

Revised 2018-2033 Local Development Plan

Habitats Regulations Assessment 2nd Addendum Report

2nd Deposit Plan
October 2023

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Abbreviations

(r)LDP	(revised) Local Development Plan
AoS	Area of Search
CBEEMS	Carmarthen Bay and Estuaries European Marine Site
HRA	Habitat Regulations Assessment
LSA(s)	Local Search Area(s)
NRW	Natural Resources Wales
P	Phosphorous
SAC(s)	Special Area(s) of Conservation
SNCB	Statutory Nature Conservation Body
SPA(s)	Special Protection Area(s)
WwTW	Wastewater Treatment Works

1. Introduction

- 1.0.1 Carmarthenshire County Council is preparing a 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. Over the course of the preparation of the rLDP, which has undergone several iterations, the accompanying Habitats Regulations Assessment (HRA) has been carried out in an iterative and integrated manner as part of the plan making process since 2018.
- 1.0.2 The scope of the present HRA is to ensure that all allocations for proposed development contained within the 2nd Deposit rLDP¹ have been duly considered in terms of their potential impact upon the National Site Network. This *HRA 2nd Addendum* (October 2023) expands upon the findings and recommendations made by the *HRA Addendum*² (February 2023), *HRA Report*³ (December 2020) and an earlier, informal *HRA Screening Report*⁴ of the Preferred Strategy (December 2018), which are required under *The Conservation of Habitats and Species Regulations (as amended) 2017* (hereinafter referred to as the Regulations)⁵.
- 1.0.3 Where appropriate, the present document contains excerpts of, and cross references to, the above-mentioned assessments. Effort has been made to avoid the repetition of supplementary text which is not fundamental to the rationale and conclusions here made. This is to give an accessible and transparent record of the assessment of the rLDP throughout its preparation, under the Regulations. Nevertheless, the present document should not be considered in isolation and signposting to earlier HRA effort has been provided accordingly.
- 1.0.4 The publication of new guidance in addition to emerging evidence base has subsequently resulted in the alteration in previous HRA effort (further noted in text as superseded).

Regulation 19 Consultation Response

- 1.0.5 Natural Resources Wales, as the Statutory Nature Conservation Body (SNCB), was consulted upon and provided comments on both the rLDP and the HRA⁶. In their response dated 14th April 2023, it advised that additional clarification would be needed to justify the conclusion of the *HRA Addendum* (Feb 2023) (i.e., with appropriate certainty and beyond reasonable scientific doubt) that the rLDP will not have an adverse effect on the integrity of riverine SACs.

¹ [Carmarthenshire County Council / Cyngor Sir Gâr - Second Deposit LDP \(oc2.uk\)](#)

² [2nd Deposit Revised Local Development Plan HRA Addendum. February 2020.](#) As amended Appendix A.

³ [Revised Local Development Plan HRA Report. January 2020.](#) As amended by the HRA Addendum, Appendix A.

⁴ rLDP HRA Screening Report of the Preferred Strategy. December 2018.

⁵ [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](#)

⁶ Please find all responses within the Consultation Report. October 2018.

1.1 Work Undertaken in Preparation for Submission.

- 1.1.1 In light of NRW comments and the emerging nature of associated guidance and ongoing works, a summary of evidential developments which have been undertaken since the publication of the *HRA Addendum* is provided below. Additionally, a schedule of alterations made to the *HRA Addendum* is further provided in Appendix A.
- 1.1.2 A Statement of Common Ground⁷ between neighbouring Local Planning Authorities, NRW, and Dŵr Cymru has been prepared to address uncertainties related to cross-catchment collaboration. Regard to the location of future development and its associated mitigation is also made to ensure that no further detriment, whether alone or in-combination, arises from future development. Additionally, it is understood that, while their terms of reference have yet to be adopted, the Nutrient Management Board for each respective SAC catchment will also provide further certainty regarding the deliverability of cross-border mitigation measures (and benefit sharing thereof). Once operational, the cross-nature partnership within the Nutrient Management Boards will facilitate information sharing between the affected Local Planning Authorities and an agreed approach to their respective permissions process, ensuring that further development does not contribute towards a net increase in phosphorous pollution throughout each affected SAC.
- 1.1.3 As detailed within version 3.1 of advice from NRW⁸, there has been an ongoing Review of Permits of existing wastewater treatment works (WwTW)⁹ within SAC catchments throughout Wales. Whilst all reviewed permits would have been subjected to a project-level HRA against the revised phosphorus targets, it continues to be recognised that it is not feasible to rely upon the conclusions of those with extant permissions. A collation of those WwTW with a revised permit can be found in the Topic Paper¹⁰. Additionally, it may now be possible to condition the timing of development through Grampian Conditions to correspond with the delivery of improvements to WwTW made by Dŵr Cymru, as scheduled under their appropriate Asset Management Plan. However, in light of the continued emergence and localised spatial nature of these factors, it is anticipated that further details will be included within Supplementary Planning Guidance.
- 1.1.4 A dedicated Topic Paper on Phosphorus has been prepared to support the evidence base of the rLDP. It summarises the work undertaken by Carmarthenshire County Council to inform the development of measures to mitigate the adverse effects associated with P sensitive SAC catchments. Additionally, it discusses the implication of evidential changes which have been published since the *HRA Addendum* (i.e., the recent source apportionment report¹¹ by NRW and Dŵr Cymru which indicates that 83% of the phosphorus pollution within the Afon Tywi SAC originates from the rural land-use sector).

⁷ Supporting Sustainable Development within Carmarthenshire by Safeguarding Phosphorus Sensitive Riverine Special Areas of Conservation (October 2023). Statement of Common Ground.

⁸ [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation.](#)

⁹ with a dry weather flow, final effluent discharge of =>20m³/day.

¹⁰ Topic Paper: Phosphorous (October 2023).

¹¹ [SAC Rivers: Source Apportionment Reports | Dŵr Cymru Welsh Water \(cymru.com\)](#)

- 1.1.5 Carmarthenshire, Ceredigion, and Pembrokeshire County Councils have worked in collaboration to revise the *Nutrient Budget Calculator* which has since been adopted across the West Wales Region¹². Based on peer-reviewed literature, this tool considers those mitigation measures which may have the capacity to remove all reasonable scientific doubt, in perpetuity, as to the effects of the rLDP allocations on the riverine SACs. Additionally, NRW have published the *Mitigation Measures Menu*¹³ which acknowledges the efficacy and reliability of a wide range of measures which have the potential to reduce nutrient input into freshwater environments. This was partly formulated on a technical review of nutrient mitigation options commissioned by Carmarthenshire County Council, which, in turn, has been reviewed upon following the publication of the *HRA Addendum*¹⁴.
- 1.1.6 The development of the *Afon Tywi and Afon Teifi Phosphorus Reduction Strategy* is ongoing to ensure alignment with the best available scientific evidence and guidance. To clarify paragraph 4.2.16 and 4.3.19 of the *HRA Addendum*, this living document will effectively build upon the Interim Action Plan and shall be first published during the examination of the rLDP. Supplementary to the scope outlined previously, this strategy will provide further confidence in regard to phasing development in accordance with mitigation delivery; mitigation situation to prevent a net increase in phosphorous pollution associated with the development; quantifying the role which other catchment-based interventions could have in addition to constructed wetlands; the long-term operation of such interventions (in accordance with the lifetime of the development) and the management of captured phosphorous; and any unforeseen modifications to the rLDP recommended by the inspectors report.
- 1.1.7 There have been no material changes to the rLDP as a consequence of these works.

