

Pembrokeshire County Council Local Development Plan 2 2017-2033

# Deposit 2 Plan HRA

September 2024
(edits for Focussed Changes/Submission accepted– 17<sup>th</sup> July 2025)

#### **Foreword**

Pembrokeshire County Council commissioned Ricardo Energy and Environment (henceforth referred to as Ricardo) to provide a Habitats Regulations Assessment (HRA) for its replacement Local Development Plan Deposit Plan 2 (LDP 2, Deposit Plan 2) in November 2023.

Ricardo supplied a draft HRA to Pembrokeshire County Council on 20<sup>th</sup> March 2024. That document forms the basis for this subsequent version of the HRA document, dated 1<sup>st</sup> July 2024. Pembrokeshire County Council has completed various tasks that were pending when the draft was provided by Ricardo and has also modified other aspects of the version of the HRA supplied by Ricardo.

The formal sign-off details provided by Ricardo, immediately below, relate to their 20<sup>th</sup> March 2024 version of the document, rather than to this later version.

Nonetheless, the Council feels that it is appropriate to acknowledge the very significant contribution made to the document structure and content by Ricardo and to thank them for their considerable efforts with regard to this commission.

Accordingly, it is also appropriate to reproduce the details, below, relating to the supply of the 20<sup>th</sup> March 2024 draft by Ricardo, while acknowledging that the document has evolved through Pembrokeshire County Council inputs since that date, the product of which is this new version.

Customer:

Pembrokeshire County Council

Customer reference: PN64137

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Date: 20 March 2024

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- A. The LDP2 sets out the strategy and policy framework for the development and conservation needs of Pembrokeshire (excluding the area of National Park designation) for the period, from 2017 to 2033. The objective of this appropriate assessment is to identify any aspects of the Plan where a conclusion of no adverse effect on the integrity of 'Habitat Sites', (otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites) is not able to be reached in view of their conservation objectives, either alone or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- B. The initial Stage 1 screening identified that 21 European sites are located within 10km of the Local Development Plan Area. The European Sites are as follows:

Bristol Channel Approaches SAC	Preseli SAC
St David's SAC	Gweunydd Blaencleddau SAC
Ramsey and St David's Peninsula Coast SPA	Afon Teifi SAC
Carmarthen Bay SPA	Cardigan Bay SAC
West Wales Marine SAC	Carmarthen Bay SAC
Yerbeston Tops SAC	Limestone Coast SAC
Castlemartin Coast SPA	Carmarthen Bay Dunes SAC
Pembrokeshire Bat Sites and Bosherston Lakes SAC	Pembrokeshire Marine SAC
North Pembrokeshire Woodlands SAC	Afonydd Cleddau SAC
Grassholm SPA	Northwest Pembrokeshire Commons SAC
Skomer Skokholm and Seas of Pembrokeshire SPA	

- C. Out of the 21 European Sites within the 10km Zone of Influence, one European sites, Grassholm SPA were screened out as no allocations are planned within 10km of either site. The 20 remaining European sites were screened in.
- D. The initial policy screening (HRA Stage 1) found:
  - The Plan's introductory chapters, vision and objectives can be screened out.
  - 12 out of the 21 Strategic Policies would be Likely to have a Significant Effect (LSE).
  - 25 General Policies would be Likely to have a Significant Effect (LSE).
  - Allocations: All allocations except for two transport improvement schemes have been screened in as they would likely lead to LSE to European sites without mitigation.
  - Appendices to the Plan: The appendices can be screen out.

- E. Policies and allocations that would lead to LSE to European sites (noting that mitigation options cannot be considered at LSE stage) have been progressed to Stage 2 Appropriate Assessment.
- F. All European sites excluding Grassholm SPA will be impacted by LSE resulting from policies and allocations (Table 1.2).

Table 1.2 Summary of impact pathways resulting in LSE to European sites.

Impact Pathway	Affected Designated Site	Screened in for AA
Atmospheric Pollution	Afonydd Cleddau SAC Pembrokeshire Marine SAC North Pembrokeshire Woodlands SAC Preseli SAC	Yes
Water Quality	Afonydd Cleddau SAC (Nutrient Neutrality) Pembrokeshire Marine SAC Carmarthen Bay SAC Carmarthen Bay SPA. Cardigan Bay SAC Afon Teifi SAC Gweunydd Blaencleddau SAC North Pembrokeshire Woodlands SAC	Yes
Recreation	All sites <b>excluding:</b> Grassholm SPA, Carmarthen Bay Dunes SAC	Yes, all sites excluding those listed as exempt due to distance.
Loss of Functionally Linked Land	Pembrokeshire Marine SAC Limestone Coast SAC Gweunydd Blaencleddau SAC Preseli SAC North Pembrokeshire Woodlands SAC Pembrokeshire Bat Sites and Bosherston Lakes SAC Yerbeston Tops SAC	Yes
Disturbance	Pembrokeshire Marine SAC West Wales Marine SAC	Yes

G. On the basis of the information available to PCC, the **Stage 2** Appropriate Assessment identified that the current plan policies for Maintaining and Enhancing the Natural Environment implemented within LDP2 is insufficient and could lead to adverse effects to European site Conservation Objectives. This mitigation needs to be embedded in *SP 12 Maintaining and enhancing the Environment* and *GN 41 Protection of National Statutory Environmental Designations*. As such, adverse effects are likely to occur in respect to the impact pathways raised above –non-nutrient related water quality, recreation, disturbance, and loss of functionally linked land unless the current mitigation is strengthened to specifically address adverse effects on site integrity at the project level.

H. Additional mitigation is required to fully mitigate adverse effects on site integrity resulting from the appropriate assessment of the following Policies and all allocations except for two transport improvement schemes:

	Strategic Policy
1.	SP2: Housing requirement
2.	SP3: Affordable housing Target
3.	SP4: Gypsy, Traveller and Show-people
4.	SP5: Supporting Prosperity
5.	SP8: Regional Growth Areas
6.	SP9: Narberth Rural Town, Service Centres and Service Villages
7.	SP10: Local Villages
8.	SP11: Countryside
9.	SP12: Maintaining and Enhancing the Natural Environment
10.	SP14: Strategic Employment Provision Part 2 Allocations
11.	SP15: Safeguarding of Existing Employment Sites Part 2 Safeguarded Sites
12.	SP16: Retail Hierarchy
13.	SP17: Visitor Economy
14.	SP20: Transport Infrastructure and Accessibility

	General Policy	
1.	GN 5 Renewable Energy - Part 2 Allocations	
2.	GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)	
3.	GN 7 Cawdor Barracks including the former Brawdy Airfield	
4.	. GN 8 Employment Proposals	
5. GN 9 Employment Allocations  GN 10 Mixed-use Housing and Employment Proposals Part 1 Policy and Part Allocations		
		7.
8.	GN 12 Extensions to Employment Sites	
9.	GN 13 Residential Development	
10.	GN 16 Residential Allocations	
11.	GN 18 Slade Lane, Haverfordwest	
12.	GN 19a Maesgwynne, Fishguard	
13.	GN 19b South of Conway Drive, Castle Pill Road, Steynton –	
14.	GN 21 Exception Sites for Local Needs Affordable Housing	
15.	GN 22 Specialist and Supported Accommodation	
16.	GN 23 Specialist and Supported Accommodation Allocations	
17.	GN 24 Gypsy and Traveller Site Allocations	
18.	GN 25 Gypsy and Traveller Sites and Pitches	
19.	GN 28 Protection and Enhancement of the Historic Environment	
20.	GN 29 Community Facilities	
21.	GN 30 Community Facility Allocations	
22.	GN 31 Retail and Commercial Centre Development	
23.	GN 32 Out-of-Centre Retail and Commercial Development	
24.	GN 33 Farm Diversification	

	General Policy		
25.	GN 34 Conversion or Change of Use of Agricultural Buildings		
26.	GN 35 Marinas		
	GN 36 Transport Routes and Improvements – 2 safeguarded sites		
27.	TS/LDP2/03 Road & Footpath Well Hill improvement, Pembroke Well Hill – Pembroke & TS/LDP2/08 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Bus Station This policy has two elements.		
28.	GN 37 - Working of Minerals -allocation - MN/000/LDP2/001 Trefigin Quarry extension		
29.	GN 41 Protection of National Statutory Environmental Designations		
30.	<u> </u>		
31.	. GN 55 Serviced and Hotel Accommodation		
32.	32. GN 56 Caravan, Camping and Chalet Development		
33.	GN 57 Site Facilities on Existing Caravan and Camping Sites		
34.	GN 58 Self-Catering Accommodation		
35.	GN 59 Waste Management Facilities Part 1 Policy and Part 2 Allocations		
36.	GN 60 Disposal of Waste on Land		

- I. To mitigate the above policies, the wording of SP 12 Maintaining and Enhancing the Environment and Policy GN 41 Protection of National Statutory Environmental Designations is proposed for amendment as a plan specific caveat. in order for the plan-making body to be able to ascertain with confidence that the policy or proposal would not have an adverse effect on the integrity of a European site, it will be necessary to ensure that implementing the policy in ways that would affect the integrity of a European site would not be in accordance with the development plan.
- J. In respect to recreational impacts, existing mitigation provided by the Pembrokeshire Coast National Park Authority and partners through recreation management initiatives, is sufficient to mitigate impacts resulting from increased recreational use of European sites. As such, no adverse effect to the integrity of the Site will occur in regard to marine and terrestrial recreation.
- K. Nutrient related water quality impacts within the Afonydd Cleddau SAC and Afon Teifi SAC were found to lead to adverse effects on the aforementioned European sites. To mitigate the increase in phosphates to the Cleddau catchment, it was initially thought that all developments that may result in an increase in nutrients to the aforementioned catchments would have to demonstrate that they are nutrient neutral to satisfy the requirements of the Habitat Regulations. However, following review of Environmental Permits for WwTWs in the affected catchments, the Council is now required to consult with the water company, Dwr Cymru Welsh Water, to establish whether future developments proposed by the Plan can take place within the newly imposed limits, rather than to demonstrate nutrient neutrality. PCC has done this and the outcome has been that such capacity has been found to be available at all the WwTWs in the affected riverine catchments where new allocations (particularly for residential development) are proposed. NRW will then monitor operational compliance of the water company at the WwTWs, to ensure that the new permit limits are being adhered to. Nonetheless, the protection of river water quality remains an

important matter and this is reflected in the wording of LDP 2 policy GN 47 Water Quality and Protection of Water Resources. In some instances project level HRA may still be needed in conjunction with development proposals on allocated sites (particularly those for residential development) reflecting the need to also consider surface water disposal aspects and CSOs). By applying this current mitigation, no adverse effect will occur to the Afonydd Cleddau SAC and Afon Teifi SAC.

