		I	The proximity of the site to a water course may present risks to otter that may be in the area.		Screened In
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		I	The site is in proximity to a water course may present risks to otter, however it is the other side of a road from the site and is therefore unlikely to be used as resting/breeding habitat.		Screened In

Site Ref	SeC14/h2	Name	Land adjacent Maescader	Cluster	4
Observations	Re-screened (within SAC catchment) – 24 Dwellings (0.755 Ha) WwTw Pencader				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is approximately 0.4km from Afon Teifi SAC and is not linked spatially to the site. Other than nutrient related (see P), at such distances localised effects associated with proximity of development are unlikely.			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	H	The site is in proximity to a water course may present risks to otter, however it is the other side of a road from the site and is therefore unlikely to be used as resting/breeding habitat.			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Teifi P Sensitive SAC Catchment			Screened In
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	None			Screened Out

Site Ref	SuV33/h1	Name	Land opposite Brogeler	Cluster	4
Observations	Re-screened (within SAC catchment) – 5 Dwellings (0.293 Ha) WwTw Drefach/Felindre				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 0.45km from Afon Teifi SAC and is not linked spatially to the site. Other than nutrient related (see P), at such distances localised effects associated with proximity of development are unlikely.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		H	The site is in proximity to a water course may present risks to otters, however, there are two roads and other development between that and the site and is, therefore, unlikely to be used as resting/breeding habitat.		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SuV35/h1	Name	Land adjacent Arwynfa	Cluster	4
Observations	Re-screened (within SAC catchment) – 6 Dwellings (2.488 Ha) WwTw Drefach/Felindre				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is approximately 1.4km from Afon Teifi SAC and is not linked spatially to the site. Other than P-related (see below), at such distances localised effects associated with proximity of development are unlikely.			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	G	None			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Teifi P Sensitive SAC Catchment			Screened In
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	None			Screened Out

Site Ref	SuV36/h1	Name	Cae Pensarn Helen	Cluster	4
Observations	Re-screened (within SAC catchment) – 6 Dwellings (0.348 Ha) No public sewerage connection				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 1.9km from Afon Teifi SAC and is not linked spatially to the site. Other than P-related (see below), at such distances localised effects associated with proximity of development are unlikely.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		G	None		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SuV36/h2	Name	Land at Bryndulais	Cluster	4
Observations		Re-screened (within SAC catchment) – 16 Dwellings (0.704 Ha) No public sewerage connection			
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 2.1km from Afon Teifi SAC and is not linked spatially to the site. Other than P-related (see below), at such distances localised effects associated with proximity of development are unlikely.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		G	None		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SuV37/h2	Name	Land south of Cae Coedmor	Cluster	4
Observations	Re-screened (within SAC catchment) – 20 Dwellings (0.897 Ha) Lampeter WwTw				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 1.1km from Afon Teifi SAC and is not linked spatially to the site. Other than P-related (see below), at such distances localised effects associated with proximity of development are unlikely.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		H	The site is just within the maximum 18km foraging range for breeding peregrine from Elenydd-Malleau SPA, however it is substantially outside of the core range of 2km. The potential loss of habitat as a result of this development is not considered likely to have a significant effect on breeding peregrine.		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SuV37/h3	Name	Land adjacent to Lleinau	Cluster	4
Observations	Re-screened (within SAC catchment) – 10 Dwellings (0.497 Ha) Lampeter WwTw				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect	Screening Category	Justification & Conclusion			Screening Outcome
Effects on aquatic environment	G	The proposed development site is approximately 1.1km from Afon Teifi SAC and is not linked spatially to the site. Other than P-related (see below), at such distances localised effects associated with proximity of development are unlikely.			Screened Out
Effects on marine environment	G	None			Screened Out
Effects on the coast	G	None			Screened Out
Effects on mobile species	H	The site is just within the maximum 18km foraging range for breeding peregrine from Elenydd-Malleau SPA, however it is substantially outside of the core range of 2km. The potential loss of habitat as a result of this development is not considered likely to have a significant effect on breeding peregrine.			Screened Out
Recreational effects	H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Abstraction	G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.			Screened Out
Effects of increased development: Wastewater	J	None			Screened Out
Effects of increased development: Phosphorous	I	The site is within the Afon Teifi P Sensitive SAC Catchment			Screened In
Effects of increased development: Air Pollution	G	Site or accompanying road infrastructure do not run within 200m of a European Site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	None			Screened Out