¹² [West Wales Nutrient Budget Calculator](#) NB: This supersedes previous notation of the Carmarthenshire Calculator.

¹³ Mitigation Measure Menu External Version 2. Natural Resource Wales. [River pollution summit action plan | GOV.WALES](#)

¹⁴ [Ricardo \(commissioned by Carmarthenshire County Council\). Nutrient Mitigation Options Technical Review: Guidance on phosphorus mitigation options for use in Carmarthenshire. Phosphorus Mitigation](#)

2. Screening Stage

- 2.0.1 This Chapter has been prepared in accordance with the legislative requirements outlined within the *HRA Report* 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), as amended by the *HRA Addendum*. In principle, it screens previously unassessed rLDP allocations¹⁵ in response to an accidental officer error which resulted in a number of allocations not being adequately appraised. In the interest of clarity, no changes have been made to the 2nd *Deposit rLDP* since its publication for public consultation in February 2023.
- 2.0.2 According to the Joint Nature Conservation Committee Protected Sites Designations Directory, there has been no further designations (or candidate thereof) added to the National Site Network within a 15km radius of Carmarthenshire. Additionally, there has been no further publications relating to the characterisation of designated sites, conservation status, nor condition of their Qualifying Features since the *HRA Addendum*.
- 2.0.3 The screening impact pathways featured in Task 2 of the *HRA Report* (subsequently amended in paragraph 3.2.1 of the *HRA Addendum*) have been reviewed and were found to remain appropriate.

2.1 rLDP Allocations

- 2.1.1 The screening conclusions for each of the allocations against the potential effect mechanisms are summarised below in Table 1, as supplemented by site-specific commentary in Appendix B. Those allocations within a Phosphorus Sensitive SAC catchment are additionally screened within Appendix C.

¹⁵ rLDP Allocations hereinafter refers to those proposed development sites listed within Policies SG1: *Regeneration and Mixed Use Sites*, SG2: *Reserve Sites*, HOM1: *Housing Allocations*, EME3: *Employment Proposals*, and SP10: *Gypsy and Traveller Provision*.

Table 1. Summary of HRA screening of 2nd Deposit rLDP Allocations which are not featured within the *HRA Report (2020)* or *HRA Addendum (Feb 2023)*. For site-specific commentary, please refer to Appendix B. Y = Yes, allocation is identified to have a likely significant effect under this impact pathway (highlighted in grey); N = Allocation is NOT likely to cause effects under this impact pathway.

Site Reference	Name	Aquatic	Marine	Coast	Mobile Species	Recreational	Abstraction	Wastewater	Phosphates	Air Pollution	Disturbance	Screening Conclusion
PrC1/MU3	Nant y Caws Regeneration and Mixed-Use Site	N	N	N	N	N	N	N	N	N	N	Out
PrC2/GT1	Land at Penyfan, Trostre, Llanelli	N	N	N	Y	N	N	N	N	N	Y	In
PrC2/GT2	Penybryn (extension), Bynea, Llanelli	Y	Y	N	Y	N	N	N	N	N	N	In
PrC2/h20	Harddfán	N	N	N	N	N	N	N	N	N	N	Out
PrC2/MU1	Former Old Castle Works, Llanelli	Y	Y	N	Y	N	N	N	N	N	N	In
SeC20/MU1	Laugharne Holiday Park	Y	Y	N	N	N	N	N	N	N	Y	In
SeC3/h3	Llys Felin	Y	Y	N	Y	N	N	N	N	N	Y	In
SeC4/MU1	Burry Port Waterfront	Y	Y	N	Y	N	N	N	N	N	Y	In
SeC6/h2	Land between Clayton Road and East of Bronallt Road	N	N	N	N	N	N	N	N	N	N	Out
SuV1/h1	Adjacent Fron Heulog	N	N	N	N	N	N	N	N	N	N	Out
SuV16/h1	Llwynddewi Road	Y	N	N	Y	N	N	N	Y	N	Y	In
SG2/1	Former Morlais Colliery, Llangennech	Y	Y	N	Y	N	N	N	N	N	Y	In
SG2/2	Land adjacent to Silver Terrace, Burry Port	Y	Y	N	Y	N	N	N	N	N	Y	In
SG2/3	Cross Hands Employment Zone	Y	Y	N	Y	N	N	N	N	N	Y	In
SG2/4	Former Ennis Caravans, Cross Hands	Y	Y	N	Y	N	N	N	N	N	Y	In

2.1.2 In light of an additional site being screened in for phosphates (SuV16/h1), a revised compilation of all rLDP Allocations has been provided in Table 2.

Table 2. Summary of all residential rLDP Allocations screened in for likely significant effects on the integrity of Afon Teifi SAC or Afon Tywi SAC due to phosphates. This table supersedes all previous consolidations (including Table 7 featured within HRA Addendum, Appendix C). * = site is also part commitment; number is exclusive of units with extant permissions.

Phosphate Sensitive Catchment	Site Reference	Name	Units
Afon Teifi SAC	SuV38/h1	Maes y Bryn	6
	SuV37/h3	Land adjacent to Lleinau	10
	SuV37/h2	Land south of Cae Coedmor	20
	SuV39/h1	Adjacent Yr Hendre	7
	SuV33/h1	Land opposite Brogeler	5
	SuV36/h2	Land at Bryndulais	16
	SuV36/h1	Cae Pensarn Helen	6
	SeC13/h1	Adjacent Y Neuadd	10
	SuV43/h1*	Blossom Inn	5*
	SeC12/h1	Trem Y Ddol	17
	SeC12/h3	Land rear of Dolcoed	20
	SeC14/h2	Land adjacent Maescader	24
	SeC14/h1	Blossom Garage	20
	SuV35/h1	Land adjacent Arwynfa	6
Afon Tywi SAC	SuV16/h1*	Llwynddewi Road	2*
	SuV17/h1	Rear of former joinery, Station Road	35
	SuV51/h1	Land opposite Village Hall	8
	SeC16/h1	Llandeilo Northern Quarter	27
	SeC15/h2	Land adjacent to Bryndeilog, Tywi Avenue	8
	SeC17/h1	Land opposite Llangadog C.P School	16
	SeC17/h2	Land off Heol Pendref	8

2.1.3 There is also one mixed use and employment allocation situated within the Tywi SAC P Sensitive Catchment (SeC16/MU1 & SeC16/E1) however, these sites are screened out in accordance with NRW's advice¹⁶. Additionally, the rLDP also contains committed development within the respective SAC P Sensitive Catchments (much of which has

¹⁶ Version 3.1, published in August 2023. Sites contain employment, commercial and retail (i.e., non-residential and, therefore, unlikely to increase the number of overnight stays within the catchment). [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#)

already been built). Full details of screening under this impact pathway can be found within the dedicated Appendix C, with further context contained within Topic Paper¹⁷.