- L. Specific mitigation measures in relation to Policy GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales) to reflect recommendations contained in Future Wales Habitats Regulations Assessment are also set out. Mitigation measures required for the Trefigin Quarry Site allocation under Policy GN 37 are also highlighted.
- M. Due to the implementation of the mitigation measures explained above, the LDP2 will lead to no adverse effect on European Sites listed above.
- N. The need for an 'in-combination' assessment was also considered both in terms of interactions between policies and in terms of other plans and projects. There were no 'Category J'<sup>1</sup> policies identified through screening which would require further assessment of the potential for effects 'in combination'. Neighbouring authority Carmarthenshire's recent Deposit Local Development Plan 2's Habitats Regulations Assessment concluded that there would be no likely significant effect either alone or combination with other plans and projects on any European sites. Both the Pembrokeshire Coast National Park LDP2 HRA (dated September 2018) the current Ceredigion adopted LDP HRA (dated January 2020) concluded that there would be no likely significant effect either alone or combination with other plans and projects on any European sites. As detailed in the Phosphate Guidance from NRW, there has been an ongoing Review of Permits of existing Wastewater Treatment Works (WwTW) within SAC catchments throughout Wales by NRW. In accordance with the Guidance, Dwr Cymru has been consulted by the planning authority as part of Local Development Plan 2 preparation to ensure that there is capacity to treat additional wastewater arising from proposed development (i.e., proposed housing and employment allocations, planning applications currently under consideration by the planning authority (as of August 2024) and an estimate for windfall potential in the catchment area). The Pembrokeshire Coast National Park Authority and Ceredigion County Council are required to undertake similar assessments for new development proposals under their respective adopted Local Development Plans.

<sup>&</sup>lt;sup>1</sup> Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in combination.

#### 1. Introduction

#### The overall Plan

- 1. Ricardo was appointed by Pembrokeshire County Council to undertake a Habitat Regulations Assessment (HRA) of its emerging Replacement Local Development Plan (LPD2) following consultation on the First draft Deposit Plan. Since the original screening in 2020, additional guidance has been released by NRW to consider Nutrient Neutrality in all Plan and Project level HRAs where phosphate sensitive European Sites have been identified. In Pembrokeshire, the Afon Teifi SAC and the Afonydd Cleddau SAC have been identified by NRW as nutrient sensitive sites. In addition, comments received by Natural Resource Wales (NRW) on the First draft Deposit Plan highlighted the need for the LPD2 to be re-screened. The plan proposes to deliver 5840 new homes (365 dwellings / year) and create 1970 new jobs within the plan period 2017 2033.
- 2. The LDP2 sets out the strategy and policy framework for the development and conservation needs of Pembrokeshire (excluding the area of National Park designation) for the period 2017 to 2033. It sets out detailed policies and proposals for the development and use of land in Pembrokeshire and will be used by the Council to manage development, providing a basis for the consistent determination of planning applications.
- 3. The Second Deposit Plan has developed through consultation with stakeholders, County Councillors and previous consultations on Draft Issues, Vision and Objectives and Strategic Options Papers, and consultation on the Preferred Strategy and the First Deposit Plan. The vision, objectives, options, policies and allocations have been screened to determine the likelihood of any Likely Significant Effects (LSE) on European sites. The HRA area of assessment extends to sites 10km outside of the plan area, or where reason for extended scope has been identified where the LDP2 may have some effect on those sites. Although Pembrokeshire County Council consulted on a First Deposit Plan in 2020, that consultation was before the 2021 nutrient neutrality guidance² had been put in place in Wales.
- This HRA will inform a second Deposit Plan to satisfy the changes in legal guidelines and comments made by Natural Resource Wales in the first iteration of the LDP2 HRA.

<sup>2</sup> Hatton Ellis and Jones (2021) Compliance Assessment of Welsh River SACs against Phosphorus Targets. NRW Evidence Report No: 489, 96pp, Natural Resources Wales, Bangor

### Legislation Summary

- 5. Under the Conservation of Habitats and Species Regulations 2017 (as amended)<sup>3</sup>, (the 'Habitats Regulations'), any plan or project which is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary for the management of the site, must be subject to an Appropriate Assessment to determine the implications for the site integrity in view of the site's conservation objectives.
- 6. Habitats Regulations Assessment (HRA) refers to the assessment of the potential effects of a development project on one or more European sites, including SPAs and SACs. The Government also expects potential SPAs (pSPAs), candidate SACs (cSACs), and any confirmed HRA compensatory habitat to be considered in the same way.
  - Special Areas of Conservation (SACs) are designated under the Habitats
    Directive (92/43/EEC) and target particular habitats (Annex 1) and/or
    species (Annex II) identified as being of European importance.
  - Special Protection Areas (SPAs) are classified under the European Council Directive 'on the conservation of wild birds' (2009/147/EC) (the 'Wild Birds Directive') for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Directive, and migratory species).
- 7. The UK Government has also advised that Ramsar sites should be considered and included within the assessment<sup>4</sup>:
  - Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- 8. For ease of reference during HRA, these three designations are collectively referred to as 'European sites', despite Ramsar designations being at the wider international level, and are also known as 'Habitat Sites'.

#### Potentially Affected Habitat Sites

9. A total of 21 European Sites were identified within 10km of the Plan Area. The potentially affected European sites for initial screening (see **Figure 1.1**) include:

Bristol Channel Approaches SAC	Preseli SAC
St David's SAC	Gweunydd Blaencleddau SAC
Ramsey and St David's Peninsula Coast SPA	Afon Teifi SAC
Grassholm SPA	Cardigan Bay SAC
Carmarthen Bay SPA	Carmarthen Bay SAC

<sup>3</sup> Including the Conservation of Habitats and Species (Amendment) Regulations 2011 and 2012 and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

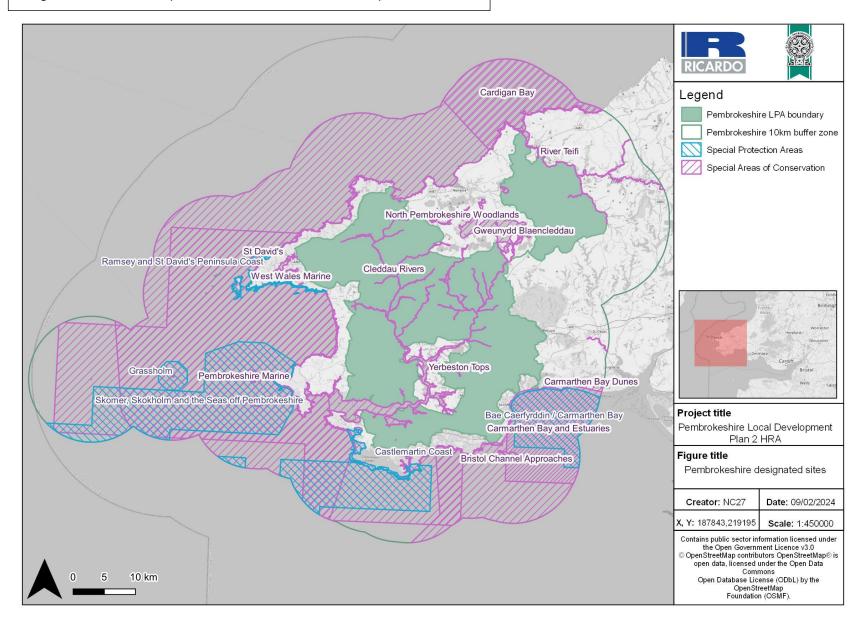
<sup>4</sup> Department for Communities and Local Government (2012) National Planning Policy Framework.

West Wales Marine SAC	Limestone Coast SAC
Yerbeston Tops SAC	Carmarthen Bay Dunes SAC
Castlemartin Coast SPA	Pembrokeshire Marine SAC
<ul> <li>Pembrokeshire Bat Sites and Bosherston Lakes SAC</li> </ul>	Afonydd Cleddau SAC
<ul> <li>North Pembrokeshire Woodlands SAC</li> </ul>	Northwest Pembrokeshire     Commons SAC
<ul> <li>Skomer Skokholm and Seas SPA</li> </ul>	

### Purpose of this report

10. The purpose of this report is to provide the necessary information to allow the Competent Authority (in this case Pembrokeshire County Council) to determine if the proposals policies and allocations within this Plan result in adverse effect on the integrity of the site(s) identified in **Section 1.3** above. A summary of the HRA process that informs this purpose is provide in **Section 2** below.

Figure 1.1 Local Development Plan Area and relevant European sites



#### 2. METHODOLOGY

#### Guidance

- 11. The approach to informing the Screening and Appropriate Assessment has been developed from the legislation described in Section 1.2 above and informed by the latest guidance for HRA in the UK, namely:
  - UK Government (2019). Appropriate assessment: Guidance on the use of Habitats Regulations Assessment [online].
  - Tyldesley, D. & Chapman, C. (2021). The Habitats Regulations Assessment Handbook [online]. DTA Publications Limited.
  - Holman et al (2019). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.0, Institute of Air Quality Management, London.
  - Natural Resource Wales (2023) Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation [online]
  - European Commission (2018). Managing Natura 2000 sites The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. European Union, 1-86.
  - SNH (2019). SNH Guidance Note: The handling of mitigation in Habitats Regulations Appraisal the People Over Wind CJEU judgement [online].
  - CIEEM (2023) Advice on Ecological Assessment of Air Quality Impacts, Version 2. Chartered Institute of Ecology and Environmental Management. Winchester, UK.
  - Welsh Government Air Quality in Wales 2020 report by Ricardo Energy & Environment.
  - JNCC (2021) Guidance on Decision-making Thresholds for Air Pollution, Chapman and Kite.

