



Carmarthenshire County Council

**Habitats Regulations Assessment
Preliminary Screening for the Preferred Strategy**

Recommendations following Public Consultation

February 2010

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1 Recommendations Following Public Consultation

1.1 Introduction

Carmarthen County Council completed the public consultation of the Preferred Strategy on the 04 Jan 2010. This included the Habitats Regulation Assessment (HRA) Preliminary Screening Report.

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

1.2 Recommendations

Reference	HRS001
Respondent	Mrs Louise Edwards
Organisation	Environment Agency Wales
Response	Water quality: We note you have included sewage discharges as a factor which could be a likely significant driver of water quality issues for the future. As always we would advise your Authority to consult with Dwr Cymru
Recommendation	Note this response and going forward include consultation with Dwr Cymru with regard to sewage discharges

Reference	HRS002
Respondent	Mrs Louise Edwards
Organisation	Environment Agency Wales
Response	Water supply and hydrology: We note that a specific driver is "additional water supply.." we would again direct your Authority to EAW's and Dwr Cymru's Water Resources Strategy
Recommendation	Review the EAW and Dwr Cymru Water Resource Strategy as part of LDP development to reduce the impacts of additional water supply on European Sites

Reference	HRS003
Respondent	Mrs Louise Edwards
Organisation	Environment Agency Wales
Response	Conclusions: We agree that water treatment infrastructure should be in place ahead of proposed development
Recommendation	None required

Reference	HRS004
Respondent	Mrs Louise Edwards
Organisation	Environment Agency Wales
Response	The bullet point which starts "The code for sustainable homes" refers to previous site conditions for surface water runoff, there should be a policy within the deposit plan for managing surface water, this should include SUDS
Recommendation	Consider incorporating a policy within the LDP that covers the management of surface water runoff, to include SUDS.

Reference	HRS005
Respondent	Lynne Campbell
Organisation	Composite Energy Limited
Response	<p>Please refer to attached covering letter. In summary, Composite Energy supports the need for Habitat regulations but where conflicts arise it is essential that the regulations contain a mechanism to balance conflicting factors and should the need arise there should be clear guidance that matters of national and strategic importance will take priority.</p> <p>Supporting letter: CB Richard Ellis is instructed by Composite Energy Limited to submit representations on the Habitat Regulations Screening Report and Constraints Plan. Composite Energy is based in Stirling and is licensed to extract hydrocarbons under the Petroleum Exploration and Development Licence (PEDL). The licence enables Composite Energy to explore and exploit Cool Bed Methane (CBM) within the licensed area. Within Carmarthenshire area, Composite Energy and its license and development partner BG Group has been awarded licences under the 13th On shore Oil and Gas Licensing Round. Composite Energy Limited supports the principle of the habitat regulations but we have been asked to make a representation to ensure that proper consideration is given to all relevant factors when making any designation. Local habitats fall within a hierarchy of nature and environmental designations, including National and European designations. In making any designation or allocation to protect habitats it is important to</p>

recognise what other factors govern land use within an area. Composite Energy is concerned about the potential impact on its licence areas of designations made under the Habitat Regulations if they are not given adequate consideration.

The Government's energy policy seeks to encourage the extraction of CBM from deep coal seams as part of a strategy for cleaner cool technology. CBM is important to the UK as it is a potential long term source of indigenous natural gas. This untapped energy source has the potential to contribute greatly to the provision of a secure and diverse energy supply, an energy source that would go untapped without CBM extraction.

CBM provides an opportunity to extract a nationally important natural energy resource without significant environmental impact.

Composite Energy has been meeting with development plan officers in all the local authorities where it has been granted licences and representatives of Composite Energy have previously met Officers of your authority. Composite Energy has been making representations to Core Strategy and Issues and Options documents across the country seeking to ensure that development plans contain policies to support CBM and that planning authorities identify:

- Coal reserves at depth below the surface of 200 1,500 metres and areas which are licensed for CBM.
- Recognise that design solution for the development of the licence area may not have been resolved at the point where planning permission is sought. Policy should be flexible and allow proposals to be considered within their local context.