- 2.1.4 Reference is made to paragraph 1.4.3 of the *HRA Report* outlining that there is no requirement to effectively reassess commitments under the provisions of the Regulations, particularly where they have previously been found to be acceptable by the competent authority and in consultation with the SNCB. This approach is consistent with the Habitats Regulations Assessment Handbook¹⁸, in addition to advice published by NRW specifically concerning those situated within SAC P Sensitive Catchments¹⁹.

Effects Associated with Development: Wastewater (Updated)

- 2.1.5 This subsection must be considered in conjunction with paragraphs 3.2.70 to 3.2.80 of the *HRA Report* (as amended by Ref 27 and 28 of the *HRA Addendum*).
- 2.1.6 It should be recognised that WwTW capacity is subject to change and, therefore, the rationale originally given within the *HRA Report* for the detailed screening of individual rLDP Allocations must be reflected accordingly. Carmarthenshire County Council has continued to work closely with Dŵr Cymru to identify any capacity related concerns associated with the growth proposed by the 2nd Deposit rLDP.
- 2.1.7 Recent consultation with Dŵr Cymru has confirmed that the majority of rLDP Allocations can be accommodated by existing consents. However, capacity issues have been identified in several WwTWs (Table 3).

Table 3. WwTWs which could experience an exceedance of permitted capacity as a result of the growth proposed in the 2nd Deposit rLDP, alongside the resulting designated sites with LSE. This table supersedes Table 10 featured within the *HRA Report*, along with all specific screening summaries and commentary given for the identified rLDP Allocations. * = site is also part commitment; number is exclusive of units with extant permissions.

rLDP Allocation Site Ref	WwTW	Growth proposed above capacity	National Site Network likely affected
<p style="background-color: yellow;">Awaiting data from Dry Weather Flow and biological/hydraulic capacity assessment in order to fully assess the scale of this impact. Nevertheless, the associated conclusions are unlikely to be affected.</p>			

- 2.1.7 Notation related to the individual appraisal of rLDP Allocations against the Effects Associated with Development: Wastewater is superseded by Table 3 (i.e., Appendix 8

¹⁷ Topic Paper: Phosphorous (November 2023).

¹⁸ Part C.12. Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook, April 2021 Edition. UK: DTA Publications Limited.

¹⁹ [Advice for the review of LDPs](#) specifically states “Allocations...” (i.e., not commitments) “for developments that are proposed to be connected to a mains wastewater treatment works and have the potential to increase phosphorus loading, should be assessed...”

of the *HRA Report* and Appendix G of the *HRA Addendum*). Additionally, the summary of generic level screening under this associated impact pathway (contained in Table 14 within the *HRA Report*) is amended to reflect the above.

2.2 Other rLDP Proposals

2.2.1 In response to the reasoning given by the SNCB during previous consultation, as a precautionary measure the following proposals contained within rLDP policies have been subject to screening:

- Local Search Areas (LSAs) (Proposed under *CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas*);
- Sand and Gravel Area of Search (AoS) (Proposed under *SP 18: Mineral Resources*); and
- Gwili Railway Extension (Proposed under *TRA3: Gwili Railway*).

2.2.2 The policies in which these proposals are contained have already been screened²⁰, however the following exercise is explicitly focused upon their associated spatial component(s) as proposed on the *2nd rLDP Proposal Map and Insets Maps*²¹. Other mapped proposals such as the Cross Hands Health and Wellbeing Centre (proposed under *PSD6: Community Facilities*), Cross Hands Economic Link Road (proposed under *TRA1: Transport and Highways Infrastructural Improvements*) and the Gwili Railway Station already have extant permissions and are, therefore, considered as commitments in line with paragraph 2.1.4.

2.2.3 The screening conclusions for each of these proposals against the potential effect mechanisms are summarised below in Table 3, as supplemented by commentary in Appendix B.

²⁰ Please refer to the *HRA Report* and *HRA Addendum*.

²¹ [Second Deposit Revised Local Development Plan \(gov.wales\)](https://gov.wales/second-deposit-revised-local-development-plan)

Table 3. Summary of HRA screening of 2nd Deposit rLDP other proposals. For proposal specific commentary, please refer to Appendix B. Y = Yes, proposal is identified to have a likely significant effect under this impact pathway (highlighted in grey); N = proposal is NOT likely to cause effects under this impact pathway.

Site Reference	Name	Aquatic	Marine	Coast	Mobile Species	Recreational	Abstraction	Wastewater	Phosphates	Air Pollution	Disturbance	Screening Conclusion
A	North East of Farmers (LSA)	N	N	N	Y	N	N	N	N	N	N	In
B	Mynydd Pencarreg (LSA)	N	N	N	Y	N	N	N	N	N	N	In
C	West of Talley (LSA)	N	N	N	Y	N	N	N	N	N	N	In
Sand and Gravel	Clarbeston Road to Llanfalteg (AoS)	Y	Y	N	Y	N	N	N	N	N	N	In
TRA3/A	Gwili Railway Extension	Y	N	N	Y	N	N	N	N	N	N	In

2.3 In-Combination Effects

- 2.3.1 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 plans, programmes, and projects. This Section supplements Task 3 in the *HRA Report* and *HRA Addendum*.
- 2.3.2 All rLDP Allocations and Other rLDP Proposals hereby screened have been either assigned to a category which allows them to be screened out as they cannot undermine a sites conservation objectives (either alone or in-combination), or are deemed to have likely significant effect (LSE) alone (category I). Therefore, no further consideration of 'in-combination' effects is required.
- NB: In-combination effects are further considered within Appendix C in relation to those rLDP Allocations situated in the Afon Teifi P Sensitive SAC Catchment.

2.4 Screening Summary

2.4.1 A total of 15 additional rLDP Allocations have been screened in line with the requirement of the Regulations. In summary, ...

- **Four rLDP Allocations have been screened out the need for further assessment. These are SuV1/h1, PrC2/h20, SeC6/h2, and PrC1/MU3;**
- **11 rLDP Allocations are determined to have LSE on the integrity of National Site Network sites. Please refer to Appendix B which identifies the affected sites and associated impact pathways for each allocation; and**
- In context to rLDP Allocations, only one additional impact pathway and affected SPA supplementary to those determined within previous HRA effort has been identified. This is the **disturbance to bird resting/breeding habitat with LSE on Burry Inlet SPA Bird Assemblages through development proposed by PrC2/GT1, PrC2/GT2, PrC2/MU1, SeC4/MU1, and SG2/2.**

2.4.2 All rLDP Allocations contained with the 2nd Deposit rLDP have been rescreened against effects associated with the discharge of wastewater in line with the evidential changes informed by Dŵr Cymru. **A total of ## residential rLDP Allocations were determined to have LSE under this impact pathway. Please refer to Table 3 which identifies the affected sites.**

2.4.3 In respect of Other rLDP Proposals, on a precautionary basis the following is also screened in for Appropriate Assessment:

- **Solar LSAs with LSE on foraging grounds linked to Elenydd-Mallaen SPA Bird Assemblages²²;**
- **Impact on roosting sites and foraging area of Greater and Lesser horseshoe²³ due to mineral operations situated in the AoS, with LSE on Pembrokeshire Bat Sites and Bosherton Lakes SAC;**
- **Surface water contamination as a result of AoS and Gwili Railway Extension with LSE on CBEEMS and Afon Tywi SAC, respectively; and**
- **Disturbance to otter²⁴ features as a result of the Gwili Railway Extension with LSE on CBEEMS, Afon Tywi SAC and Afon Teifi SAC.**

2.4.4 The above screening conclusion is made alongside those within the *HRA Screening Report, HRA Report* (as amended by Appendix A of the *HRA Addendum*), and *HRA Addendum*.

