

Appendix 1: Consultation Commentary

Date	Consultee	Consultee Comments	Response (record of amendment to HRA)
09/01/09	CCW	1.9: When further information is available, clarification would be welcomed as to whether this HRA process will be subject to wider public consultation.	The reports of the Habitats Regulations Screening and Appropriate Assessment will be made available as part of the wider public consultation on the Local Development Plan
		3.5 Clarification would be welcomed as to whether the allocation for 938 houses includes allocations held over from the UDP or whether this is a wholly new allocation.	The 971 dwellings proposed in the LDP is in addition to land already with planning permission - 387 dwellings.
		3.9 CCW is disappointed that no justification or explanation has been given for the discounting of 10 European sites from this screening process i.e. <ul style="list-style-type: none"> ■ Cardigan Bay SAC ■ Cleddau Rivers SAC ■ Gweunydd Blaencleddau SAC ■ Limestone Coast of South West Wales SAC ■ North Pembrokeshire Woodlands SAC ■ Preseli SAC ■ River Teifi SAC ■ Castlemartin Coast SPA ■ Grassholm SPA ■ Skokholm and Skomer SPA 	Justification is now provided within Section 3 of the AA Report.

		In order for CCW to properly consider whether the Pembrokeshire Coasts National Park LDP may, in combination with other plans and projects, have any significant effect on the above 10 sites, further information/justification should be provided	
		3.10 Recreational Pressure: CCW would suggest that specific reference should be made to issues relating to cetaceans and marine mammals.	Cetaceans and marine mammals have been considered in the AA if they are designated as Annex II species or are important to the integrity of the N2K site.
		Water Abstraction: When available, reference should be made to Dwr Cymru/Welsh Water Water Resource Management Plan. In particular, demand for water supply/abstraction and water management options will need to be considered in the context of predicted climate change (e.g. anticipate increased drought in Summer). It should also be noted that there is currently a ground water abstraction licence exemption in the south of the County, which includes an area where direct abstraction from the groundwater (aquifer) occurs without the need for EAW licence. This may be having an impact of the Pembrokeshire bat sites and Bosherton lakes SAC, since the lakes are fed (in part) by aquifer. Policies that may lead to development which would include further abstraction of this sort may therefore have a likely significant effect on the SAC and should be considered.	Welsh Water's draft Water Resource Management Plan and Drought Plan are included within Appendix 3 and are considered, where relevant, within the AA data proformas (Appendix 7). Noted and considered within Appendix 7.
		Habitat Fragmentation: We recommend that this is amended to read habitat loss and fragmentation. We have noted that within the various screening annexes, habitat loss/fragmentation, particularly in relation to the Pembrokeshire bat Sites and Bosherton lakes SAC is not often identified as a likely impact. We believe that this should be revisited, since Greater Horseshoe bats have a large range and loss or fragmentation of	Noted and amended. The Screening assessment focussed on allocations and policies that have the potential for significant effects in areas that are in close proximity to maternity and roost sites. The AA has considered the wider

		foraging habitat or flight routes may result in likely significant effects.	implications of development on habitat loss and fragmentation within Pembrokeshire.
		3.12 Reference has not been made to any relevant 'project' in the context of potential in combination effects. When available, reference should be made to relevant Water Resource Management Plans, Drought Management Plans and Catchment Flood Management Plans and to any relevant Review of Consent processes. Reference should also be made to the Wales Transport Plan and Strategy and to the Wales Freight Strategy.	Appendix 3 (Plans and Programmes Review) contains all the plans and programmes considered in-combination. The AA data proformas (Appendix 7) also reference the relevant in-combination plans and programmes.
		3.17 CCW would suggest that development proposed in Carmarthenshire's developing LDP should also be taken into account in respect of 'in combination' effects. CCW agrees that further information is required regarding diffuse pollution and, in particular, capacities of WTW and sewerage systems in the Carmarthen Bay region (both within and outwith this LDP area). When available, reference should be made to the Dwr Cymru/Welsh Water Water Resource Management Plan. Consideration should also be given to recreational pressures on this European site e.g. bait digging, water based recreation etc.	Development within Carmarthenshire has been considered in relation to in-combination effects on Carmarthen Bay and Estuaries SAC and Carmarthen Bay SPA. Recreational pressures on this site were considered during the screening in the likely significant effects screening assessment (Appendix 6).
		3.18/3.19. Clarification would be welcome as to whether induced recreational pressure/disturbance (from new housing) might be considered significant for this European site.	Recreational disturbance is not considered to be a significant issue in relation to maintaining site integrity.
		3.21 CCW agrees with the findings of this screening exercise with respect to the Pembrokeshire Bat Sites and Bosherton Lakes SAC.	Noted.
		3.22	The AA has focussed on Annex II species

		CCW would suggest that specific consideration should also be made to issues relating to cetaceans and to marine dependent birds.	designated as part of the Pembrokeshire Marine SAC.
		3.25 See comments above on 3.17	See response to comment 3.17.
		<p>Table 7. In principle, CCW agrees with the findings of this screening exercise and agrees that additional consideration (appropriate assessment) needs to be undertaken in respect of</p> <ul style="list-style-type: none"> ■ Carmarthen Bay SPA/Carmarthen Bay and Estuaries SAC ■ North West Pembrokeshire Commons SAC ■ Pembrokeshire Bat Sites and Bosherton Lakes SAC ■ Pembrokeshire Marine SAC ■ St David's SAC ■ Ramsey and St David's Peninsula Coast SPA <p>See comments on 3.9.</p>	Noted.