

## **Appendix 7      Draft Supplementary Planning Guidance: Caeau Mynydd Mawr. Consultation Report on Responses to the Representations Received**

### **1.0 Overview**

1.1 The Supplementary Planning Guidance (SPG) seeks to provide an elaboration and consolidation of the policies and provisions of the Revised Carmarthenshire Local Development Plan (rLDP) 2018-2033 - Deposit Draft (January 2020), most notably Policy NE4: Development within the Caeau Mynydd Mawr SPG Area.

1.2 The SPG was made available for consultation between the 29 of January 2020 and the 27 of March 2020.

### **2.0 Responses Received**

2.1 A summary of the comments received, together with responses and any actions in relation thereto, are provided below for Council's attention / ratification as appropriate.

#### **Respondent : D Rees - Butterfly Conservation**

2.2 **Rep ID CMM01:** The respondent agrees that the purpose of the SPG is clear.

2.3 **Officer Response:** Support welcomed.

2.4 **Action:** No change to the SPG.

2.5 **REP ID CMM02:** The respondent agrees that all of the relevant legislative and policy content are covered.

2.6 **Officer Response:** Support welcomed.

2.7 **Action:** No change to the SPG.

2.8 **REP ID CMM03:** The respondent agrees that the SPG is appropriately evidenced.

2.9 **Officer Response:** Support welcomed.

2.10 **Action:** No change to the SPG.

**2.11 REP ID CMM04:** The respondent states that *“Since its inception in 2013 this project has been successful in mitigating the impacts of development in the Cross Hands area on the protected Marsh Fritillary butterfly and the habitat which supports it. The project provides vital funding for work which improves the habitat for the butterfly. The Special Area of Conservation that lies at the centre of a wider area sustains one of Wales’, if not the UK’s, most important Marsh Fritillary meta populations. The butterfly functions in a meta-population – a group of local (smaller) populations connected by migrating individuals. The Marsh Fritillary requires large areas of continuous or closely connected marshy grassland in order to survive in the long term. The food plant on which the eggs are laid, and on which larvae feed is devil’s bit scabious (Succisa pratensis), these plants need to be abundant throughout the habitat in order to support the butterfly. While the Marsh Fritillary population in and around the Caeau Mynydd Mawr SAC is one of the most important in the United Kingdom it is still threatened by loss of habitat as a result of development, and also by the deterioration in the condition of its habitat due to inappropriate management. The continuation of the project is vital to the survival of this species in Wales. As the leading UK and international organisation for butterfly conservation we whole-heartedly support the new Caeau Mynydd Mawr SPG. It can only deliver even better results for both the species and the communities within”*. (general comment)

**2.12 Officer Response:** Comment noted / support welcomed.

**2.13 Action:** No change to the SPG.

**Respondent : R Killa - The Wildlife Trust of South and West Wales**

**2.14 Rep ID CMM05:** The respondent agrees that the purpose of the SPG is clear.

**2.15 Officer Response:** Support welcomed.

**2.16 Action:** No change to the SPG.

**2.17 REP ID CMM06:** The respondent agrees that all of the relevant legislative and policy content are covered.

**2.18 Officer Response:** Support welcomed.

**2.19 Action:** No change to the SPG.

2.20 **REP ID CMM07:** The respondent agrees that the SPG is appropriately evidenced.

2.21 **Officer Response:** Support welcomed.

2.22 **Action:** No change to the SPG.

2.23 **REP ID CMM08:** The respondent states that *“The Caeau Mynydd Mawr project is a fantastic example of where development can improve habitat conditions to benefit wildlife over a landscape scale area. Without the project, one of the most important strongholds of the endangered Marsh fritillary butterfly in the UK would be under threat. I fully support the increase in the project area, as it is based on sound data collated over numerous surveys. It realistically reflects the habitat needed by the Caeau Mynydd Mawr metapopulation.”*

(general comment)

2.24 **Officer Response:** Comment noted / support welcomed.

2.25 **Action:** No change to the SPG.

### **Respondent :S Philippart**

2.26 **Rep ID CMM09:** The respondent does not agree that the purpose of the SPG is clear.

2.27 **Officer Response:** Comment noted / disagree. It is considered that the purpose of the SPG is clear in that it seeks to provide specific guidance in relation to the consideration of development proposals impacting upon the Caeau Mynydd Mawr Special Area of Conservation (SAC).