²² *Falco columbarius* (Merlin), *Milvus milvus* (Red Kite), and *Falco peregrinus* (Peregrine Falcon).

²³ *Rhinolophus ferrumequinum* and *Rhinolophus hipposideros*, respectively.

²⁴ *Lutra lutra*.

3. Appropriate Assessment

- 3.0.1 This Chapter should be read in conjunction with the appropriate assessment contained with the *HRA Report* (incorporating alterations Ref 41 to 43 set out in the *HRA Addendum*), the *HRA Addendum* (as amended by Appendix A), and Appendix C.
- 3.0.2 With the exception of for the disturbance to bird resting/breeding habitat with LSE on Burry Inlet SPA, it is proposed that the mitigation measures and integrity test originally put forward within the *HRA Report*²⁵ and the *HRA Addendum* remain applicable (as amended through consultation with the SNCB and wider public) to all other LSE arisen from the rLDP Allocations. This is supplemented by the following considerations:
- i. The appropriate assessment for wastewater disposal (proposed in Table 18 of the *HRA Report*) is amended to reflect those WwTWs and affected National Site Network sites identified in Table 3. Mitigation is further considered to be embedded within the *2nd Deposit rLDP* through *CCH4: Water Quality and Protection of Water Resources*, *INF4: Llanelli Wastewater Treatment Works Catchment Surface Water Removal*²⁶, and *SP 14: Maintaining and Enhancing the Natural Environment*. Collectively, this can be relied upon to avoid adverse effects to the integrity of the National Site Network because:
 - Despite the uncertainty whether developers will fund the works themselves or rely upon *Dŵr Cymru* AMP to deliver the necessary upgrades, if funding was not secured the development would be phased or delayed until the upgrades are delivered; and
 - With reference to Paragraph 4.3.3 of the *HRA Addendum*, it is a permissible route for development proposed by the *2nd Deposit rLDP* to be conditionally approved subject to the delivery of associated infrastructure.
 - ii. With regards to the potential adverse effects identified on the Afon Tywi, Afon Teifi, Afonydd Cleddau, and Afon Gwy (Wye) SACs through increased P loading, the summary in Section 1.1 provides additional material clarity to the mitigation measures outlined in the *HRA Addendum*. Supplemented by those presented in Appendix C, it can be concluded that the proposed mitigation measures could be relied upon to prevent an adverse effect to the integrity of these riverine SACs.
- 3.0.5 Both surface water contamination as a result of AoS and Gwili Railway Extension with LSE on CBEEMS and Afon Tywi SAC, and disturbance to otter features as a result of the Gwili Railway Extension with LSE on CBEEMS, Afon Tywi SAC and Afon Teifi SAC, are seen to align with the mitigation measures and integrity test originally put forward within the *HRA Report*. As such, and following a review undertaken, these can be relied upon to avoid adverse effects on the associated National Site Network Sites.
- 3.0.6 Supplementary to the above, those remaining LSE identified in Section 2.2 for Other rLDP Proposals, in addition to disturbance to bird resting/breeding habitat with LSE on Burry Inlet SPA Bird Assemblages created by rLDP Allocations, are reviewed below.

²⁵ As amended by the *HRA Addendum*.

²⁶ Affecting those rLDP Allocations connected to Llanelli WwTW.

3.1 Incorporation of Mitigation Measures

3.1.1 Signposting is given to paragraph 4.2.1 and 4.2.2 of the *HRA Report*. Mitigation measures which might be relied upon to avoid adverse effects are considered below (Table 4) below.

Table 4. Summary of possible mitigation measures for the remaining LSE identified with the present HRA. For the entire compilation of mitigation measures which are relied upon to avoid adverse effects identified by the 2nd Deposit rLDP, reference is made to Table 18 of the *HRA Report* (as amended by Ref 42 of the *HRA Addendum*) and Chapter 4.2 of the *HRA Addendum*.

Effects	Mitigation Measures
Solar LSAs with LSE on foraging grounds linked to Elenydd-Mallaen SPA Bird Assemblages	<p>Carmarthenshire County Council supports the principle of developing renewable and low carbon energy to meet our future energy needs. The 2nd Deposit rLDP does not allocate (or contain specific detail related to) solar energy projects however, it does specify LSAs which, in principle, represent areas where this type of planning application would be permitted (subject to criteria set out in <i>CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas</i>).</p> <p>As reviewed by Natural England²⁷, Birdlife Europe²⁸ found that solar photovoltaic arrays may present particularly high risks for open habitat bird species with the potential for disturbance resulting in reduced opportunities for foraging in addition to breeding and roosting. The potential for cumulative impacts of multiple solar developments in a concentrated locality is highlighted, which could negatively affect species at the population level. Incidental evidence suggests that the collision risk created by solar panels to birds is low (but not impossible). Additionally, it is likely that infrastructure associated (e.g., powerlines) presents more of a collision risk for birds than the solar arrays themselves.</p> <p>It is proposed that the present inclusion of the following mitigative policies would be sufficient to provide the necessary confidence that the designation of LSA will not adversely affect Elenydd-Mallaen SPA Bird Assemblages:</p> <ul style="list-style-type: none"> • <i>SP14: Maintaining and Enhancing the Natural Environment</i>; and • <i>NE2: Biodiversity</i>. <p>Whilst not conditional to this conclusion, it is recommended that specific reference is given to <i>SP14: Maintaining and Enhancing the Natural Environment</i> and <i>NE2: Biodiversity</i> within the supporting text of <i>CCH1: Renewable Energy within Pre-Assessed Areas and Local Search Areas</i>.</p> <p>Nevertheless, a comprehensive project-level HRA would likely be required to assess the specific proposal and extent of any onward application received. As such, permission would not be granted unless it were to accord with <i>SP14: Maintaining and Enhancing the Natural Environment</i>. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Regulations (i.e. no alternative solutions, Imperative Reasons of Overriding Public Interest) and compensatory measures secured.</p>

²⁷ [Evidence review of the impact of solar farms on birds, bats and general ecology 2016 - NEER012 \(naturalengland.org.uk\)](http://naturalengland.org.uk), 1st Edition, March 2017.