#### Context and stages of the HRA process

12. An HRA determines whether there will be any 'likely significant effects' (LSE) on any European site as a result of a plan's implementation (either on its own or 'in-combination' with other plans or projects)<sup>5</sup> and, if so, whether there will be any 'adverse effects on site integrity'<sup>6</sup>.

<sup>&</sup>lt;sup>5</sup> Also referred to as the 'test of significance'.

<sup>&</sup>lt;sup>6</sup> Also referred to as the 'integrity test'.

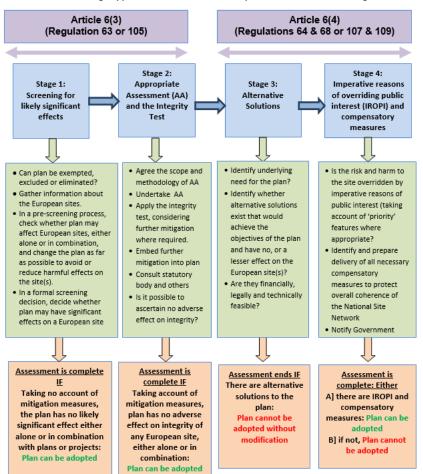


Figure F.1.1
Outline of the four stage approach to the assessment of plans under the Habitats Regulations

13. Guidance recognises four key steps in the HRA process as follows:

Stage 1 Screening – the identification of Likely Significant Effects (LSEs) of a plan or project on a European designated site either alone or in-combination. The test is a trigger for further assessment, and therefore the bar is set low i.e., is there a risk or possibility of an adverse effect. At this stage mitigation measures should not be taken into account, in accordance with the People over Wind (Court of Justice of the European Union (ECJ) Case C-323/17); this reinforces the idea of screening as a 'low bar' and makes 'appropriate assessments' more common.

Stage 2 Appropriate Assessment and the 'integrity test' – which involves closer examination of the project or plan and 'screened in' European designated sites to determine whether those sites will be subject to 'adverse effects on integrity'. The scope of such assessments is not set, and some may not be particularly detailed, especially where standard mitigation measures are available which are known to be effective. The level of assessment must be sufficient to ensure that there is no 'reasonable scientific doubt' that adverse effects on site integrity will not occur.

Stage 3 – Alternative Solutions – where adverse effects or uncertainty remain after the inclusion of mitigation in Stage 2, alternative ways where alternative solutions that meet the plan objectives are identified and consideration of their effects are

given in comparison to those in the plan. A plan or project which has adverse effects on the integrity of a European site cannot be permitted if alternative solutions are available, except where the criteria for imperative reasons of overriding public interest are met (IROPI, see Stage 4).

Stage 4 Imperative Reasons of Overriding Public Interest – where there are no alternatives that have no or lesser effects on European sites, and the IROPI criteria are met, compensatory measures are developed and secured.

#### Approach to HRA Stage 1 Screening

- 14. The screening for likely significant effects of a plan involves checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment (stage 2) of the HRA. The LSE stage enables the risks to European sites to be identified and identifies where further assessment is required in order to determine the nature and scale of potential impacts and what might be done to mitigate those impacts e.g. to avoid, reduce or eliminate. The risk is identified on the basis of a clear tangible risk, not hypotheticals. A risk should be credible and plausible.
- 15. The objective of the HRA is to establish firstly whether any of the policies or allocations included in the second deposit LDP2 are likely to have a significant effect on European sites (alone or in-combination with other plans and projects). This is done prior to any avoidance/ reduction measures being considered in compliance with People Over Wind case.<sup>7</sup>
  - For the Vision, Objectives, preferred options, policies and allocations, the assessment has considered whether there are any LSEs arising (either alone or in-combination) on one or more European sites. The HRA Stage 1 Screening process will identify whether each element (either alone or incombination with other plans or projects) is likely to have significant effects on Habitat Sites. The purpose of the screening stage is to determine whether any part of the plan is likely to have a significant effect on any European Site (including areas of compensation habitat, areas of functional land, and the ability for abstractions to occur for the management of designated wetland sites). This is judged in terms of the implications of the plan for a site's conservation objectives, which relate to its 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated<sup>8</sup>, and Ramsar criterion). Significantly, HRA is based on a rigorous application of the precautionary principle. Where uncertainty or doubt remains, an impact should be assumed, triggering the requirement for Appropriate Assessment of that scheme or plan.
- 16. The screening stage also has to conclude whether any in-combination effects would result from the various schemes within the plan itself, or from implementation of the plan in-combination with other plans and projects, and whether these would adversely affect the integrity of a European site.

<sup>&</sup>lt;sup>7</sup> People Over Wind: European Count Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018.

<sup>&</sup>lt;sup>8</sup> Annexes are contained within the relevant EC Directive.

#### **Screening of revised LDP2**

17. In order to assess the second Deposit LDP2, this HRA adopts the approach set out in Part F of the Habitats Regulations Assessment Handbook 'Practical Guidance for the Assessment of Plans'. Section F.6.3 introduces 'screening categories' against which each policy within a plan should be assessed. The screening categories are shown in **Table 2.1**.

Table 2.1 Screening categories used for high level screening of plans and policies

Category	Description	Screening Outcome
Α	General statements of policy/general aspirations.	Screen Out
В	Policies listing general criteria for testing the acceptability/sustainability of proposals.	Screen Out
С	Proposal referred to but not proposed by the plan	Screen Out
D	Environmental protection/site safeguarding policy	Screen Out
E	Policies or proposals which steer change in such a way as to protect European sites from adverse effects	Screen Out
F	Policy that cannot lead to development or other change	Screen Out
G	Policy or proposal that could not have any conceivable effect on a site	Screen Out
Н	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)	Screen Out
I	Policy or proposal with a likely significant effect on a site alone	Screen In
J	Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in combination.	Check for in- combination effects and re-categorised as K or L
K	Policy or proposal not likely to have significant effect either alone or in combination.	Screen out after in- combination test
L	Policy or proposal likely to have a significant effect in combination	Screen in after in- combination test

<sup>9</sup> https://www.dtapublications.co.uk/handbooks

Category	Description	Screening Outcome
М	Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site	Screened in

18. We will apply this method to the second Deposit LDP2 at the initial part of the screening stage. Those Plan elements that cannot have any effects on European sites can then be screened out early on (categories A to G), leaving those that have some possibility of effect (category H to L) to proceed to the final stage of screening.

#### **Identifying Habitat Sites**

- 19. The initial list of European sites for screening has been derived by adopting a distance-based threshold of 10km from the planning authority boundary, plus exceptional, longer impact pathways. The use of a '10km threshold plus exceptional pathways' approach is based on precedent set for previous HRAs of local plans through consultation with statutory consultees. It is based on the premise that most significant effects on qualifying species and habitats will occur within a maximum 10km radius of the source of impact, except where there are exceptional pathways such as major downstream or coastal dispersion effects, or larger foraging and dispersal distances for mobile species (e.g., bats, migratory fish).
- 20. In addition, the HRA Stage 1 Screening has identified any habitat outside the European site that also supports the qualifying species populations that use the European site in question. This off-site 'functionally linked land' (or sea) is particularly relevant to mobile qualifying species (e.g., birds, bats, invertebrates, fish, otters). The precautionary principle applies equally to functionally linked land, so where there is insufficient information to ascertain that there would be no LSE, an Appropriate Assessment will be required. However, this does not mean that every possible parcel of land within reach of the European site's qualifying populations must have been surveyed. The 'Boggis' case<sup>10</sup> establishes that there must be at least credible evidence that there could be a functional link between the location of option effects and the European site.

#### Sources of information

21. Data on the Habitat Sites and their interest features has been collected from the Joint Nature Conservation Committee (JNCC) and Natural Resource Wales websites. This data includes information on the attributes of the European sites that contribute to and define their integrity, current conservation status and the specific sensitivities of the site, notably the site boundaries and the boundaries of the component SSSIs; the conservation objectives; the condition, vulnerabilities and sensitivities of the sites and

<sup>&</sup>lt;sup>10</sup> Boggis and Another v Natural England: Court of Appeal, 20 Oct 2009

their interest features; the current pressures and threats for the sites; and the approximate locations of the interest features within each site (if reported); and designated or non-designated 'functional habitats' (if identified).

- 22. The following sources of published information were used:
  - Site citations.
  - Site Register Entries.
  - Conservation Objectives and Supplementary Advice on Conservation Objectives (for SPAs/SACs<sup>11</sup>).
  - Site Improvement Plans (SIPs).
  - Core Management Plans (SACs and SPAs)
  - Regulation 33 information for European Marine Sites or Conservation Advice for Marine Protected Areas<sup>12</sup>.
  - Environment Agency Review of Consents information.
  - Site condition assessment has been integrated within SSSI assessments through Common Standards Monitoring (CSM) and marine condition assessments (for SAC marine features only).
  - Definitions of Favourable Conservation Status (where available for species/habitat).
  - Article 12 (SPA) and Article 17 (SAC) status reports.
  - Site relevant Critical Load data from APIS (Air Pollution Information System)

#### **Thresholds**

- 23. The DTA HRA Handbook<sup>13</sup> provides guidance on **Table 2.2**, however the best and latest information should always be used to inform an assessment. Where possible, robust universal assumptions regarding the sensitivities of European site interest features will also be specified and applied at screening, for example:
  - wide-ranging marine / marine dependent species associated with marine sites that are not directly connected to the hydrological zone of influence are not typically considered to be both sensitive and exposed to the effects of the options (except in certain relatively unique circumstances, such as some desalination schemes).
- 24. Sites over 10km from allocations that are not hydrologically linked and which do not support wide-ranging mobile species are considered sufficiently remote such that any environmental changes will be effectively nil, and so there will be

<sup>&</sup>lt;sup>11</sup> The conservation objectives for Ramsar sites are taken to be the same as for the corresponding SACs / SPAs (where sites overlap); SSSI Favourable Condition Tables will be used for those features not covered by SAC/SPA designations.