The submissions make the point that proposals for the extraction of CBM are in the national interest and should be favourably considered in the areas of search identified on key diagrams.

Applications for individual appraisal wells or groups of appraisal wells developed as part of the CBM process for exploration and production, and the interconnecting pipelines and other essential gas processing or distribution infrastructure, should be permitted as long as significant adverse environmental effects do not arise. It is recognised that applicants should present sufficient information to adequately assess the environmental implications of proposals but the key consideration should be impact on Natura 2000 sites or European protected species. A balanced view will need to be taken where local wildlife sites affect the ability to explore and exploit CBM.

Composite Energy believes that the selection criteria for designations made under the Habitat Regulations need to be worded in such a manner that it allows a balanced view to be taken if conflicts arise with other land use matters. This is particularly important for matters of national importance such as energy exploration and production. The guidance should make clear that designations under the Habitat Regulations are a factor to take into consideration when assessing development proposals but they will not prejudice the ability to meet national and strategic planning objectives, such as the exploration and exploitation of CBM.

In summary, Composite Energy supports the need for Habitat Regulations but where conflicts arise it is essential that the regulations contains a mechanism to balance conflicting factors and should the need

	arise there should be dear guidance that matters of national and strategic importance will take priority.
Recommendation	This response is referring to the designation of European Sites and the effect this will have on the ability to extract CBM. The LDP process does not designate European sites however it may be necessary to word policies/areas relating to CBM exploitation in such a way to avoid a blanket exclusion of this development if close to an existing European site.

Reference	HRS006
Respondent	Mr Bryan Graham
Organisation	City and County of Swansea
Response	The Council supports the Habitats Regulation Assessment Preliminary Screening Report for the Preferred Strategy and welcomes future discussion and collaboration between our Authorities on cross boundary issues that may arise during the progression of the Authorities respective LDPs.
Recommendation	Continue collaboration and discussion of cross boundary issues as LDP and HRA processes progress

Reference	HRS007
Respondent	Llinos Quelch
Organisation	Ceredigion County Council
Response	<p>With regards to the recommendations of the report under conclusions;</p> <ul style="list-style-type: none"> • Ceredigion would like to see not only water treatment infrastructure in place ahead of proposed development, but there to be recognition that even if the infrastructure is in place, there may still be effects and there for appropriate upgrades may be needed. Additionally phasing of development would hopefully mean that the effects to the river SACs in particular to can be monitored to see whether there are beginning to be signs of effects. Ceredigion CC particularly want to ensure that there will be no in-combination or cumulative effects on the Afon Teifi. Would like to work with Carmarthen on this to ensure cross boundary consistency. • There is no mention of reducing surface water pollution and sedimentation into water courses. This too could also have an in-combination or cumulative effects on the Afon Teifi. A policy on SUDS that covers surface water run-off and pollution rather than just relying on the code for sustainable homes could help prevent this impact. • Ceredigion recognize that cross border working will be required to attempt to avoid land take or fragmentation of habitats of European Sites and associated habitats.
Recommendation	<p>Consider the additional measures suggested by Ceredigion to be incorporated within LDP process as it is taken forward, particularly in relation to the avoidance or reduction in effects on the cross border European sites such as the Afon Tywi SAC.</p> <p>Consider incorporating a policy within the LDP that covers the management of surface water runoff, to include SUDS.</p> <p>Include Ceredigion into the LDP/HRA process going forward to ensure cross border working.</p>

Reference	HRS008
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Respondent	Mark Newey
Organisation	Welsh Assembly Government
Response	<p>We note that the Preferred Strategy has been subject to HRA screening: supporting documentation (Jacobs) the HRA Preliminary Screening Report for the Preferred Strategy (Nov09) subject of current consultation. 25 European Sites potentially affected by the Carmarthenshire Preferred Strategy have been identified. There are a number of Natura 2000 sites designated for their habitats and species which will need to be considered; that HRA is being carried out throughout the production of the plan, and reported separately but parallel to this SA process; that the Preferred Strategy will be screened against the conservation objectives for the Natura 2000 sites and consulted on with the statutory consultees.</p> <p>It is vital that the authority is able to demonstrate that it has followed the correct procedure outlined in the SEA Regulations, the Habitats Regulations, has had regard to European Protected Species and that the deposit plan has had regard to the findings.</p> <p>Correct reference should be made to the Wales SEA Regulations and to the Habitats Regulations which transpose the requirements of the SEA Directive and the Habitats Directive respectively</p>
Recommendation	Consider going forward through the HRA process that the documentation required to demonstrate that due process has been followed is in accordance with the Habitats Regulations. Use of the David Tyldesley Guidance document will mean that the HRA process will fulfil the requirements of the Regulations.