²⁸ [BirdLife Europe \(2011\). Meeting Europe's Renewable Energy Targets in Harmony with Nature. Report by BirdLife International. Report for Royal Society for the Protection of Birds \(RSPB\).](#)

<p>Impact on roosting sites and foraging area of Greater and Lesser horseshoe due to mineral operations situated in the AoS, with LSE on Pembrokeshire Bat Sites and Bosherton Lakes SAC</p>	<p>The 2nd Deposit rLDP seeks to positively provide for the workings of mineral resources to meet local needs and also safeguarded resources from sterilisation. It does not allocate (or contain specific detail related to) proposed extraction projects however, it does specify one AoS for sand and gravel which, in principle, represent where this type of application would be supported to satisfy broader subregional requirements (subject to criteria set out in <i>SP18: Mineral Resources</i>).</p> <p>Whilst within the 10km ‘rule of thumb’ set by the National Development Framework²⁹, the AoS is outside of the ‘core sustenance zone’ determined by the Bat Conservation Trust³⁰ (3km for <i>R. ferrumequinum</i>, and 2km for <i>R. hipposideros</i>). Research on the impacts of open-pit mining on bat activity found that that loss of potential habitat within the mine site boundary may reduce bat movement because of barrier effects. At the project stage, appropriate assessments should be carried out to identify the potential for any disturbance as a result of machinery and vibration during both construction and operation (e.g., noise, light). Additionally, ecological surveying would likely be required in order to assess the likelihood of these, and indicate the presence of roosting sites and/or suitable foraging area.</p> <p>It is proposed that the present inclusion of the following mitigative policies would be sufficient to provide the necessary confidence that the designation of the AoS will not adversely affect Pembrokeshire Bat Sites and Bosherton Lakes SAC:</p> <ul style="list-style-type: none"> • <i>SP14: Maintaining and Enhancing the Natural Environment;</i> • <i>NE2: Biodiversity;</i> and • <i>PSD12: Light and Air Pollution.</i>
<p>Disturbance to resting/breeding habitat with LSE on Burry Inlet SPA Bird Assemblages</p>	<p>A project-level HRA will be required for the identified allocations as they must accord with Policy <i>SP14: Maintaining and Enhancing the Natural Environment</i>. This ensures that development that would result in unacceptable adverse environmental effects will not be permitted. This will enable the identification of effects more precisely.</p> <p>It is proposed that the present inclusion of the following mitigative policies would be sufficient to provide the necessary confidence that the identified allocations will not adversely affect Burry Inlet SPA Bird Assemblages:</p> <ul style="list-style-type: none"> • <i>SP14: Maintaining and Enhancing the Natural Environment;</i> • <i>NE2: Biodiversity;</i> and • <i>PSD12: Light and Air Pollution.</i>

²⁹ [Welsh Government NDF. HRA Rules of Thumb. August 2017](#)

³⁰ [Core Sustenance Zones Explained 04.02.16.pdf \(bats.org.uk\)](#)

4. Conclusion

- 4.1 All proposals and allocations contained within the 2nd Deposit rLDP have now been subject to screening under the Regulations. No additional impact pathway or affected National Site Network Site supplementary to those determined within previous HRA effort have been identified.
- 4.2 In respect of those issues hereby screened, and in alignment with the appropriate assessment within the *HRA Report*³¹, *HRA Addendum*, Appendix C, and alongside the considerations made within Section 1.1, **the conclusion of the present 2nd HRA Addendum is that the 2nd Deposit rLDP will have no adverse effect on the integrity of any National Site Network Site.**
- 4.3 NB: The above conclusion is consistent with that made in Chapter 5 of the *HRA Report* (as amended by Ref 41, *HRA Addendum*), the *HRA Addendum*, and Appendix C.

³¹ As amended by the *HRA Addendum*.

5. Next Steps

- 5.1 The present 2nd HRA Addendum will be subject to public consultation. Copies of all HRA documentation are available from the Forward Planning Section of Carmarthenshire County Council, 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.
- 5.2 Your views can be made online via the [Consultation Page](#). Alternatively, response forms are available upon request.

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

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

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

Please include 'HRA' within the subject line.

- 5.3 Representations must be received by the relevant date and time stated upon the Consultation Page. Comments submitted after this date may not be considered.
- 5.4 To ensure that the requirements of the Regulations are met, it will be necessary to consider all further changes to the rLDP following the examination process. Therefore, additional HRA documentation will be published at this time. Additionally, the compilation of a composite report will be later explored.

Appendices

Appendix A. Alterations to HRA Addendum

A schedule of alterations made to the *HRA Addendum* since its publication in February 2023 is presented below (updated text in red). These have either been made in response to the consultations received or are *errata*. Please note that the additional matters screened within this 2nd *HRA Addendum* are not presented below. * = Ref 1 to 53 relates to the *HRA Report* and can be found within the *HRA Addendum*, whereas Ref 54 onwards relates to amending the *HRA Addendum*. Consultation responses (i.e., HRAREP#) can be found within the Consultation Report.

Ref*	Subject	Description	Reason	Implication				
54	3.2.17	Need to explicitly state the policies under which the driver of impacts associated with the preferred growth option is more appropriately assessed under. Paragraph 3.2.17 is amended to include the following: “...through which growth will be implemented (explicitly, rLDP Allocations*).” Insert new footnote = * rLDP Allocations hereinafter refers to those proposed development sites listed within Policies SG1: Regeneration and Mixed Use Sites, SG2: Reserve Sites, HOM1: Housing Allocations, EME3: Employment Proposals, and SP10: Gypsy and Traveller Provision.	Alterations made in response to consultee (see HRAREP1).	None.				
55	Appendix E	Reasoning as above. Amended Justification & Conclusion column within Appendix E accordingly: SP1/4/7/10...through which growth will be implemented (explicitly, rLDP Allocations).”	Alterations made in response to consultee (see HRAREP2).	None.				
56	Appendix E	Revision of screening justification. <table border="1" data-bbox="383 991 1592 1201"> <tr> <td data-bbox="383 991 689 1201">SP19: Sustainable Waste Management</td> <td data-bbox="689 991 797 1201">B</td> <td data-bbox="797 991 1420 1201"> <p>This policy promotes change, but the wording of the policy includes reference to there being no significant, adverse effects upon the environment. There would be no LSE on European sites because of the implementation of this policy.</p> <p>This policy is an overarching policy which set out the general criteria for development relating to the sustainable management of waste. It cannot have any effect on a European Site. Therefore, there would be no LSE on European sites because of the implementation of this policy.</p> </td> <td data-bbox="1420 991 1592 1201">Screened Out</td> </tr> </table>	SP19: Sustainable Waste Management	B	<p>This policy promotes change, but the wording of the policy includes reference to there being no significant, adverse effects upon the environment. There would be no LSE on European sites because of the implementation of this policy.</p> <p>This policy is an overarching policy which set out the general criteria for development relating to the sustainable management of waste. It cannot have any effect on a European Site. Therefore, there would be no LSE on European sites because of the implementation of this policy.</p>	Screened Out	Contextual update.	None.
SP19: Sustainable Waste Management	B	<p>This policy promotes change, but the wording of the policy includes reference to there being no significant, adverse effects upon the environment. There would be no LSE on European sites because of the implementation of this policy.</p> <p>This policy is an overarching policy which set out the general criteria for development relating to the sustainable management of waste. It cannot have any effect on a European Site. Therefore, there would be no LSE on European sites because of the implementation of this policy.</p>	Screened Out					
57	3.2.20	Clarification in line with the above. “...further assessment. Please refer to Appendix E which indicates where implications are more clearly assessed under. Therefore, the amendments...”	Alterations made in response to consultee (see HRAREP2).	None.				
58	Table 5	“...to each SAC catchment (rLDP Allocations).”	Alterations made in					