2.28 **Action:** No change to the SPG.

2.29 **REP ID CMM10:** The respondent does not agree that all of the relevant legislative and policy content are covered.

2.30 **Officer Response:** Comment noted / disagree. It is considered that Section 2 of the SPG provides a full review of the legislative and policy content.

2.31 **Action:** No change to the SPG.

2.32 **REP ID CMM11:** The respondent does not agree that the SPG is appropriately evidenced.

2.33 **Officer Response:** Comment noted / disagree. It should be noted that 3 evidence papers were made available to support the consultation on the SPG. It is considered that these papers fully evidence the following key facets which underpin the SPG in evidential terms: (1) the delineation of the SPG Area; (2) the calculation of the contribution sum to be levied; and (3) the habitat management specifications and quantification of success.

2.34 **Action:** No change to the SPG.

2.35 **REP ID CMM12:** The respondent states that “*I have had land within Black lion road for several years and there has been development all around plus had planning on it previously but had expired now in conservation area*” (general comment)

2.36 **Officer Response:** Comment noted. The SPG area has been robustly defined – see reference to evidence supporting the SPG in the response to representation Rep ID CMM 11 in paragraph 2.33 above. It should be noted that the Caeau Mynydd Mawr SPG Area is not termed a ‘Conservation Area’.

2.37 **Action:** No change to the SPG.

**Respondent : L Wilberforce - Wildlife Trust South & West Wales**

2.38 **Rep ID CMM13:** The respondent agrees that the purpose of the SPG is clear.

2.39 **Officer Response:** Support welcomed.

2.40 **Action:** No change to the SPG.

2.41 **REP ID CMM14:** The respondent agrees that all of the relevant legislative and policy content are covered.

2.42 **Officer Response:** Support welcomed.

2.43 **Action:** No change to the SPG.

2.44 **REP ID CMM15:** The respondent agrees that the SPG is appropriately evidenced.

2.45 **Officer Response:** Support welcomed.

2.46 **Action:** No change to the SPG.

2.47 **REP ID CMM16:** The respondent states “*full support*”. (general comment)

2.48 **Officer Response:** Comment noted / support welcomed.

2.49 **Action:** No change to the SPG.

**Respondent : A Martin**

2.50 **Rep ID CMM17:** The respondent agrees that the purpose of the SPG is clear and states that “*It is important that this area is preserved as it contains grade 1 farmland and natural marsh areas. All of which provide biodiversity and flood constrains. As well as a natural barrier to the villages.*”

2.51 **Officer Response:** Support welcomed.

2.52 **Action:** No change to the SPG.

2.53 **REP ID CMM18:** The respondent agrees that all of the relevant legislative and policy content are covered – adding - “*As far as my knowledge goes!*”.

2.54 **Officer Response:** Support welcomed.

2.55 **Action:** No change to the SPG.

2.56 **REP ID CMM19:** The respondent agrees that the SPG is appropriately evidenced.

2.57 **Officer Response:** Support welcomed.

2.58 **Action:** No change to the SPG.

2.59 **REP ID CMM20:** The respondent states “*We need to consider our actions under the future generations and Welsh planning acts. To ensure the prosperity and enjoyment of Wales for the future*” (general comment)

2.60 **Officer Response:** Comment noted.

2.61 **Action:** No change to the SPG.

**Respondent: S Luke - Natural Resources Wales (NRW)**

2.62 **Rep ID CMM21:** The respondent states “*NE4: Development within the Caeau Mynydd Mawr SPG Area - we support the inclusion of this policy and the supporting SPG*”. (Note this was also registered as a comment in support of the Plan itself (Policy NE4) by the Council).

2.63 **Officer Response:** Support welcomed.

2.64 **Action:** No change to the SPG.

**3.0 General Matters**

3.1 It should be noted that there may be consequential amendments to the SPG not listed above which may be a result of the Council’s responses to representations made on the deposit LDP itself (notably any representations to policy ENV4).

3.2 The Council will undertake any minor editorial amendments / corrections as and where required. (note a slight amendment to paragraph 1.12 was made by officers when the deposit Revised LDP itself was subject to a further 3-week consultation).

3.3 Also, reference should always be made to the proposed focused changes of the Plan itself and it should be noted that the SPG is an evolving document in this regard.