Site Ref	SuV38/h1	Name	Maes y Bryn	Cluster	4
Observations	Re-screened (within SAC catchment) – 6 Dwellings (0.29 Ha) Capel Iwan WwTw				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 600m from Afon Teifi SAC and is not linked spatially to the site. Other than P-related (see below), at such distances localised effects associated with proximity of development are unlikely.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		H	The site is just within the maximum 16km foraging range for Barbastelle Bats, however it is substantially outside of the core range of 2km. The potential for loss of habitat as a result of this development is not considered likely to have a significant effect on Barbastelle Bats.		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SuV39/h1	Name	Adjacent Yr Hendre	Cluster	4
Observations	Re-screened (within SAC catchment) – 7 Dwellings (0.525 Ha) Llanfihangel-ararth WwTw				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 300m from Afon Teifi SAC and is not linked spatially to the site. Other than P-related (see below), at such distances localised effects associated with proximity of development are unlikely.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		G	None		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SuV41/h2	Name	Cilgwyn Bach	Cluster	4
Observations	New Allocation (within SAC catchment) – 14 Dwellings (11 Outline, 3 Reserved Matters Granted) (1.351 Ha) Llandysul WwTw				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	None		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		G	None		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	SuV43/h1	Name	Blossom Inn	Cluster	4
Observations	Re-screened (within SAC catchment) – 8 Dwellings (3 Full Planning, 5 Without) (0.722 Ha) Llandysul WwTw				
Overall Screening	Category	I – Proposal may have a significant effect on a site alone			
	Outcome	Screen In			
Detailed Screening Results					
Potential Effect		Screening Category	Justification & Conclusion		Screening Outcome
Effects on aquatic environment		G	The proposed development site is approximately 1.2km from Afon Teifi SAC and is not linked spatially to the site. Other than P-related (see below), at such distances localised effects associated with proximity of development are unlikely.		Screened Out
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		G	None		Screened Out
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.		Screened Out
Effects of increased development: Wastewater		J	None		Screened Out
Effects of increased development: Phosphorous		I	The site is within the Afon Teifi P Sensitive SAC Catchment		Screened In
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	None		Screened Out

Site Ref	PrC2/E2 (i)	Name	Land east of Calsonic	Employment Allocation
Observations		New Employment Allocation – (4.457ha)		
Overall Screening	Category	I – May have a significant effect on a site alone		
	Outcome	Screen In		
Detailed Screening Results				
Potential Effect		Screening Category	Justification & Conclusion	Screening Outcome
Effects on aquatic environment		I	The site is adjacent to a water course and is spatially linked to CBEEMS. Potential effects including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In
Effects on marine environment		I	The site is adjacent to a water course and is spatially linked to CBEEMS. Potential effects including on water quality by pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In
Effects on the coast		G	None	Screened Out
Effects on mobile species		I	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In
Recreational effects		H	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened Out
Effects of increased development: Abstraction		G	Screened out at Preferred Strategy stage and conclusion is 'adopted' for the purpose of this HRA, where no additional material has emerged to the contrary.	Screened Out
Effects of increased development: Wastewater		J	None	Screened Out
Effects of increased development: Air Pollution		G	Site or accompanying road infrastructure do not run within 200m of a European Site.	Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		I	The proximity of the site to a water course may present risks to otter that may be in the area.	Screened In