Ref*	Subject	Description	Reason	Implication
			response to consultee (see HRAREP3).	
59	3.2.28	Correction: Policy HOM1 Housing Allocations identifies 192 allocations sites for the provision of new homes across the County, with 116 of these 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 committed development is are not subject to screening here (reference is made to Regulation 71).	Alterations made in response to consultee (see HRAREP4).	None.
60	3.2.29	Correction: “As outlined in SAR25, there are twenty-nine allocations proposed development sites which have been added since the 1st Deposit, with twenty-five of these being commitments. ...”	Factual clarification.	None.
61	4.2.10 4.2.11	Insertion of footnote for paragraph 4.2.10 and 4.2.11 in the interest of clarity. These recommendations are made in the interest of specificity, and are not considered to impact the soundness of the plan whether subsequently heeded (or not). Regard should be had to the emerging nature of this impact pathway, the associated development in scientific understanding, and the subsequent advent of mitigative solutions and reverent guidance – factors which do not particularly align well with the typical development plan process.	Alterations made in response to consultee (see NRW letter dated 14.04.23 regarding CCH4 and INF5).	None.
62	4.2.16	Factual correction: To facilitate the delivery of development which may be affected by CCH4: Water Quality and Protection of Water Resources, CCC have prepared will prepare the ‘Afon Tywi and Afon Teifi Phosphorus Reduction Strategy’. This document will 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. It will further summarise the document sets out a range of measures, that have which will have been agreed in consultation with NRW. It is a proposed The ‘Afon Tywi and Afon Teifi Phosphorus Reduction Strategy’ are living documents that will develop during the lifetime of the rLDP, and in consultation with NRW.	As above.	None.
63	Appendix C	This assessment has now been finalised, and supersedes the draft Appendix C within the <i>HRA Addendum</i> .	Alterations made in response to	rLDP is considered to

Ref*	Subject	Description	Reason	Implication
			consultee (see HRAREP5/6/7/8).	meet the test of soundness in light of SNCB recommendations made on the HRA.
64	See description accordingly.	<p>Non substantive corrections:</p> <p>3.2.15... 'screened out screened out'</p> <p>3.3.2... 'unlikely to have a significant effects'</p> <p>3.3.4... 'With regard to rLDP Site Allocations...'</p> <p>4.2.17... 'here they are important'</p> <p>4.2.20... 'which can demonstrate not to cause the failure'</p> <p>4.3.1... 'ready in conjunction'</p> <p>While correctly screened in/out, a number of screening categorises mistakenly do not align with the justification given. For consistence, these should be altered throughout to accurately reflect those originally put forward with the HRA Report. Additionally, overall figures (i.e., X number of allocations) will need updating in line with the content provided with this current 2nd HRA Addendum. Furthermore, various linkages and references to supporting documents will also require updating in light of Section 1.1 (e.g., the Nutrient Budget Calculator).</p> <p>Whilst these terms have been used interchangeably, all reference to 'European sites' is amended to 'National Site Network sites'.</p> <p>With reference to Paragraph ## within the present HRA, rLDP Allocation proformas contained within both the HRA Report and HRA Addendum need to reflect the most up to date screening outcome under 'Effects Associated with Development: Wastewater'.</p>	Alterations made in response to consultee (see HRAREP18) in addition to officer review, and consequences of screening contained within the present report.	None.

Appendix B. Screening Commentary

rLDP Allocations

Site Ref	SuV1/h1	Name	Adjacent Fron Heulog	Cluster	1 (Tier 3)
Observations	This site has been allocated 5 residential units, although has a total of 8 units given 3 have extant permissions (as commitment, see W/39955 and W/39856). The proposed development site is approximately 9km from Afon Tywi SAC but is not spatially linked to the site. At such distances localised effects associated with proximity of development are unlikely.				
Overall Screening	Category	No likely significant effects either 'alone' or in combination with other plans and projects			
	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	(same as above)		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	SuV16/h1	Name	Llwynddewi Road	Cluster	1 (Tier 3)
Observations	This site has been allocated 2 residential units, although has a total of 8 units given 6 have been already built (as commitment, see W/38104, W/38620, W/39018, W/39068, and W/39806 for application history). Previous refusal of outline planning permission due to two reasons, one of these includes phosphates (see PL/02162 for details). The proposed development site is approximately 800m from Afon Tywi SAC, and is within the respective P sensitive catchment.				
Overall Screening	Category	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 in proximity to a water course which may result in potential effects to Tywi SAC from pollution run-off, particularly during construction phase. Nevertheless, these are thought to be unlikely given the situation and extant of the site.		Screened In
Effects on marine environment		G	None		Screened Out
Effects on the coast		G	None		Screened Out
Effects on mobile species		I	The site is adjacent to suitable otter habitat and therefore development may have potential impacts on otters from lighting, noise, and disturbance.		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	(same as above)		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 site is in proximity to a water course; however it is the other side of a railway from the site and is therefore unlikely to be used as resting/breeding habitat for otter.		Screened In

Site Ref	PrC2/h20	Name	Harddfán	Cluster	2 (Tier 1)
Observations	This site has been allocated for 6 residential units. The proposed development site is approximately 1.2km from Carmarthen Bay and Estuaries SAC. Given the situation and extent of the site, localised effects associated with proximity of development are unlikely.				
Overall Screening	Category	No likely significant effects either 'alone' or in combination with other plans and projects			
	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	The site is in the vicinity of CBEEMS, however it is separated by existing development and the site is therefore 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	(same as above)		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	SeC3/h3	Name	Llys Felin	Cluster	2 (Tier 2)
Observations	This site has been allocated 15 residential units, although has a total of 24 units given 9 have been built (as commitment, see S/36660 for reserve matters approval, and S/34146 for previous project-level HRA). The proposed development site is approximately 300m from Carmarthen Bay and Estuaries SAC. Given the situation and extent of the site, localised effects associated with proximity of development are unlikely.				
Overall Screening	Category	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 in proximity to a water course which may result in potential effects to CBEEMS with including those on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation. Nevertheless, these are thought to be unlikely as the existing surrounding developments (including rain line) separates the allocation from the water course.		Screened In
Effects on marine environment		I	(same as above)		Screened In
Effects on the coast		G	None		Screened Out
Effects on mobile species		I	The site is adjacent to suitable otter habitat and therefore development may have potential impacts on otters from lighting, noise, and disturbance.		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	(same as above)		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		I	The site is in proximity to a water course; however it is the other side of a railway from the site and is therefore unlikely to be used as resting/breeding habitat for otter.		Screened In