Reference	HRS009 to HRS20 inclusive
Respondent	Mrs Suzanne Davies
Organisation	Whitland Town Council
Response	<p>Whitland Town Council have severe reservations regarding the proposed sites due to the following:</p> <ul style="list-style-type: none"> • Floodplain • Sewerage capacity • Disposal of water including flood water • Infrastructure • Employment/Industry • Amenities • Road access • Disability access • Outside the present JUDP.
Recommendation	<p>The responses are all in relation to proposed candidate sites and are not specific to the HRA preliminary screening report.</p> <p>The LDP process going forward should consider that these proposed candidate sites may have an effect on a European site for the reasons listed in the response, and policies or specific land use allocations</p>

	may avoid or reduce the effects.
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Reference	HRS0021
Respondent	Ms Isabel Macho
Organisation	Carmarthenshire County Council
Response	General: Some Latin names are not italicised and I noted one was mis-spelt. Couple of minor layout issues
Recommendation	Going forward, consider further involvement of the County Council's Ecologist in the HRA process to review documentation prior to public consultation etc.

Reference	HRS0022
Respondent	Ms Isabel Macho
Organisation	Carmarthenshire County Council
Response	Page 36: 5.2. Water Quality - Should mention that it is runoff from agriculture is a cause for nutrient input, e.g. nitrates and phosphates.
Recommendation	The input of nutrient rich run off from agriculture is known to be a main contributor to water quality eutrophication. However, the control of agricultural runoff cannot necessarily be controlled through the LDP hence it was not part of this stage of the HRA. Consider ways in which the LDP process can influence nutrient enrichment of surface waters from agriculture.

Reference	HRS0023
Respondent	Ms Isabel Macho
Organisation	Carmarthenshire County Council
Response	Page 38: First para – this should mention trampling from livestock as a specific issue.
Recommendation	The impact of disturbance focused on the potential impacts on European sites as a result of tourism and recreation. The disturbance to European sites as a result of livestock shall be taken in to consideration as the HRA/LDP process is taken forward.

Reference	HRS0024
Respondent	Ms Isabel Macho
Organisation	Carmarthenshire County Council
Response	Page 40: Last para – land clearance/development is a cause of spread of invasive species and should be listed.
Recommendation	Consider this response in the HRA/LDP process going forward.

Reference	HRS0025
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Respondent	Ms Isabel Macho
Organisation	Carmarthenshire County Council
Response	Page 50 – Table 6A: Carmarthen Regen Plan 2008–2013 Column: Effect on which European sites should include other SACs – Carmarthen Bay and Estuaries and Carmarthen Bay SPA, Mynydd Mawr and possibly others.
Recommendation	Consider that the in combination effect with the Carmarthenshire Regeneration Plan is likely to have an effect on all sites rather than just those listed in the HRA preliminary screening report.

Reference	HRS0026
Respondent	Ms Isabel Macho
Organisation	Carmarthenshire County Council
Response	Page 60 – Table 7-A: Final column may need to include Carmarthen Bay and Estuaries SAC and Burry Inlet SPA – sewerage ends up in Llanelli
Recommendation	The purpose of this table was to only set out those European sites most likely to be affected, not all of the sites affected. However, this response should be considered in the HRA/LDP process going forward.