<sup>&</sup>lt;sup>12</sup> Natural England & the Countryside Council for Wales' advice given under Regulation 33(2)(a) of the Conservation (Conservation of Habitats and Species Regulations 2017 (as amended)<sup>12</sup>

<sup>13</sup> Tyldesley, D. & Chapman, C. (2021). The Habitats Regulations Assessment Handbook [online]. DTA Publications Limited.

'no effects' on sites beyond this distance (and so no possibility of 'incombination' effects). Impact specific zones of influence include:

- Recreation: 7km
- Air Quality: 200m from nearest road that might give rise to additional traffic flows from plan provisions.(<u>Advisory Note: Ecological</u> <u>Assessment of Air Quality Impacts | CIEEM</u>)
- Nutrient inputs from increased populations: catchment specific

Table 2.2 Potential Impacts of Plans and Policies

Broad categories of potential impacts on European Site features in view of their conservation objectives, with	Examples of activities responsible for impacts
examples	(example distance considerations in italics)
Water Quality (non-phosphate discharges)	Development of infrastructure associated with increases in population.  Any development associated with an increase of population may result in an increase of nutrients such as nitrogen and phosphorous to hydrologically connected catchments.
Water Quality (construction)	Accidental release of pollutants/contaminants changing water quality related to construction or operation activities; and increased runoff and sediment entering water ways and marine environments.
Air Quality (vehicle emissions)	Increased vehicle emissions degrading/harming sensitive habitats and species
Disturbance (Recreation)	Habitat degradation due to increased foot traffic Species disturbance due to foot traffic and boat based traffic
Habitat loss or degradation	Direct habitat loss Loss/fragmentation of habitats used by qualifying features inside or outside European Sites; Introduction or spread of invasive nonnative species; Disruption of natural processes; Changes to surface and subsurface water flows; and Risk of accidental mortality of species.

Broad categories of potential impacts on European Site features in view of their conservation objectives, with examples	Examples of activities responsible for impacts (example distance considerations in italics)
Disturbance (Operational / construction)	Species disturbance via personnel, machinery, noise, and vibration.

#### **Air Quality**

Increases in emissions from roads most frequently arise as an indirect consequence of development (i.e. higher traffic flows arising from new housing/ growth). JNCC guidance (JNCC Report 696) establishes criteria for roads on the basis of the degree to which a new project contributes to the forecast increase in traffic on the road concerned.

- 25. The Screening criteria is based on the JNCC Report and DTA methodology, and a review of approaches undertaken by other local authorities in their emerging LDPs. The steps taken in screening in for further assessment are;
  - Only European sites within the zone of influence should be within scope of the HRA. For the purpose of decision making unless local circumstance support a wider zone, Plan HRA should take account of potential effects of traffic emissions on European sites located within 10km of the Plan boundary.
  - 1. Sites within 200m of any roads are initially screened in for further consideration.
  - 2. Sites with features with no inherent sensitivity to pollutants are screened out of the assessment. The question is whether there is credible evidence of a real risk to those interest features.
  - Consideration is given to the screening thresholds in JNCC guidance that
    there is credible evidence that plan policies (and an increase in Average
    Annual Daily Traffic AADT) will give rise to additional traffic flows of a
    scales such as to trigger exceedance of 1% critical levels from road
    boundaries. Where the development is of the scale set out in JNCC 2021
    Tables 5.2 and 5.3 this triggers the further consideration at AA stage.

Table 5.2: Illustration of AADT change required to trigger exceedance of 1% of critical levels as a

function of distance from the edge of a road.

Distance from Road (m)	1% of CL for NO <sub>x</sub> (30 μg/m³)	1% of CL for ammonia (1 μg/m³)	1% of CL for ammonia (3 μg/m³)
25	547	731	2,194
50	917	1,145	3,434
100	1,620	1,791	5,372
150	2,410	2,327	6,980
200	3,242	2,802	8,406

Table 5.3: Illustration of AADT increase required to trigger exceedance of 1% of critical loads for nitrogen deposition (forest vegetation and short vegetation) as a function of distance from the edge of a road.

Distance (m)	1% of CL (5 kg-N/ha/yr)	1% of CL (10 kg-N/ha/yr)	1% of CL (15 kg-N/ha/yr)	1% of CL (20 kg-N/ha/yr)		
2	Depos	sition to forest veg	getation			
25	207	415	622	829		
50	303	606	909	1,212		
100	443	887	1,330	1,773		
150	554	1,108	1,661	2,215		
200	648	1,297	1,945	2,594		
	Deposition to short vegetation					
25	359	717	1,076	1,434		
50	529	1,058	1,587	2,116		
100	780	1,561	2,341	3,121		
150	980	1,959	2,939	3,918		
200	1,151	2,302	3,453	4,604		

- Sites adjacent to minor roads, not near to any allocations (using the above scale of development) and where existing air quality is below Critical Load (CL) are likely to be screened out of the assessment. This is because any change in air quality is likely to be small scale and not generate emissions that exceed the 1% trigger exceedance for CL.
- Sites that are located near to minor roads, where traffic is not the key source
  of pollution and where air quality is not named as an issue in the
  Conservation Objectives or Site Improvement Plan are likely to be screened
  out of the assessment on the basis of no credible risk.

- Sites where eutrophication is known to come from phosphorous and strategies are in place to address this are screened out of the assessment.
- Freshwater or coastal habitats and species as not inherently sensitive to air borne pollutants are screened out of the assessment
- Sites within 200m of a road but where there are no qualifying habitats within the 200m zone of influence are screened out of the assessment.

#### In-combination assessment

- 26. In accordance with the legislation, an in-combination assessment with other relevant plans and projects should be undertaken for the policy in question. The approach to this is described as a series of steps below:
- **STEP 1** Does the Plan have <u>no discernible</u> effect, whatsoever, on the European site? If not, then there's no need for in-combination assessment, as logic dictates it can't have in-combination effects.
- STEP 2 Does the Plan, alone, have an\_adverse effect on the European site? If so, then there's no need for in-combination assessment as consent cannot be given unless the HRA Stages 3 and 4 derogation tests are met, in which case all residual effects of the Plan acting alone will be compensated for.
- STEP 3 Does this Plan have a discernible effect, but one which is not adverse (i.e. 'significant') to site integrity alone? If so, then an in-combination assessment is required. So, go the Step 4.
- STEP 4 Identify the other Plans/Projects that also have discernible effects that (1) aren't an adverse effect alone but (2) might act in combination with effects of your Plan. It is normal practice to agree this list of potential incombination Plans/Projects with the Competent Authority before doing the assessment.
- **STEP 5 –** Assess these other Plans/Projects in combination with this Plan.
- 27. The above steps recognise that effects acting alone are already dealt with for that Plan and should not form part of an in-combination assessment. It is only where effects that may *become adverse when acting in combination* that require an in-combination assessment.
- 28. Equally, in accordance with best-practice guidance, any projects or plans which have been completed, consented and implemented are considered to be part of the baseline (and should have been subject to their own HRA before being consented and implemented). Therefore, these will not be included as part of any in-combination assessment, but any ongoing operational effects will be noted as part of the baseline environment.

#### Approach to Stage 2 Appropriate Assessments

#### Consultation

29. Consultation, via meetings and correspondence, has been undertaken with Natural Resource Wales (NRW) during the first iteration of the HRA in 2018

and again during the deposit stage in 2020. Additionally, there has been discussion with Pembrokeshire County Council during the screening stage of this HRA (HRA Stage 1).

#### Impact assessment

- 30. This assessment considers the potential impact pathways of the policy or allocation with potential effects on a European site's qualifying features and likely achievement of the conservation objectives.
- 31. The potential for adverse effect on the integrity of the site depends on the scale and magnitude of the action and its predicted impacts, taking into account the distribution of the designated features across the site in relation to the predicted impact and the location, timing and duration of the proposed activity and the level of understanding of the effect, such as whether it has been recorded before and, based on current ecological knowledge, whether it can be expected to operate at the site in question.
- 32. Where qualitative and/or quantitative information is available, this has been used to inform the assessment. Where this information is not available, professional judgement has been used. In some cases, the ecological functioning of the site and the likely effects are well understood and documented elsewhere, for instance in studies commissioned to inform the Habitats Directive Review of Consents. In these cases, the assessment may simply comprise a review of this information. Where there is not sufficient information to undertake the assessment, this is recorded in this report.
- 33. This report aims to set out, in sufficient detail for it to be transparent and understandable, what the effects of the proposed Plan (alone and incombination) are likely to be on each internationally-designated site's qualifying feature, referring to relevant background documents and other information on which these judgements, which are essentially ecological judgements, rely. Guidance states that the size or complexity of the HRA Stage 2 report to inform the Appropriate Assessment will not necessarily reflect the scale of the proposed Option, but rather the complexity of potential effects. The length of the report may not reflect the complexity of ecological judgements made to arrive at the necessary conclusions. Very complex ecological analysis and judgements may be expressed succinctly, with detailed supporting analyses contained in appendices or clearly referenced separate documents.
- 34. One of the challenges of Plan-level Appropriate Assessment is the high-level strategic nature of the Plan elements. The lack of detail in terms of location and likely impacts can make it difficult to prove an absence of 'reasonable scientific doubt'. The presence of an adverse effect will sometimes not be identifiable until later stages of Plan or project development, and this can often result in a desire to defer to later stages of planning and implementation. From recent

guidance we are aware of the approach of "down the line assessment", wherein Plan elements with a likely significant effect may only be allowable when all the following criteria are satisfied:

- Where, due to scientific uncertainty of a novel or complex process and need for more research, information cannot reasonably be gathered at this Plan stage;
- Options are proposed for delivery late on in the Plan ensuring that there
  is time to allow for assessment and delivery of alternatives if necessary;
- Alternatives are included in the Plan where the avoidance of an adverse effect on integrity of European sites is certain, and these are available, feasible and deliverable;
- A commitment is made to pursue alternatives if an adverse effect on integrity of a European site cannot be avoided for the preferred options set.