Site Ref	SeC6/h2	Name	Land between Clayton Road and East of Bronallt Road	Cluster	2 (Tier 2)
Observations	This site has been allocated 12 residential units, although has a total of 20 units given 8 have been previous built (commitment). The proposed development site is approximately 7km from Caeau Mynydd Mawr SAC and 1.2km from Carmarthen Bay and Estuaries SAC. At such distances localised effects associated with proximity of development are unlikely.				
Overall Screening	Category	No likely significant effects either 'alone' or in combination with other plans and projects			
	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	PrC2/GT1	Name	Land at Penyfan, Trostre, Llanelli	Cluster	2
Observations	The Gypsy Traveler Accommodation Needs Assessment outlined the additional pitches needs which, as of 2019, was 19 pitches. By 2024 this is expected to be 23, reaching 31 pitches to the end of the plan period 2033. Whilst a definite pitch allocation has not been given, this is the larger of the two proposed gypsy sites and, therefore, it is assumed that the majority of the additional needs will be met here. The proposed site is located approximately <1km from the nearest boundary of the Carmarthen Bay and Estuaries European Marine Site SAC and Burry Inlet SPA.				
Overall Screening	Category	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		I	This site may be used as habitat for resting/breeding habitat for SPA bird assemblages or otter (southernmost tip of the site is within 1km of Burry Inlet). Nevertheless, these are thought to be unlikely as existing development encompasses the site, separating it from areas of more suitable habitat.		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	(same as above)		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		I	Whilst considered unlikely, this site has been identified as being used by adjacent SPA bird assemblages and development may result in a loss of habitat.		Screened In

Site Ref	PrC2/GT2	Name	Penybryn (extension), Bynea, Llanelli	Cluster	2
Observations	The proposed site is located approximately 460m from the nearest boundary of the Carmarthen Bay and Estuaries European Marine Site SAC and Burry Inlet SPA. See observations of PrC2/GT1 regarding pitch numbers.				
Overall Screening	Category	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 in proximity to a water course which may result in potential effects CBEEMS including those on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation. Nevertheless, these are thought to be unlikely as surrounding development (gateway resort and sewage treatment works) separates the allocation from the water course.			Screened In
Effects on marine environment	I	(same as above)			Screened In
Effects on the coast	G	None			Screened Out
Effects on mobile species	I	The site is adjacent to suitable otter habitat and therefore development may have potential impacts on otters from lighting, noise, and disturbance. This site has also been identified as being used by adjacent SPA bird assemblages and development may result in a loss of habitat (as within 1km of Burry Inlet SPA).			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	(same as above)			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	PrC2/MU1	Name	Former Old Castle Works, Llanelli	Cluster	5
Observations	The proposed site is located approximately 400m from the nearest boundary of the Carmarthen Bay and Estuaries European Marine Site SAC and Burry Inlet SPA.				
Overall Screening	Category	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 potential effects to CBEEMS with including those on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation. Nevertheless, these are thought to be unlikely as the existing surrounding developments (including rain line) separates the allocation from the water course.			Screened In
Effects on marine environment	I	(same as above)			Screened In
Effects on the coast	G	None			Screened Out
Effects on mobile species	I	The site is adjacent to suitable otter habitat and therefore development may have potential impacts on otters from lighting, noise, and disturbance. This site has also been identified as being used by adjacent SPA bird assemblages and development may result in a loss of habitat (as within 1km of Burry Inlet SPA).			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	(same as above)			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	SeC20/MU1	Name	Laugharne Holiday Park	Cluster	5
Observations	Majority of site is previously developed with holiday chalets (see W/34546), sparing the northern quarter. The site is located approximately 30 meters from the nearest boundary of CBEEMS and is spatially linked to the site by a wooded slope and associated service roads.				
Overall Screening	Category	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 immediately adjacent to CBEEMS with potential effects on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation. Nevertheless, these are thought to be unlikely given the situation of the undeveloped area and the wooden slope separating it directly from the water course.		Screened In
Effects on marine environment		I	(see above)		Screened In
Effects on the coast		G	Unlikely to have a significant effect on coastal processes		Screened Out
Effects on mobile species		I	The site is adjacent to CBEEMS and could potentially be used as resting/breeding habitat for otters.		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		G	The site is outside P Sensitive SAC catchment.		Screened Out
Effects of increased development: Air Pollution		H	The majority (approximately 80%) of the proposed site is within 200m of Carmarthen Bay and Estuaries European Marine Site SAC (via River Taf). However, a HRA completed on this site concluded no likely significant effect under this impact pathway (as reviewed in 2017 although with previous ecological assessment dating back to 2011). UK National Atmospheric Emission Inventory indicates that road transport only accounts for 4.5% of Nitrogen deposition on the SAC (2018 data, spatial resolution 5km). Therefore, 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 adjacent to CBEEMS and could potentially be used as resting/breeding habitat for otters.		Screened In

Site Ref	PrC1/MU3	Name	Nant y Caws Regeneration and Mixed-Use Site	Cluster	1
Observations	The proposed development site is approximately 10km from Caeau Mynydd Mawr SAC and 8.4km from Cernydd Carmel SAC. At such distances localised effects associated with proximity of development are unlikely.				
Overall Screening	Category	No likely significant effects either 'alone' or in combination with other plans and projects			
	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	SeC4/MU1	Name	Burry Port Waterfront	Cluster	2
Observations	The site is approximately 350m from the nearest boundary of the Carmarthen Bay and Estuaries European Marine Site.				
Overall Screening	Category	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 adjacent to a water course which may result in potential effects to CBEEMS with including those on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation.			Screened In
Effects on marine environment	I	(same as above)			Screened In
Effects on the coast	G	None			Screened Out
Effects on mobile species	I	The site is adjacent to suitable otter habitat and therefore development may have potential impacts on otters from lighting, noise, and disturbance. This site has also been identified as being used by adjacent SPA bird assemblages and development may result in a loss of habitat (as within 1km of Burry Inlet SPA).			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	(same as above)			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	H	The majority of the site and accompanying road infrastructure do not run within 200m of a European Site. A small (approximately 10m) of the south most tip of the site is within the boundary, however 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	This site has been identified as being used by adjacent SPA bird assemblages (within 1km of Burry Inlet SPA) and other, development may result in a loss of habitat.			Screened In

Site Ref	SG2/1	Name	Former Morlais Colliery, Llangennech	Cluster	2
Observations	Previously Developed Land. The site is located approximately 90m from the nearest boundary of the Carmarthen Bay and Estuaries European Marine Site.				
Overall Screening	Category	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 immediately adjacent to CBEEMS (via River Loughor) with potential effects on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation.			Screened In
Effects on marine environment	I	(see above)			Screened In
Effects on the coast	G	Unlikely to have a significant effect on coastal processes			Screened Out
Effects on mobile species	I	The site is adjacent to CBEEMS and could potentially be used as resting/breeding habitat for otters.			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	G	The site is outside P Sensitive SAC catchment.			Screened Out
Effects of increased development: Air Pollution	H	Approximately 5% of the proposed site is within 200m of Carmarthen Bay and Estuaries European Marine Site SAC (via Afon Loughor). However, a HRA completed on this site concluded no likely significant effect under this impact pathway (as reviewed in 2017 although with previous ecological assessment dating back S/34071). UK National Atmospheric Emission Inventory indicates that road transport only accounts for 6.7% of Nitrogen deposition on the SAC (2018 data, spatial resolution 5km). Therefore, 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 adjacent to CBEEMS and could potentially be used as resting/breeding habitat for otters.			Screened In