Reference	HRS0027
Respondent	Ms Isabel Macho
Organisation	Carmarthenshire County Council
Response	Page 62 – Table 7B: Final column should include R. Teifi SAC – runs though Newcastle Emlyn
Recommendation	Table 7B page62 does not need to include the River Teifi SAC in this case as the list was only for the Growth Areas at this stage and not the Tier 2 sites (Newcastle Emlyn). However, this response should be considered in the HRA/LDP process going forward.

Reference	HRS0028
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	1 Introduction: Section 1.2, 5th bullet point – clarify what is meant by “...provide a list of those areas that require taking forward...” This should include elements of the plan/preferred strategy (strategic sites, specific policies etc.) as well as the European sites that could be affected.
Recommendation	This bullet point refers to the data set out in Table 7-A of the HRA preliminary screening report.

Reference	HRS0029
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	2 Methodology: Section 2.2, 1st bullet point – TAN 5 “Nature Conservation and Planning” was published

	in September 2009.
Recommendation	The preliminary screening report was also finalised in Sept 2009, however the updated TAN5 (Sept 2009) will be used within the HRA process going forward.

Reference	HRS0030
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	3 European Sites: Table 3-A European sites potentially affected by the Carmarthenshire Preferred Strategy. This is a reasonably comprehensive list of sites which could be affected by the Carmarthenshire Preferred Strategy. However, the “source pathway receptor” column for sites outside Carmarthenshire’ county boundary should also include increased recreational pressure for sites such as the Pembrokeshire Marine SAC. We note that this has been identified as a factor for these sites in section 4 but should also be mentioned in this table where appropriate.
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be included within the next stage of the HRA process.

Reference	HRS0031
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	4 Factors influencing the conservation status: Table 4-1 Rivers Teifi, Tywi and Cleddau; Factors influencing the Conservation status – The development on the floodplain should also include industry/economic/retail development in addition to "(housing and car parks)".
Recommendation	The use of housing and car parks in brackets was meant as an example as any development in the flood plain is considered a factor affecting conservation status. However, this response will be included within the next stage of the HRA process

Reference	HRS0032
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	5.1 Air Quality It should be noted that the critical load and level data in the Air Pollution Information System (APIS) is expressed as a maximum and minimum. The minimum figure is the level below which effects are unlikely to be significant the maximum figure being the level above which adverse effects are almost certain (depending on individual site factors). The range between the two figures is where significant effects may be present and will require further assessment and/or a precautionary approach. While this is generally an excellent analysis of the potential impacts of the Plan on air quality, the list of likely significant drivers should also include agriculture (for example, poultry and pig units and potentially intensive dairy farming) and general waste disposal in addition to the decomposition and volatilisation of animal wastes.

Recommendation	The addition of agricultural drivers on air quality will be included within the HRA process going forward.
Reference	HRS0033
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	<p>5.2 Water Quality: List of potential pressures found not to represent “significant water management issues” in the Western Wales River Basin Management Plan. This section needs to be clarified as “significant water management issues” are not the same as Likely Significant Effects as defined in the Regulations. Consequently many of the factors in the list do have the potential to have likely significant effect in the context of the N2K sites covered by the plan, and have actually been identified in later sections of the report.</p> <p>For example, “Other pollutants – Metals” could impact on the Tywi from old metal mines near Randirmwyn, Commercial shellfish harvesting and nitrate levels might have an effect in Carmarthen Bay, abstraction and low flows are likely to be an issue, to a greater or lesser extent, on all the SAC Rivers as are recreational pressures in addition to coastal and marine sites. The likely significant specific drivers should include; “Abstraction/Low flows” and “aggregate extraction” (primarily in relation to the Tywi) as additional bullet points and agricultural discharges should distinguish between “point and diffuse” sources and include reference to sediments.</p>
Recommendation	The significant water management issues were not highlighted as likely significant effects in this section, but were listed to help describe the complexity of the factors affecting water quality. The additional drivers on water quality suggested will be included in the HRA process going forward.

