Ein cyf/Our ref: CAS-237072-Q2V1

Torfaen County Borough Council
Ty Blaen Torfaen
Panteg Way
Pontypool
NP4 0LS

Dyddiad/Date: 02 November 2023

Annwyl Syr/Madam/Dear Sir/Madam,

Torfaen Replacement Local Development Plan (2022-2037)– Habitats Regulation Assessment – Scoping Report

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 13 September 2023.

We consider the European sites that should be scoped into the Habitats Regulation Assessment (HRA) of the replacement local development plan (RLDP) have been correctly identified, and the proposed approach to the HRA of the RLDP is reasonable. We provide the following comments.

Chapter 5 European Sites
We note that the incorrect Conservation Objectives for the Severn Estuary Special Area of Conservation (SAC), Special Protected Area (SPA) and Ramsar site are used within the report (footnote 30 on page 26 and 34 on page 30). The current joint advice package (agreed by Natural England and Natural Resources Wales) is here: The Severn Estuary / Môr Hafren (naturalresources.wales) and we ask that the HRA is undertaken using the Conservation Objectives detailed in this advice package.

We note that on table 1 and on page 41 there is a reference to the Wye Valley and Forest of Dean Bat Sites SAC being within 1.4 km to the north of Torfaen. However, this would appear to be an error as on page 32 it states that the closest parcel of this SAC is located 13.2km to the east of Torfaen.

The description of the nearest parts of the Usk Bat Sites SAC, refers only to Mynydd Llangatwg Site of Special Scientific Interest (SSSI). We advise that the other component SSSIs: Siambre ddu, Foxwood and Buckland Coach House & Ice House within the 15km radius are listed in the Report.

In respect of the Wye Valley and Forest of Dean Bat SAC, the closest component SSSI is Llangovan Church.

Chapter 6: Impact Pathways for Consideration
On table 3 'Potential Linking Impact Pathways' on page 35, under the Usk Bats Sites SAC and the Wye Valley and Forest of Dean SAC, we advise that the 'loss of functionally linked roost sites' should also be considered.

Under the Severn Estuary SCA/SPA/Ramsar, we recommend that the migratory fish features and sub-features of the Severn Estuary SAC and Ramsar site are considered, as functionally linked habitat in the plan area supports these diadromous fish species.

Chapter 7: Key Evidence
The **Recreational Pressures'** sections 7.2 and 7.3 (as well Chapter 8 sections 8.1-8.9) focus on the impacts to the Severn Estuary SAC and Ramsar. However, recreational activities such as canoeing, fishing, paddle boarding can be very damaging to sensitive sites such as the River Usk SAC. We advise that this is considered within the Scoping Report.

Water Quantity, Level and Flow
The most significant threat to water quantity is climate change, and this should be referenced in this section.

Water Quality
Although the main threat to water quality in Torfaen is treated sewage effluent from Wastewater Treatment Works, other potential sources of phosphorus should be referenced in this section i.e. agriculture and private sewage discharges.

We hope these comments are of assistance. If you have any queries on the above, please do not hesitate to contact us.

We will be happy to provide further advice and guidance in the latter stages of the HRA process and look forward to working with you on the replacement LDP.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Claire McCorkindale
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 65 3098

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.