#### **Incorporated mitigation measures**

35. The HRA Stage 2 assessment of effects takes into account any mitigation measures that may already form part of the proposed Plan specification (i.e. that are 'incorporated'), to determine whether they will most likely reduce the likelihood, magnitude, scale, and/or duration of the effect to a lower level. These measures can include both avoidance and reduction measures, with the former being the preferred option.

#### Conservation objectives and site condition

- 36. The Habitats Regulations require that the Appropriate Assessment is of "the implications for the site in view of that site's conservation objectives." The development of conservation objectives is required by the 1992 'Habitats' Directive (92/43/EEC). In accordance with the Habitats Directive, the objectives aim to achieve the 'favourable conservation status' of the habitat and species features for which SAC is designated.
- 37. Site-specific conservation objectives for SACs and SPAs have been developed by Natural Resources Wales and provide a description of what is considered to be the favourable conservation status of the feature within the whole plan area.
- 38. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:
  - The extent and distribution of qualifying natural habitats and habitats of qualifying species;
  - The structure and function (including typical species) of qualifying natural habitats:
  - The structure and function of the habitats of qualifying species;

- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

#### Additional mitigation measures

39. Where the Plan has been assessed as having an adverse effect on site integrity by undermining the site's conservation objectives, mitigation may be necessary to satisfy the integrity test (see Section 2.4.76 below). Such mitigation is that which is in addition to the incorporated measures described in Section 2 above, and which is usually imposed by a Competent Authority through enforceable conditions or restrictions.

### **Integrity test**

40. Whilst closely related, the appropriate assessment and integrity test are discrete inter-related steps. The appropriate assessment is an objective assessment of the implications for the site if the plan or project goes ahead. The findings of the assessment inform the integrity test, which follows. The concept of site integrity is considered in section C.11 of the DTA HRA Handbook<sup>14</sup> and some key generic principles are summarised in table 4.1.1 below:

#### Table 4.1.1: Key overarching principles from section C.11 of the HRA handbook

In the context of the Regulations, the 'integrity' of a site is defined in England and Wales as 'the coherence of its ecological structure and function across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which the site is (or will be) designated'. In 2018 EC guidance modified this to read 'the coherent sum of the site's ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated.'

The 'integrity' of a site can also be considered to be the quality or condition of being whole or complete; or in a dynamic ecological context, as having resilience and an ability to evolve in ways that are favourable to conservation.

A site can be described as having a high degree of integrity where the inherent potential for meeting site conservation objectives is realised, the capacity for self-repair and self-renewal under dynamic conditions is maintained, and a minimum of external management support is required.

When looking at effects on the integrity of a site it is important to take into account a range of factors, including the possibility of effects manifesting themselves in the short, medium and long-term, the duration of the effects and their reversibility.

The 'integrity of a site' relates to the site's conservation objectives. Taking each qualifying feature in turn, if the conservation objectives for a feature will be undermined, site integrity is necessarily adversely affected. On the contrary, site integrity cannot be considered to be adversely affected if the findings of an appropriate assessment demonstrate that the conservation objectives will not be undermined alone or in combination with other plans or projects. This would include low-impact effects that are too small or short-lived to undermine the achievement of the conservation objectives. For example, this may include operations which may have short term effects but no significant long term adverse effects.

Plans or projects must not be approved unless the authority has made 'certain' that they will not have an adverse effect on site integrity. Such certainty would only exist where the

<sup>&</sup>lt;sup>14</sup> Tyldesley, D. and Chapman, C., (2013) <u>The Habitats Regulations Assessment Handbook</u>, October 2024 Edition UK, DTA Publications Limited.

competent authority is 'convinced' about the lack of effects on integrity which will be the case where no reasonable scientific doubt remains as to the absence of such effects

If suitably conservative assumptions are built into the calculation of scientifically sound 'integrity' thresholds, related to the site conservation objectives and targets, then the fact that the outcome of predictive modelling or calculations in a particular case is close to the threshold, does not mean that the competent authority ought to conclude that there must be reasonable scientific doubt about the absence of adverse effects on integrity. A further layer of precaution is unnecessary.

The test is whether there is 'reasonable' scientific doubt rather than an absolute certainty. It is not possible to demonstrate, nor is it necessary to show, an absolute guarantee that there will not be an adverse effect on site integrity; rather a competent authority, taking advice from the statutory nature conservation body, should identify the potential risks, so far as they may be reasonably foreseeable in light of such information as can reasonably be obtained, and put in place a legally enforceable framework with a view to preventing the risks from materialising.

41. The integrity test requires the competent authority to ascertain whether the Plan (either alone or in-combination with other plans or projects), will not have an adverse effect on site integrity in view of the conservation objectives. The following definition of site integrity is provided by Defra. The integrity of the site is:

"the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the level of populations of the species for which it was classified" <sup>15</sup>

42. This report will conclude with a professional opinion on whether such a test can be met, but it is for the Competent Authority to make that decision in light of the information presented.

#### Key challenges and assumptions

- 43. HRAs of plans and strategies typically have to deal with a degree of uncertainty; very often, it is not possible to provide a detailed assessment of the effects of a proposal as many aspects simply cannot be fully defined at the strategy-level in the planning hierarchy.
- 44. Information provided by third parties, including publicly available information and databases, is considered correct at the time of publication. Due to the dynamic nature of the environment, conditions may change in the period between the preparation of this report, and the construction and operation of the proposed development.
- 45. The HRA has been undertaken in as detailed a way as possible, using all available data sources where they exist. However, the conclusions drawn from this is necessarily limited by the age, type, coverage and availability of data.

<sup>15</sup> Reference

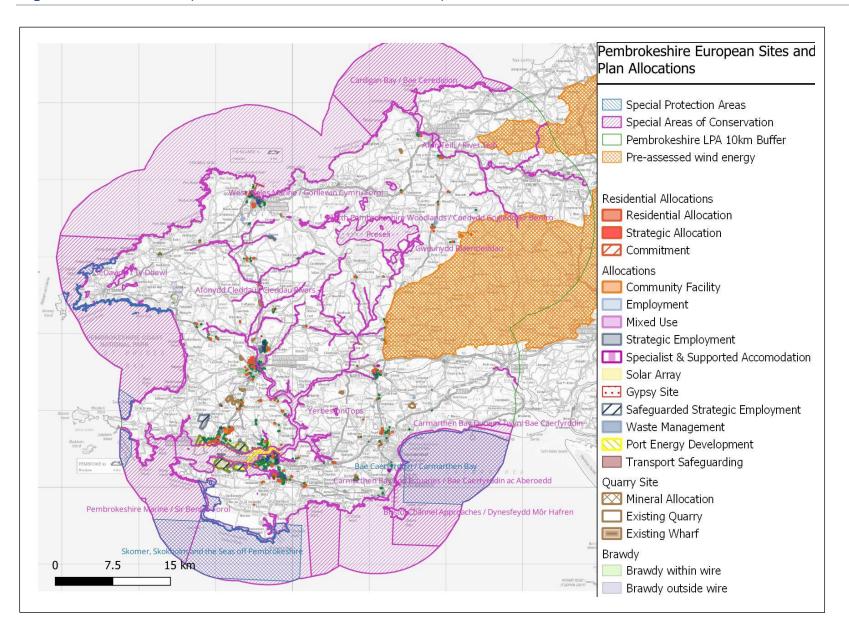
- 46. Any uncertainties and the limitations of the assessment process are acknowledged and highlighted. Recommendations for avoidance and mitigation measures to address the potential adverse effects on European Site integrity identified by this report are also based on the information available at the time of the assessment.
- 47. Other potential future developments not currently included in the LDP2 may arise and will need to be considered at a later date. This applies to development which is nearing or at the application stage. For example, development associated with:
  - Areas of search for sand and gravel.
  - Quarry/mineral site extensions.
  - Major minerals proposals.
  - Major waste proposals, including landfill site extension, waste sites.
  - Others as identified during the process.

# 3. HRA Stage 1 Screening

### Identification of Likely Significant Effects

48. The approach to HRA screening is described above in Section 2 above. The results of this screening of Pembrokeshire Local Development Plan's main proposals and the Habitat Sites within this area, and in proximity, are shown on **Figure 3.1.** 

Figure 3.1 Local Development Plan Area and relevant European sites



#### HRA Stage 1 Screening

- 49. Using the methodology outlined in Section 2 the introductory sections, vision, objectives, policies and allocations were screened to determine if LSE will occur to any European site. The initial screening found that:
- The Plan's introductory chapters, vision and objectives can be screened out as seen in Table 3.1a.
- 12 out of the 21 Strategic Policies have been in screened for LSE as seen in the summary Table 3.1b
- 25 General Policies (excluding those that allocated land for development) have been screened in for LSE as seen in Table 3.1c.
- Allocations: All allocations except for two transport improvement schemes have been screened in as they are likely to LSE to European sites without mitigation – see Table 3.1b in part and Table 3.1c below.
- Appendices to the Plan: See commentary below under Table 3.1d. The appendices can be screen out.
- 50. Those policies and allocations, i.e. those that have been screened in, have been progressed to Stage 2 Appropriate Assessment.
- 51. All European sites excluding Grassholm SPA will be impacted by LSE resulting from policies and allocations. The screening of the European sites can be found in **Table 3.2**. The initial screening of European sites can be found in **Appendix B.**
- 52. Screening of allocations in relation to recreational impacts can be found in **Appendix C and D**.

#### Introductory Chapters, Vision and Objectives

53. The policies that have been screened in – both against the nature of the policy and a possible pathway for impact to an European site, is set out below.