Reference	HRS0034
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	<p>5.3 Water Supply and Hydrology – In addition to the Dwr Cymru Welsh Water ‘Water Resources Management Plan’, the Assessment should also take account of the Environment Agency’s Review of Consents process particularly as it applies to the SAC Rivers identified in the screening process. It may be that none of Carmarthenshire’s water supply is sourced from a European site or, if it is, the site is not likely to be adversely affected by water abstractions. However, this needs to be clearly set down in the HRA and, where there is uncertainty (for example where water may be transferred between catchments), it needs to be flagged for further, more detailed, assessment. This is particularly the case with the Wye, Usk and Cleddau catchments, but may also be a consideration in the Burry Inlet SPA/Ramsar and Carmarthen Bay SAC. Depending on the nature and scale of the possible likely significant effects it may be advisable to carry out a detailed water cycle study and ensure suitable policy caveats are included. The recent West Midland Regional Spatial Strategy phase II enquiry reports provide a useful reference for appropriate wording in such instances.</p> <p>The likely significant specific drivers should include; “Flood Risk Management” as an additional bullet</p>

	point. In addition, if “aggregate extraction” is not included under water supply and hydrology then it should be considered in this section, though it could also be considered under 5.4 or even 5.5.
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0035
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	5.4 Disturbance: Housing, economic development and transport are also potential causes of disturbance in Carmarthenshire (as identified in later sections of this assessment).
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0036
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	5.5 Land take and habitat fragmentation: The likely significant specific driver for installation of infrastructure should include specific reference to “transport” and you should consider including a separate driver for “economic development”.
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0037
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	5.6 Non-native and invasive species: The likely significant specific drivers should include; “Development of contaminated sites” and “Management of the Local Authority estate” as an additional bullet points.
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0038
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	Table 5D: We are unsure what the potential impacts of the Carmarthenshire LDP are on the hydrology and water supply of the Gower Ash Woods and Commons SACs but would suggest that there may be impacts from the Plan in relation to the Carmarthen Bay SAC and SPA and Burry Inlet Ramsar sites.

Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process
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Reference	HRS0039
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	6 Potential 'in combination' effects of other plans: 6.1 National context – We recommend including the Wales Transport Plan, TAN 15 Development and Flood Risk and the new agri-environmental proposals (Glas Tir) if information is available.
Recommendation	It is not intended to amend the Preliminary Screening Report, however these additional plans and policies will be included within the next stage of the HRA process

Reference	HRS0040
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	6.2 Regional Context: Although covered in the analysis in Table 6A Catchment Flood-risk Management Plans (CFMPS) are not mentioned in this list.
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0041
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	6.3 Local context: Shoreline Management Plans (2000) should include reference to the current Plans (SMP2) in development. Additional Plans which should also be considered include the Pembrokeshire Coast National Park Authority Management Plan and LDP (the latter already included in table 6A); Western Valleys Strategic Regeneration Framework. You should also include any major project development proposals in and around the plan area (power stations, renewable energy developments, ports, major industries, new mineral extractions, road schemes etc.) which are not otherwise covered in the above plans.
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0042
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	<p>Table 6A – Include the following under “Possible ‘in combination’ effects”:</p> <ul style="list-style-type: none"> • Wales Spatial Plan – increased water supply demands and hydrology • Rural Development Plan – Changes to traditional farming practices (could lead to abandonment etc.) • Micro Generation Action Plan – Could also include local/medium scale Combined Heat and Power (CHP) installations with potential localised air quality impacts. Disturbance effects could also impact on designated fish species as well as bird features. • Draft Water Resources Management Plan – add “subject to the Environment Agency’s Review of Consents process” to main paragraph. • SWWITCH RTP – include direct/indirect habitat loss/fragmentation • South Wales Regional Aggregates Working Party – Regional Technical Statement 2008 – Need to include direct/indirect habitat loss/fragmentation • Carmarthenshire Priorities for Transport 2009-2014 (2009) – include direct/indirect habitat loss/fragmentation to resulting effects • Ceredigion LDP – include increased water supply demands and hydrology • Pembrokeshire LDP – include increased water supply demands and hydrology • Pembrokeshire Coast NPA LDP – include increased water supply demands and hydrology • Powys LDP – include increased water supply demands and hydrology • Swansea LDP – include increased water supply demands and hydrology • Neath Port Talbot – include increased water supply demands and hydrology • Relevant CFMPs – The CFMP action plans cover a much wider remit than “flood defence proposals” and should be considered accordingly. Effects on hydrology can impact on a number of European features in addition to raised bogs, such as wet woodlands, wet heaths and marshy grasslands.
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0043
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	<p>Include the following under European sites:</p> <ul style="list-style-type: none"> • Draft Water Resources Management Plan - Add Rivers Wye and Usk • Walking and cycling Strategy for Wales - While we accept that there are unlikely to be many significant effects we are unsure why this list has been limited to the 4 sites identified? • Carmarthen Regeneration Plan - Add Carmarthen Bay and Burry Inlet sites and potentially consider Rivers Wye, Usk and Cleddau if there are water resource issues.

