Appendix 5 – Habitat Regulations Assessment

Responses to Representations Received

Respondent	Ref. No.	Respondent Comment	Response/Action	Implication for the Plan
Natural Resources Wales – Sharon Luke	HRA 001	2.3.1. Contains an error on the regulation	Amended accordingly. This error has been removed.	No
Natural Resources Wales – Sharon Luke	HRA 002	2.4.1. Contains an error on the legislation date.	Amended accordingly. This error has been corrected.	No
Natural Resources Wales – Sharon Luke	HRA 003	2.4. The full reference should be included for TAN 5.	The full reference for TAN 5 has been added.	No
Natural Resources Wales – Sharon Luke	HRA 004	3.1.1. We welcome the recognition that distance is not a definitive guide to the likelihood impact on a site.	Comments gratefully noted.	No
Natural Resources Wales – Sharon Luke	HRA 005	Table 3 The site names, notably Carmarthen Bay Dunes, need to be written in full for clarification.	Amended accordingly.	No
Natural Resources Wales – Sharon Luke	HRA 006	Table 3 Section 2 - Carmarthen Bay Dunes should be included as dune slacks can be impacted by hydrological and aquatic impacts.	Amended accordingly.	No
Natural Resources Wales – Sharon Luke	HRA 007	Table 3 Section 2 - Cernydd Carmel should be included in both parts as the turlough could be impacted.	Amended accordingly .	No
Natural Resources Wales – Sharon Luke	HRA 008	Table 3 Section 6 - We agree with your reasoning Cernydd Carmel does not need to be included.	Noted.	No
Natural Resources Wales – Sharon Luke	HRA 009	Table 3 Section 16 – We note your reference to the species in Section 14.	Noted.	No
Natural Resources Wales – Sharon Luke	HRA 010	Table 4 The summary of generic level screening “Identify allocations in close proximity to a watercourse that flows in/out of sites” requires amendment. We suggest: Identify allocations with	Amended as suggested.	No

		a pathway to a watercourse that flows in/out of sites.		
Natural Resources Wales – Sharon Luke	HRA 011	Table 6 You have agreed that Elenydd-Mallaen should be included for bird assemblage, but it has not been amended in the table	I think this error was with regard to the table numbering and not that Elenydd - Mallaen SPA should be added to Table 6 which deals with European sites identified as vulnerable to effects on the coast. Elenydd Mallaen has instead been added to Table 7 which details sites identified as vulnerable to effects on mobile species.	No
Natural Resources Wales – Sharon Luke	HRA 012	3.2.42. You amended this section in your reply to our comments (3.2.36) however it has not been amended in the report. We are satisfied with the amended wording noted in your reply.	Agreed and amended accordingly .	No
Natural Resources Wales – Sharon Luke	HRA 013	3.2.66. Acronym used for EA and not given in full.	Agreed and amended accordingly .	No
Natural Resources Wales – Sharon Luke	HRA 014	Table 11 Carmarthen Bay Dunes to be included as water quality could impact features such as the dune slacks and Petalwort.	Agreed and amended as suggested.	No
Natural Resources Wales – Sharon Luke	HRA 015	Table 14 The summary of generic level screening for the aquatic environment requires amendment. We suggest: Identify allocations with a pathway to a watercourse that flows in/out of sites.	Agreed and amended as suggested.	No
Natural Resources Wales – Sharon Luke	HRA 016	3.2.104. We note that the Carmarthen Bay and Estuaries European Marine Site (CBEEMS) is noted, this encompasses three marine Natura 2000 sites: Carmarthen Bay SAC, Carmarthen Bay SPA and Burry inlet SPA. CBEEMS should be defined within	Agreed. Paragraph 3.1.12 has been added at the end of Section 3.1 to make it clear that any reference to Carmarthen Bay and Estuaries European Marine Site refers to the	No