Table 3.1a Screening of LPD2 Introductory Chapters, Vision and Objectives

Element of plan	Assessment and rationale	Category	Screening conclusion
Introductory Section and Chapter 1 Context and Key Issues	Administrative text, Background and Context	Α	Screened out
Vision	General aspirations for the Plan area	А	Screened out
LDP Objectives A-K			
A) Mitigate and respond to the challenge of Climate Change.	General statement	А	Screened out

Floment of plan	Assessment and	Cotogony	Screening
Element of plan	rationale	Category	conclusion
B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.	General statement, however there may be potential effects — implications assessed under subsequent policies	А	Screened out
C) Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises	General statement, however there may be potential effects — implications assessed under subsequent policies	Α	Screened out
D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	General statement, however there may be potential effects — implications assessed under subsequent policies	Α	Screened out
E) Build on the County's strategic location for green/blue energy, maritime and port related development	General statement, however there may be potential effects — implications assessed under subsequent policies	Α	Screened out
F) Protect and promote the Welsh language.	General statement	Α	Screened out
G) Support a range of uses in Town Centres to assist regeneration.	General statement	А	Screened out
H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure.	General statement	Α	Screened out
I) Improve access to goods and services by facilitating improvements in infrastructure <sup>16</sup> and community facilities and directing development to sustainable locations.	General statement, however there may be potential effects — implications assessed under subsequent policies	Α	Screened out
J) Protect and enhance the County's environment, biodiversity and habitats.	General statement	А	Screened out
K) Prevent waste arising and ensure resources are used responsibly.	General statement, however there may be potential effects  — implications assessed under subsequent policies	Α	Screened out

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<sup>&</sup>lt;sup>16</sup> Note that infrastructure includes mobile and broadband provision, transport improvements and sewerage capacity.

# Strategic Policies

Table 3.1b Screening of LPD2 Strategic Policies.

	Policy	Screening Category	Screening Outcome
1.	SP1: Creating Sustainable Places	В	Screened Out: Policy listing general criteria for testing the acceptability / sustainability of proposals. Includes a criterion referring to the maintenance and enhancement of biodiversity.
2.	SP2: Housing requirement	I	Screened In - Although not spatially specific Increased housing will increase population this increase generated nutrient waste leading to LSE in affected catchments. Additionally, increased population will result in an increase in recreational pressure. There is also the potential for increased traffic flows associated with an increased population affecting air quality.
3.	SP3: Affordable housing Target	I	Screened In - Although not spatially specific Increased housing will increase population this increase generated nutrient waste leading to LSE in affected catchments. Additionally, increased population will result in an increase in recreational pressure. There is also the potential for increased traffic flows associated with an increased population affecting air quality.
4.	SP4: Gypsy, Traveller and Show-people Accommodation	I	Screened in The policy is a strategic high-level policy setting out land use priorities with reference to later policies within the plan. The later policies are screened individually, i.e., Policy GN 24 and Policy GN 25. As a precautionary principle however, although not spatially specific increased housing will increase population this increase generated nutrient waste leading to LSE in affected catchments. Additionally, increased population will result in an increase in recreational pressure. There is also the potential for increased traffic flows associated with an increased population affecting air quality.
5.	SP5: Supporting Prosperity	I	Screened in - increased population inside the catchment due to employment opportunities related to the Afonydd Cleddau SAC due to increased phosphate to the catchment. Increased tourism leading to recreation impacts to many SACs, especially those with Marine designations. There is also the potential for increased traffic flows associated with an increased population affecting air quality.
6.	SP6: Settlement Hierarchy  – A sustainable settlement strategy	F	Screened Out: The policy is a strategic high-level policy setting out land use priorities with reference to later policies within the plan. In and of itself (i.e. in the absence of these later policies) the policy cannot lead to any development or change. The later policies are screened individually below.
7.	SP7: Settlement Boundary	F	Screened Out The policy is a strategic high-level policy setting out land use priorities with reference to later policies within the plan. In and of itself (i.e. in the absence of these later policies) the policy cannot lead to any development or change. The later policies are screened individually below.
8.	SP8: Regional Growth Areas	I	Screened In – precautionary as regional growth areas are within 10km of European sites.
9.	SP9: Service Centres and Service Villages	I	Screened in This policy implies that development will be supported by fulfilling a series of criteria. Water Quality (NN). Developments in St Dogmaels are limited by operational permits at Cardigan Wastewater treatment Works. These limitations are scheduled to be resolved in the next AMP cycle.

	Policy	Screening Category	Screening Outcome
10.	SP10: Local Villages	ı	Screened in – This policy implies that development will be supported by fulfilling a series of criteria. No allocations are made but small-scale residential development (1-5 dwellings) will be permitted. Over 5 dwellings will not be supported. Specifically, Phosphate related AA required.
11.	SP11: Countryside	I	Screened in – limited development will be permitted. As a precautionary principle however, although not spatially specific increased population increase generated nutrient waste leading to LSE in affected catchments. Additionally, increased population will result in an increase in recreational pressure.
12.	SP12: Maintaining and Enhancing the Environment	М	Screened In: DTA Handbook includes that - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12
			Screened Out: HRA is required for proposals brought forward under SP13.
13.	SP13: Port and energy- related Development and Celtic Freeport	В/Н	This policy implies that development will be supported by fulfilling a series of criteria. Policy SP 13 policy text specifically refers to development respecting and protecting the natural environment. The reasoned justification, paragraph 4.79, provides further advice on Habitats Regulations Assessment being required. Hence working alongside Policy GN 41 and GN 47, in particular, this policy provides sufficient protection. In view of policy GN 41 and GN 47, policy SP 13 cannot undermine the conservation objectives of any European sites.
	SP14: Strategic	H/I	Screened Out: Project level HRA required for sites impacting Pembrokeshire marine SAC. This policy identifies strategic employment site allocations.
14.	14. Strategic 14. Employment Provision		The policy allows for development of land for employment at locations where impacts on European sites are possible. Reference is made in paragraph 4.90 to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC.
	S/EMP/086/LDP/01 Blackbridge	I	Screened in for: West Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
	S/EMP/136/00001 Former RNAD Site, Trecwn	I	Screened in for: Afonydd Cleddau SAC; N. Pembs Woodlands SAC; Preseli SAC; St David's SAC; W Wales Marine SAC
	S/EMP/034/LDP/02 Goodwick Parrog	I	Screened in for: Afonydd Cleddau SAC; West Wales Marine SAC; N Pembs Woodlands SAC; St David's SAC
	S/EMP/040/00004 Withybush Cluster (Trading Estate)	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	S/EMP/040/00005 Withybush Cluster (North of East Estate)	I	Screened in for: Afonydd Cleddau SAC; Pembs Bat Sites and Bosh Lakes SAC
	S/EMP/040/00001 Withybush Cluster (West Estate)	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC

	Policy	Screening Category	Screening Outcome
	S/EMP/086/LDP2/01 Thornton	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA;
	S/EMP/096/00001 Pembrokeshire Science and Technology Park Cluster	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
15.	SP15: Safeguarding of Existing Employment Sites	ΙΗ	Screened out - This policy identifies existing employment sites which are safeguarded under specific use classes.  These safeguarded sites include parts of sites that have not been developed. However, the policy's reasoned justification (4.96) explicitly refers to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC.
	S/EMP/000/00002 Pembroke Oil Refinery (Valero)	I	Screened in for: Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC; W Wales Marine SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
	S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)	I	Screened in for: Afonydd Cleddau SAC; Limestone Coast SAC; Pembs Marine SAC; W Wales Marine SAC;; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
	S/EMP/000/00004 Waterston Tank Farm and LNG, Milford Haven	I	Screened in for: Afonydd Cleddau SAC ;W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
	S/EMP/000/00007 South Hook LNG (part)	I	Screened in for: W Wales Marine SAC;; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/095/00001 Pembroke Power Station	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; W Wales Marine SAC; Limestone Coast SAC; Pemb Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/034/00003 S/EMP/034G/C1 Goodwick Industrial Estate	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; St David's SAC
	S/EMP/040/00011 S/EMP/040/C1 Withybush cluster (East Estate)	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	S/EMP/040/00012 S/EMP/040/C1 Withybush cluster (North Estate)	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC

	Policy	Screening Category	Screening Outcome
	S/EMP/040/00015 S/EMP/040/C1 Withybush cluster (Lodge Estate)	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	S/EMP/086/00003 S/EMP/086/C1 Thornton Industrial Estate cluster	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	S/EMP/096/00003 S/EMP/096/C1 Pembroke Dock cluster (West Llanion)	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Yerbeston Tops SAC; Castlemartin SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/096/00002 S/EMP/096/C1 Pembroke Dock cluster (Royal Dockyard)	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin SPA; ; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/096/00004 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Ferry Lane)	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Yerbestone Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/096/00005 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Kingswood)	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Yerbestone Tops SAC; ; Castlemartin SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/096/00006 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Waterloo & London Road Industrial Estate)	I	Screened in for: Bristol Channel SAC;; Pembs Marine SAC; Limestone Coast SAC; Yerbestone Tops SAC Pembs Bat Sites and Bosh Lakes SAC; Castlemartin SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/096/00007 S/EMP/096/C3 Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Yerbeston Tops SAC; Yerbestone Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; ; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
16.	SP16: Retail Hierarchy	ı	Screened In – retail can increase tourism to the catchments and lead to increased nutrients to the Afonydd Cleddau SAC and recreational impacts to many European sites due to increased population.
17.	SP17: Visitor Economy	I	Screened In – The policy supports visitor economy development subject to criteria. Recreational impacts to designated sites and increased phosphates to the Afonydd Cleddau SAC need to be considered.
18.	SP18: Non-energy Minerals	С	Screened Out: mainly safeguarding existing mineral works. One allocation and dormant allocations must go through review and planning process before being considered for development. Unlikely to happen in plan period.
19.	SP19: Welsh Language	G	Screened Out: Policy does not impact upon conservation objectives of designated Sites

	Policy	Screening Category	Screening Outcome
20.	SP20: Transport Infrastructure and Accessibility	I	Screened inPrecautionary principle Policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites Safeguarded routes which are referred to in Policy GN 36 are considered separately.
21.	SP 21 Waste Prevention and Management	F	Screened out: This policy is a high-level policy setting out land use priorities which will be used with reference to later policies in the Plan as well as national planning policies. The policy in itself cannot lead to development.