	<ul style="list-style-type: none"> • Carmarthen Priority for Transport - Add Carmarthen Bay and Bury Inlet sites • Carmarthen Bay SMPs - Add Tywi, Carmarthen Bay Dunes and Limestone Coasts of South West Wales • Rights of Way improvement Plan - While we accept that there are unlikely to be many significant effects we are unsure why this list has been limited to the 4 sites identified? • Powys LDP -Add Tywi • Swansea LDP - Add Usk, Wye and Tywi, Gower Commons, Carmarthen Bay Dunes and Limestone Coasts of South West Wales • Neath Port Talbot - Add Usk, Wye and Tywi • Teify Estuary Management Plan - Add Pembrokeshire Marine • Severn RBMP - include the River Usk • Relevant CFMPS - Several other sites were considered in the specific HRAs for these plans and should be included in this assessment where relevant. • Suggest also include TAN 15 (Flood Risk) and 18 (Coastal Development), and draft Shoreline Management Plans 2 (SMP2) in this table.
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0044
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	<p>Table 7A Strategic sites</p> <ul style="list-style-type: none"> • Sites 1 & 2 – Consider adding Usk, Wye and Cleddau in terms of water supply and hydrology and Burry Inlet in terms of potential water quality and disturbance impacts on the SPA/Ramsar features Sites 3 & 4 – Consider adding Carmarthen Bay Dunes, Tywi, Usk, Wye and Cleddau in terms of water supply and hydrology, Pembrokeshire Marine in terms of disturbance and possibly the Gower sites in terms of Air Quality impacts. • Site 5 – Consider adding Carmarthen Bay Dunes, Burry Inlet in terms of potential water quality and disturbance impacts on the SPA/Ramsar features and possibly the Gower sites in terms of Air Quality impacts. • Site 6 - Consider adding Usk, Wye and Cleddau in terms of water supply and hydrology and Carmarthen Bay and Burry Inlet in terms of potential water quality and disturbance impacts on the SAC/SPA/Ramsar features
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0045
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	<p>Table 7B Strategic Policies</p> <ul style="list-style-type: none"> • SP2 – The Assessment may wish to consider potential impacts of renewable energy schemes both small scale developments (micro hydro, community CHP etc.) and the implications of larger developments within TAN 8 SSAs but close to European sites. • SP3 - Consider adding Usk, Wye and Cleddau in terms of water supply and hydrology and the Carmarthen Bay Dunes. Individual site assessments should be carried out on allocations as appropriate (for example, depending on the likelihood of a particular allocation being included in the Plan). • SP4 - See also comments on Table 7A • SP5 - Consider adding Usk, Wye and Cleddau in terms of water supply and hydrology and Carmarthen Bay and Burry Inlet in terms of potential water quality and disturbance impacts on the SAC/SPA/Ramsar features • SP9 – Consider direct species impacts on SAC species features (bats and bird species) • SP11 – Consider direct species impacts on SAC species features (bats and bird species)
Recommendation	It is not intended to amend the Preliminary Screening Report, however this response will be considered within the next stage of the HRA process

Reference	HRS0046
Respondent	Kerry Rogers
Organisation	Countryside Council for Wales
Response	8 Conclusions: CCW welcomes the recommendations and the strongly precautionary approach set out in this section and fully supports the measures set out under the seven bullet points.
Recommendation	None required