		the document. Consideration also needs to be given to Carmarthen Bay Dunes SAC in this section.	three marine Natura 2000 sites: Carmarthen Bay SAC, Carmarthen Bay SPA and Burry inlet SPA and the Burry Inlet Ramsar. Carmarthen Bay Dunes SAC has also been added and referred to subsequently in the relevant sections.	
Natural Resources Wales – Sharon Luke	HRA 017	Table 16 SP18 Mineral resources - This should not be screened out due to Cernydd Carmel SAC.	Agreed that this policy should not be screened out due to extant minerals permissions beneath the Cernydd Carmel SAC. This section has been amended accordingly and the policy considered at the appropriate assessment stage.	No
Natural Resources Wales – Sharon Luke	HRA 018	4.1.1. Consideration also needs to be given to Carmarthen Bay Dunes SAC in this section	Agreed and amended as suggested.	No
Natural Resources Wales – Sharon Luke	HRA 019	Appendix 2 The Afon Tywi SAC needs to be included.	The Afon Tywi SAC was originally omitted from this table as there is no information on critical nitrogen loads for any of its features on the Air Pollution Information System website (www.apis.ac.uk). However, to aid clarity, it has been added with the caveat that no information is available for relevant features.	No
Natural Resources Wales – Sharon Luke	HRA 020	Appendix 4 The section SP18 Mineral Resources is incomplete.	This section has now been updated and policy SP18 has been screened in.	No

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Natural Resources Wales – Sharon Luke	HRA 021	Appendix 5 INF4 Llanelli Waste Water Treatment Surface Water Disposal – We question if the screening justification should only state avoiding not reducing effects.	Agreed. This has been amended as suggested.	No
Natural Resources Wales – Sharon Luke	HRA 022	Appendix 6 Swansea, Pembrokeshire and Pembrokeshire Coast National Park LDP's need to be included.	Agreed. These have been added to Appendix 6.	No
Natural Resources Wales – Sharon Luke	HRA 023	Appendix 6 Lavernock Point to St Ann's Head Shoreline Management Plan 2 (2012) – Carmarthen Bay Dunes to be added.	Agreed and amended accordingly .	No
Natural Resources Wales – Sharon Luke	HRA 024	Appendix 8 The following sites have been screened out in the HRA however we have supplied evidence for why they should be screened in. • PrC1/MU2 Pibwrlwyd • PrC1/h12 Castell Pigyn Road,Abergwili • SeC14/h1 Blossom Garage • SeC16/h1 Llandeilo Northern Quarter • SeC16/h2 Thomas Terrace • SeC18/h3 Land adjacent to Cefn Maes • SuV60/h1 Land at College Bach	Sites have been screened in as per these comments on the evidence supplied in Annex 3. Table 17 in the main HRA document has also been amended to reflect these changes.	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 025	People Over Wind: In April 2018 the Court of Justice of the European Union handed down their judgment in the case of People Over Wind. The court ruled that it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce harmful effects on a European site. It is suggested that the HRA Screening Report should make explicit mention of the judgment and describe how the HRA is incorporating the ruling.	Noted. This reference has now been added in paragraphs 1.3.4 and 1.3.5.	No

		In our comments on the HRA for the Preferred Strategy we suggested that the People over Wind judgement should be explicitly mentioned. The response in Appendix 7 states that reference to this judgement will be included in the Deposit Plan HRA. We cannot find an explicit mention and therefore repeat the suggestion.		
Pembrokeshire Coast National Park – Martina Dunne	HRA 026	Pembrokeshire Coast National Park Local Development Plan 2: Carmarthen Bay Special Protection Area and Carmarthen Bay and Estuaries Special Area of Conservation adjoin the Pembrokeshire Coast National Park and the Pembrokeshire Coast Local Development Plan is therefore a relevant plan in Appendix 6.	Agreed. This has now been added to Appendix 6.	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 027	SP16 – update reference in column 3 “policy XX”	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 028	SP18 – column 4 appears to be incomplete.	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 029	“Bosherton” should be replaced by “Bosherston”(table headers in Appendix 1; table in Appendix 2; table in Appendix 6).	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 030	“Affects” should be replaced by “effects” where appropriate (para 2.1.1 and 2.3.5).	Amended accordingly	No

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Pembrokeshire Coast National Park – Martina Dunne	HRA 031	Para 2.4.1 “20172”	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 032	Para 3.1.1 “baring”	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 033	Should references to individual screening in “Section 3.2.2” instead refer to paras 3.2.107-3.2.111 and Table 17?	Agreed and amended accordingly .	No