Site Ref	SG2/2	Name	Land adjacent to Silver Terrace, Burry Port	Cluster	2
Observations	The site is approximately 350m from the nearest boundary of the Carmarthen Bay and Estuaries European Marine Site.				
Overall Screening	Category	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 adjacent to a water course which may result in potential effects to CBEEMS with including those on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation.	Screened In	
Effects on marine environment		I	(same as above)	Screened In	
Effects on the coast		G	None	Screened Out	
Effects on mobile species		I	The site is adjacent to suitable otter habitat and therefore development may have potential impacts on otters from lighting, noise, and disturbance. This site has also been identified as being used by adjacent SPA bird assemblages and development may result in a loss of habitat (as within 1km of Burry Inlet SPA).	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	(same as above)	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		I	This site has been identified as being used by adjacent SPA bird assemblages (within 1km of Burry Inlet SPA) and other, development may result in a loss of habitat.	Screened In	

Site Ref	SG2/3	Name	Cross Hands Employment Zone	Cluster	3
Observations	The proposed development site is approximately 900m from Caeau Mynydd Mawr SAC.				
Overall Screening	Category	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 adjacent to a water course which may result in potential effects to CBEEMS with including those on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation.			Screened In
Effects on marine environment	I	(same as above)			Screened In
Effects on the coast	G	None			Screened Out
Effects on mobile species	I	The site is within an area that contains suitable habitat for the Caeau Mynydd Mawr Marsh Fritillary metapopulation. 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	(same as above)			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	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	SG2/4	Name	Former Ennis Caravans, Cross Hands	Cluster	3
Observations	Previously Developed Land. The proposed development site is approximately 1.5km from Caeau Mynydd Mawr SAC and 2km from Cernydd Carmel SAC.				
Overall Screening	Category	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 adjacent to a water course which may result in potential effects to CBEEMS with including those on water quality from pollution run-off during the construction phase and contamination impacts on water quality during operation.			Screened In
Effects on marine environment	I	(same as above)			Screened In
Effects on the coast	G	None			Screened Out
Effects on mobile species	I	The site is within an area that contains suitable habitat for the Caeau Mynydd Mawr Marsh Fritillary metapopulation. 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	(same as above)			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	I	The proximity of the site to a water course may present risks to otter that may be in the area.			Screened In

Other rLDP Proposals

Proposal Ref	LSA/A	Name	North East of Farmers (Local Search Area)	Area	3.31 km ²
Observations	The proposed LSA is located approximately 1.2km from the nearest boundary of Elenydd-Mallean SPA. Potential installed capacity 72.9 (MW).				
Overall Screening	Category	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	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on marine environment		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on the coast		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on mobile species		I	Proposal is within 5km from Elenydd-Mallean SPA and, therefore, could pose a risk to Merlin, Red Kite, and Peregrine.		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	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Wastewater		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Phosphorous		G	Proposal is within the Tywi SAC P Sensitive Catchment, however it does not have any conceivable effect.		Screened Out
Effects of increased development: Air Pollution		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	Proposal that could not have any conceivable effect on a site.		Screened Out

Proposal Ref	LSA/B	Name	Mynydd Pencarreg (Local Search Area)	Area	0.9 km ²
Observations	The proposed LSA is located approximately 11.5km from the nearest boundary of Elenydd-Mallean SPA. Potential installed capacity 23.8 (MW).				
Overall Screening	Category	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	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on marine environment		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on the coast		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on mobile species		I	Proposal is within 18km from Elenydd-Mallean SPA and, therefore, could pose a risk to Peregrine.		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	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Wastewater		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Phosphorous		G	Proposal straddles both the Teifi and Tywi SAC P Sensitive Catchment, however it does not have any conceivable effect.		Screened Out
Effects of increased development: Air Pollution		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	Proposal that could not have any conceivable effect on a site.		Screened Out

Proposal Ref	LSA/C	Name	West of Talley (Local Search Area)	Area	0.99 km ²
Observations	The proposed LSA is located approximately 12.5km from the nearest boundary of Elenydd-Mallean SPA. Local Search Area. Potential installed capacity 30.3 (MW).				
Overall Screening	Category	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	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on marine environment		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on the coast		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on mobile species		I	Proposal is within 18km from Elenydd-Mallean SPA and, therefore, could pose a risk to Peregrine. The proximity of the proposal to a water course may present risks to otter that may be in the area (supplemented by nearby records of associated breeding sites and structures).		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	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Wastewater		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Phosphorous		G	Proposal is within the Tywi SAC P Sensitive Catchment, however it does not have any conceivable effect.		Screened Out
Effects of increased development: Air Pollution		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	Proposal that could not have any conceivable effect on a site.		Screened Out

Proposal Ref	Area of Search – Sand and Gravel	Name	Heol Clarbston i Llanfalteg / Clarbston Road to Llanfalteg	Area	803.75 ha
Observations	Proposal is located approximately 9km from the nearest boundary of Pembrokeshire Bat Sites and Bosherton Lakes SAC. In immediate proximity to Afon Rhydybennau, Daulan and Taf which are connected to Carmarthen Bay and Estuaries SAC.				
Overall Screening	Category	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 in proximity to a water course which may result in potential effects to Carmarthen Bay and Estuaries SAC from pollution run-off, particularly during construction phase. Nevertheless, these are thought to be unlikely given the situation and extent of the site.		Screened In
Effects on marine environment		I	As above.		Screened In
Effects on the coast		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects on mobile species		I	Proposal is within 16km of Pembrokeshire Bat Sites and Bosherton Lakes SAC.		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	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Wastewater		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Phosphorous		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Air Pollution		G	Proposal that could not have any conceivable effect on a site.		Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution		G	Proposal that could not have any conceivable effect on a site.		Screened Out

Proposal Ref	TRA3/A	Name	Gwili Railway Extension (northwards to Llanpumsaint)	Length	6.43km (approx. 4-miles)
Observations	Proposal is approximately 30m away from historical otter breeding structure record that may support Afon Tywi SAC populations. For clarity, the provision of a new station at Glangwili (TRA3/B) has already been built (see W/19935). Length is the combined figure for the individual proposals – 5.29km and 1.14km).				
Overall Screening	Category	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 in proximity to a water course which may result in potential effects to Afon Gwili (tributary of the Afon Tywi SAC) from pollution run-off, particularly during construction phase. Nevertheless, these are thought to be unlikely given the situation and extant of the site.			Screened In
Effects on marine environment	G	Proposal that could not have any conceivable effect on a site.			Screened Out
Effects on the coast	G	Proposal that could not have any conceivable effect on a site.			Screened Out
Effects on mobile species	I	The site is adjacent to suitable otter habitat and therefore development may have potential impacts on otters from lighting, noise, and disturbance. This is supplemented by nearby records of associated breeding sites and structures.			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	Proposal that could not have any conceivable effect on a site.			Screened Out
Effects of increased development: Wastewater	G	Proposal that could not have any conceivable effect on a site.			Screened Out
Effects of increased development: Phosphorous	G	Proposal that could not have any conceivable effect on a site.			Screened Out
Effects of increased development: Air Pollution	G	Proposal that could not have any conceivable effect on a site.			Screened Out
Effects of increased development: Disturbance, Noise and Light Pollution	G	Proposal that could not have any conceivable effect on a site.			Screened Out

Appendix C. Phosphate Assessment

NB: The following Appendix supersedes the previous draft version within the *HRA Addendum*.

Currently, awaiting this Appendix from external consultants. It will effectively update the calculation of nutrient budget loadings.