

Appendix 3: SA/SEA Initial Report – Representations Received

Organisation/Comment	Response/Action
Natural Resources Wales – Sharon Luke	
General Comments	
<p>We consider that Carmarthenshire’s landscape objective SA 9 links to a greater number of the strategic objectives that defined in Figure 3: Testing of Revised LDP Strategic Objectives against the Sustainability Objectives framework.</p>	<p>Noted. The landscape objective has been reassessed against the strategic objectives and has been linked to all relevant objectives.</p>
<p>Figure 4: Testing of Strategic Growth Options against the sustainability Objectives framework (Page 21). We consider there could be a direct link between growth options and SA9 Landscape. We anticipate that there could be effects e.g. an increased need for greenfield land and pressure on landscapes in a similar way to effects on SA2. There may be potential to mitigate these effects.</p>	<p>Agreed. The figure and supporting text has been amended to reflect impacts of Growth Options on SA2 – Biodiversity.</p>
<p>Section 4.2.1. We note the final bullet point acknowledges the potential to impact negatively on landscapes and cultural heritage.</p>	<p>The paragraph states that all growth has the potential to impact on landscape depending on the selection of sites and implementation of development (e.g. in terms of place making and design, materials used etc.). At the strategic level of detail provided by the preferred strategy is it difficult to say whether there will be negative impacts or not. However, at the deposit stage, there will be more detail on the allocated sites and their landscape context on which to make an assessment.</p>
<p>Figure 7 Testing of Revised LDP Strategic Policies against the Sustainability Objectives framework. We consider some additional strategic policies could have a negative effect on landscape e.g. SP3 and SP6, in a similar way as for biodiversity.</p>	<p>Agreed and amended to more closely reflect the potential impacts on SA2 – Biodiversity.</p>
<p>Figure 8 (page 102) Summary of Sustainability Appraisal of Preferred Strategy. We are not comfortable with the position that the preferred strategy has no negative effect on landscape.</p>	<p>Figure 8 is a summary of all previous sustainability appraisals carried out in the document. It does not conclude that there are no negative effects on Landscape, and highlights some potential issues for conflict including SP8, SP12, SP18 and SP19, as well as areas of uncertainty or areas where further information or detail may be required. This figure has now been amended to reflect changes made in other sections of the document as a result of</p>
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	NRW's comments.
Table 8 (page 106) Draft Sustainability Monitoring Framework refers only to Special Landscape Areas in relation to landscape, whereas Appendix 2 Data sources (page 117) refers to the number of developments refused in design grounds and the number approved on previously developed land. We ask for clarification as to the monitoring method used for landscape.	Noted, the additional monitoring data sources have been added to Table 8 to provide a more robust method of monitoring landscape.
Pembrokeshire Coast National Park - Martina Dunne	
Comments on Appraisal of the LDP Strategic Options and Alternatives:	
Spatial Options, appraisal against SA Objective 5. Mitigation for this is effectively now a legislative requirement. SuDS are required for new development under the Flood and Water Management Act (2010). As well as providing mitigation for flash flooding SuDS collect, filter and slowly release water back into the environment.	Agreed, with SuDS now in place, this mitigation is now a legislative requirement and this will be considered as such in the deposit plan.
Comments on Appraisal of LDP Strategic Policies:	
SP6 Employment and the Economy, assessments against SA4. Caveat with "but an increase in industry related traffic as per the commentary on air quality under SA3?"	Agreed. Will add in reference to industry related traffic.
General Comments	
On the whole a very balanced assessment, PCNPA support all of the changes to policy suggested by the SA.	Noted.
Missing update/re-issued review of plans and programmes and baseline information. The PPP currently available on the website is missing the adopted Local Development Plans for Pembrokeshire Coast National Park and Pembrokeshire County Council.	Noted. Will amend deposit plan to include missing LDPs for Pembrokeshire Coast NP and Pembrokeshire CC.
Suzy Erskine	
General Comments	

2.2.4 The 15 SA Objectives that make up the framework include: ☐ SA2 Biodiversity SA3 Air Quality SA4 Climactic Factors SA5 Water SA7 Soil ☐ SA9 Landscape ☐ SA12 Health and Well-being SA13 Education and Skills SA14 Economy SA15 Social Fabric Regarding the above: Biodiversity is not just about green tourism. If we are to be truly sustainable we could start growing a wider diversity of crops in Wales. Currently only a tiny percentage of farm-land is used for market gardens or fruit trees. We could be growing our own food here and increasing the biodiversity as a result as well as improving the resilience of our local economy and improving people's health. Please let's plant more trees for wildlife, holding water in the soil and enjoying cleaner air. Sheep have been allowed to keep the hillsides bare for so long most people believe that's how they should look. Not so! With trees on the hillsides, our villages won't be flooding, because the trees take up the water and hold on to the soil.

Noted. These are all valid comments which will be considered in the SA of the deposit plan.