Table 3.1c Screening of LPD2 General Policies

		Category	
	Policy	(criteria A- M)	Screening conclusion
	General Policies		
1.	GN 1 General Development Policy	B/D	Screened out: policy listing general criteria for testing the acceptability of the plan and also includes plan-wide environmental protection.
2.	GN 2 Sustainable Design	В	Screened out: policy listing general criteria for testing the acceptability / sustainability of proposals.
3.	GN 3 Infrastructure and New Development	В	Screened out: this is a policy listing general criteria for testing acceptability defining requirements for proposals.
4.	GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	B / I	Screened out: This is a policy listing the general criteria for testing acceptability of renewable energy proposals. It is not spatially specific but could theoretically be relevant to schemes which might impact upon European sites. However, the policy explicitly refers to 'Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported.' It is therefore considered that Policy GN 41 will provide sufficient protection to avoid schemes coming forward which represent a risk to European sites. In view of policy GN 41, policy GN 4 cannot undermine the conservation objectives of any European sites
5.	GN 5 Renewable Energy – target and allocations The policy consists of 2 parts:  Part 1: sets out the target per annum for renewable energy generation. Part 2: allocates two sites for solar arrays.	A	For Part 1 Screened out: general statement of policy which does not define spatial distribution. Potential effects on European sites cannot be identified as the policy is too general.  For Part 2 This policy identifies solar panel array allocations which are considered in further detail below.
	SPV/066/LDP2/01 East of Hazelbank, Llanstadwell	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC;

Part 5

	Policy	Category (criteria A- M)	Screening conclusion
			Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	SPV/149/LDP2/01 West of Ford Farm, Wolfscastle	I	Screened in for:  Afonydd Cleddau SAC; N Pembs Woodlands SAC; Preseli SAC
6.	GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)	I	Screened in :Future Wales Habitats Regulations Assessment <sup>17</sup> Appendix B, Table B outlines the potential impacts associated with each Pre-Assessed Area. The table also includes a list of avoidance/mitigation measures (from Table 6 of the same Assessment) which must be considered when future proposals come forward for DNS projects. However, Local planning authorities must also ensure that through lower-tier plans no adverse effects occur on the integrity of SACs and SPAs sites with renewable energy proposals that fall below the threshold for DNS applications.
7.	GN 7 Cawdor Barracks including the former Brawdy Airfield	I	Further assessment of this policy is required.  Screened in: Policy lists a variety of land use priorities for the site. There are European sites in proximity to Brawdy and proposals depending on their detail and location may have a likely
8.	GN 8 Employment Proposals	B/I	significant effect on European sites.  Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
	GN 9 Employment Allocations		This policy identifies employment site allocations which are considered in further detail below.
	EMP/030/00001Parc Gwynfryn, Crymych	I	Screened in for:  Afonydd Cleddau SAC; Afon Teifi SAC; N Pembs Woodlands SAC; Gweunydd Blaencleddau SAC; Preseli SAC
	EMP/034/00006Celtic Link Business Park, near Scleddau	I	Screened in for: Afonydd Cleddau SAC;; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
	EMP/040/LDP2/01 Withybush Showground, Haverfordwest	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Pembs Bat Sites and Bos Lakes SAC; W Wales Marine SAC
	EMP/053/00001Old Station Yard, Letterston	ı	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
	EMP/088/LDP/01 Rushacre Enterprise Park extension, Narberth	I	Screened in for: Afonydd Cleddau SAC; Carms Bay SAC; Pembs Marine SAC; Yerbeston Tops SAC;

https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040-habitats-regulations-assessment.pdf

	Policy	Category (criteria A- M)	Screening conclusion
		Í	Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
			Screened in for:
	EMP/000/LDP2/01 Land at Princes Gate Spring Water	i	Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC Carms Bay Dunes SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
	EMP/030/LDP2/01 South of Parc Gwynfryn, Crymych	I	Screened in for:  Afonydd Cleddau SAC; Afon Teifi SAC; Gweunydd Blaencleddau SAC; N Pembs Woodlands SAC; Preseli SAC
			Screened in for:
	EMP/132/LDP2/01 South of K.P. Thomas & Sons, near Templeton	I	Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
			Screened in for:
	EMP/093/00001North of Honeyborough Industrial Estate, Neyland	I	Afonydd Cleddau SAC; Pembs Marine SAC; Bristol Channel SAC; Pembs Bat Sites and Bosh Lakes SAC; Limestone Coast SAC; Yerbeston Tops SAC; Castlemartin Coast SPA
			Part 1
	GN 10 Mixed-use Housing and Employment Proposals This policy is a two-part policy.	В	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
9.	Part 1 sets out the circumstances under which a mixed-use site will be permitted.		For Part 2
	Part 2 identifies two site allocations.		This policy identifies mixed use allocations which are considered in further detail below.
	MXU/040/01 Old Hakin Road, Haverfordwest	I	Screened in for: Afonydd Cleddau SAC; Pembrokeshire Bat Sites and Bosherston Lakes SAC Pembrokeshire Marine SAC; W Wales Marine SAC
	MXU/095/LDP2/01 South Quay, Pembroke	I	Screened in for: Bristol Channel SAC; Pembrokeshire Marine SAC; Limestone Coast SAC; Pembrokeshire Bat Sites and Bosherston Lakes SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
10	GN 11 Protection of Employment Sites and Buildings	B/I	Screened in: Policy includes criteria. However, proposals depending on their detail and location may have a likely significant effect on European sites. Many existing employment sites lie adjacent to designated sites.

	Policy	Category (criteria A- M)	Screening conclusion
11	GN 12 Extensions to Employment Sites	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites. Many existing employment sites lie adjacent to designated sites.
12	GN 13 Residential Development	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
13	GN 14 Replacement Dwellings in the Countryside	В	Screened out: policy listing general criteria and applies Plan wide. Depending on their detail and location proposals may have a likely significant effect on European sites. Proposals will, however, need to be considered under other policies of the Plan as well and given the policy which is not spatially specific opportunities identifying evidence of a real risk with this Policy is low. Other policies of the Plan in particular SP12, GN 41 and GN 47 will ensure that development is carried out appropriately.
14	GN 15 – Housing Mix, Space standards and requirements for Lifetime Home Standards	В	Screened out: policy listing criteria for testing the acceptability of proposals.
	GN 16 - Residential Allocations Sites have been allocated for residential development		This policy identifies residential allocations which are considered further below.
	HSG/040/LDP2/1 Former Community Education Centre, Dew Street Haverfordwest	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	S/HSG/040/LDP2/6 Slade Lane North Haverfordwest	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	HSG/040/LDP2/3 Rear of 76 Pembroke Road Merlins Bridge	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	HSG/086/00222 South West of The Meads Milford Haven	I	Screened in for: ; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	HSG/086/LDP2/1 Land at Myrtle Meadows, Steynton Milford Haven	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA

	Category	
Policy	(criteria A- M)	Screening conclusion
	- IVI)	Screened in for:
HSG/086/LDP2/2 East of Castle Pill Road Steynton Milford Haven	I	Afonydd Cleddau SAC; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
		Screened in for:
HSG/086/LDP2/4 Former Hakin Infants' School Milford Haven	I	W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA;; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
 HSG/086/LDP2/5 Former Hubberston VC School, Hakin Milford Haven	I	; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
		Screened in for:
HSG/086/LDP2/6 Former Hakin Junior School Milford Haven	I	; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
		Screened in for:
HSG/086/LDP2/7 North East of Beaconing, Steynton Milford Haven	I	Afonydd Cleddau SAC; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
		Screened in for:
S/HSG/086/LDP2/3 South of Conway Drive, Castle Pill Road, Steynton Milford Haven	I	Afonydd Cleddau SAC; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
		Screened in for:
HSG/095/00144North of Gibbas Way Pembroke	I	Bristol Channel SAC; Pembs Marine SAC; Yerbeston Tops SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
HSG/095/LDP2/1 Between St Daniels Hill & Norgans Hill Pembroke	I	Bristol Channel SAC; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
HSG/095/LDP2/2 SW of Southlands, St. Daniels Hill Pembroke	I	Bristol Channel SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Limestone Coast SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
HSG/095/LDP2/4 East of Golden Hill Road Pembroke	I	Bristol Channel SAC; Limestone Coast SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC;

Policy	Category (criteria A- M)	Screening conclusion
	,	Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
HSG/095/LDP2/5 South East of Southlands St.Daniels Hill Pembroke	I	Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
HSG/096/00238 North of Pembroke Road Pembroke Dock	I	Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
HSG/096/LDP2/1 Land at Hampshire Drive Pembroke Dock	I	Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
HSG/096/LDP2/2 West of Stranraer Road Pembroke Dock	I	Bristol Channel SAC; Limestone Coast SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
HSG/096/LDP2/3 Land south of Sycamore Woods and west of Lavinia Drive	I	Bristol Channel SAC; Pembs Marine SAC; W Wales Marine SAC Pembs Bat Sites and Bosh Lakes SAC; Limestone Coast SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
		Screened in for:
S/HSG/034F/LDP2/1 Maesgwynne Fishguard	I	Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
		Screened in for:
HSG/093/00066East of Poppy Drive Neyland	I	Afonydd Cleddau SAC; Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
		Screened in for:
 HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park Narberth	I	Afonydd Cleddau SAC; Pembs Marine SAC; Bristol Channel SAC; Carmarthen Bay SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carmarthen Bay SPA
		Screened in for:
 HSG/020/LDP2/1 Land at Tan Ffynnon Fields Cilgerran	I	Cardigan Bay SAC; N Pembs Woodlands SAC; Afon Teifi SAC; Preseli SAC; W Wales Marine SAC
HSG/030/LDP/01 East of Waunaeron Crymych	I	Screened in for:

Policy	Category (criteria A- M)	Screening conclusion
		Afonydd Cleddau SAC; Afon Teifi SAC; Gweunydd Blaencleddau SAC; N Pembs Woodlands SAC; Preseli SAC
HSG/048/00038North of Hayston Vi Johnston	iew I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Castlemartin Coast SPA
HSG/048/LDP2/1 Maes yr Ysgol Johnston	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC
HSG/050/LDP2/1 South of Rock Pa Kilgetty	rk I	Screened in for:  Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Limestone Coast SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
HSG/052/00011South of Cleggars Park Lamphey	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
HSG/052/LDP2/1 Adjacent to Lamphey School Lamphey	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC;; Limestone Coast SAC; Yerbeston Tops SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
HSG/053/LDP2/1 Between Longsto Court and 62, St. Davids Road Letterston	ne I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
HSG/063/00024North of The Kilns Llangwm	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC
HSG/122/00035Awel y Mor extension	on I	Screened in for:  Afon Teifi SAC; W Wales Marine SAC; Cardigan Bay SAC; N Pembs Woodlands SAC
HSG/003/LDP2/1 North of Begelly Farm Begelly	I	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Carmarthen Bay SAC; Limestone Coast SAC; Yerbeston Tops SAC; Carmarthen Bay SPA
HSG/006/00003 Adjacent to Hafod Blaenffos	I	Screened in for:  Afonydd Cleddau SAC; Afon Teifi SAC; Gweunydd Blaencleddau SAC; N Pembs Woodlands SAC; Preseli SAC

Policy	Category (criteria A- M)	Screening conclusion
HSG/022/LDP2/1 Land at Dungleddy Court Clarbeston Road	I	Screened in for:  Afonydd Cleddau SAC; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC; Preseli SAC;
HSG/152/LDP2/1 South of Bro'r Dderwen Clunderwen	I	Screened in for: Afonydd Cleddau SAC; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC
HSG/029/00014Opposite Woodholm Close Crundale	I	Screened in for:  Afonydd Cleddau SAC; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC
HSG/029/LDP2/1 West of Ashford Park Crundale	I	Screened in for: Afonydd Cleddau SAC; ; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC
HSG/043/LDP2/1 Adjacent to Brackenhurst Hill Mountain	I	Screened in for:  Afonydd Cleddau SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC
HSG/046/LDP2/1 Land at West End Cottages Hundleton	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Limestone Coast SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
HSG/047/LDP2/1 South of The Crown Jeffreyston	1	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Yerbeston Tops SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
HSG/049/LDP2/1 East of Brookfield Close and West of Bridge Lane Keeston	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; St David's SAC; Ramsey and St David's Peninsula Coast SPA
HSG/060/LDP2/1 Adjacent to Maesybryn Llandissilio	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Preseli SAC; Gweunydd Blaencleddau SAC
HSG/066/LDP2/1 East of Hazelbank Llanstadwell	I	Screened in for: Bristol Channel SAC; Limestone Coast SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
HSG/081/LDP2/1 West of Globe Inn Maenclochog	I	Screened in for:  Afonydd Cleddau SAC; Gweunydd Blaencleddau SAC; N Pembs Woodlands SAC; Preseli SAC
HSG/099/LDP2/1 Land at Coppins Park Pentlepoir	I	Screened in for: Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA Afonydd Cleddau SAC; Limestone Coast SAC

Part 5

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	Policy	Category (criteria A- M)	Screening conclusion
			Screened in for:
	HSG/113/LDP2/01 South of Robeston Court Robeston Wathen	I	Afonydd Cleddau SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC
			Screened in for:
	HSG/114/LDP/01 East of Pilgrim's Way Roch	I	Afonydd Cleddau SAC; North West Pembrokeshire Commons SAC;W Wales Marine SAC; Pembs Marine SAC; St David's SAC; Ramsey and St David's Peninsula Coast SPA
	HSG/119/LDP2/1 Between		Screened in for:
	Cornerways and Austalise Simpson Cross	I	Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; St David's SAC; Ramsey and St David's Pen Coast SPA
	1100/400/00040 1114/ 514/ 1		Screened in for:
	HSG/120/00018 NW of Wesley Way Spittal	I	Afonydd Cleddau SAC; Pembs Marine SAC; Preseli SAC
			Screened in for:
	HSG/123/LDP/01 North of Parsons Green St Florence	I	Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Limestone Coast SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
			Screened in for:
	HSG/132/LDP2/1 West of Kings Park Farm Templeton	I	Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
			Screened in for:
	HSG/135/LDP2/1 North of Bulford Road Bypass Tiers Cross	I	Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Castlemartin Coast SPA
	USC/140/LDD2/4 Land at Ford Form		Screened in for:
	HSG/149/LDP2/1 Land at Ford Farm Wolfscastle	I	Afonydd Cleddau SAC; North Pembrokeshire Woodland SAC; Preseli SAC
			Screened out: There is no requirement to effectively reassess commitments under the provisions of the
15	GN 17 Residential Commitments	-	Regulations, particularly where they have previously been found to be acceptable by
			the competent authority. This approach is consistent the Habitats Regulations Assessment Handbook <sup>18</sup> , in addition to advice published by NRW specifically concerning

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<sup>&</sup>lt;sup>18</sup> Part C.12. Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook, April 2021 Edition. UK: DTA Publications Limited.

	Policy	Category (criteria A- M)	Screening conclusion
			those situated within SAC P Sensitive Catchments <sup>19</sup> .
	GN 18 Slade Lane, Haverfordwest	I	This policy identifies a residential allocation which is screened under GN 16 Allocations.
	GN 19a Maesgwynne, Fishguard	I	This policy identifies a residential allocation which is screened under GN 16 Allocations
	GN 19bSouth of Conway Drive, Castle Pill Road, Steynton –	I	This policy identifies a residential allocation which is screened under GN 16 Allocations
	GN 20 - Local Needs Affordable Housing	В	Screened out: policy listing general criteria.
16	GN 21 – Exception Sites for Local Needs Affordable Housing	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
17	GN 22 – Specialist and Supported Accommodation	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
	GN 23 - Specialist and Supported Accommodation Allocations		This policy identifies specialist and supported allocations which are considered in further detail below.
	SSA/089/01 South west of Park House, Tenby	I	Screened in for:  Bristol Channel SAC; Carms Bay SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC Yerbeston Tops SAC; Pembs Marine SAC; Carms Bay SPA
	SSA/089/LDP2/01 East of Park House, Tenby	I	Screened in for: Bristol Channel SAC; Carmarthen Bay SAC; Limestone Coast SAC; ; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC; Yerbeston Tops SAC; Carmarthen Bay SPA
	SSA/135/LDP2/01 North of Bulford Road Bypass, Tiers Cross	I	Screened in for: Afonydd Cleddau SAC; Limestone Coast SAC; Pembrokeshire Marine SAC; W Wales Marine SAC; Castlemartin Coast SPA
	SSA/088/LDP2/01 Redstone, Narberth	I	Screened in for:  Afonydd Cleddau SAC; Carms Bay SAC; Pembs Marine SAC;; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC
	GN 24 Gypsy and Traveller Site Allocations		This policy identifies allocations which are considered in further detail below.

 $<sup>^{19} \</sup> Advice \ for \ the \ review \ of \ LDPs \ - \ \underline{https://naturalresourceswales.gov.uk/guidance-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-and-advice/business-sectors/planning-advice/business-se$ development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en 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..."

	Policy	Category (criteria A- M)	Screening conclusion
			Screened in for:
	GT/095/LDP2/01 Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke	I	Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; W Wales Marine SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
			Screened in for:
	GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly	I	Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Limestone Coast SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC;; Carmarthen Bay SPA
	CT/040/LDD2/04 Land cost of		Screened in for:
	GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site	I	Afonydd Cleddau SAC; Pembs MarineSAC; Pembs Bat Sites and Bosh Lakes SAC
			Screened in for:
	GT/095/LDP2/02 Adjacent to Monkton Playing Field	I	Bristol Channel SAC; Limestone Coast SAC; Pembrokeshire Bat Sites and Bosherston Lakes SAC; Pembrokeshire Marine SAC; W Wales Marine SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
18	GN 25 - Gypsy and Traveller Sites and Pitches	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
19	GN 26 – Telecommunications and Digital Technology Infrastructure	В	Screened out: policy listing general criteria and applies Plan wide. Depending on their detail and location proposals may have a likely significant effect on European sites. Proposals will, however, need to be considered under other policies of the Plan as well and given the policy which is not spatially specific opportunities identifying evidence of a real risk with this Policy is low. Other policies of the Plan in particular SP12, GN 41 and GN 47 will ensure that development is carried out appropriately.
20	GN 27 Broadband and Telecommunications on New Developments	В	Screened out: policy listing criteria for testing the acceptability of proposals.
21	GN 28 – Protection and Enhancement of the Historic Environment	В/І	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites (bats in particular). Many historic sites lie within or adjacent to European designated sites.
			Further assessment of this policy is required.
22	GN 29 – Community Facilities	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.

	Policy	Category (criteria A- M)	Screening conclusion
	GN 30 – Community Facility Allocations		This policy identifies allocations which are considered in further detail below.
	CF/040/01 New Primary School, Slade Lane, Haverfordwest		Screened under Policy GN 16 Residential Allocations
	CF/086/LDP2/01 New Primary and Secondary Schools, Milford Haven	I	Screened in for:  Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
23	GN 31 – Retail and Commercial Centre Development	B/I	Screened in: policy has spatial expression by defining Town Centres on the Proposals Map. It lists general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites. Many of the Town Centres lie close to European sites and this creates the potential for an internal conflict with policy GN 41. Further assessment is required.
24	GN 32 – Out-of-Centre Retail and Commercial Development	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
25	GN 33 – Farm Diversification	B / I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites. The policy is not spatially specific but the proximity of many existing farms to European sites creates the potential for an internal conflict with policy GN 41. Further assessment is required.
26	GN 34 – Conversion or Change of Use of Agricultural Buildings	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites (bat species in particular).  Further assessment of this policy is required.
27	GN 35 – Marinas	B / I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites. There are many European sites along the coast which straddle potential locations for siting marinas. Reference is included to impacts on designated conservation sites in paragraph 5.190 The lack of any reference in the main policy wording to potential impacts on designated conservation sites might lead to an internal conflict with Policy SP 12 and Policy GN 41. Further assessment of this policy is required.
28		В	Part 1
	This policy has two elements.		

Policy	Category (criteria A- M)	Screening conclusion
Part 1 provides a criteria-based approach for the evaluation of new transport schemes.		screened out: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
Part 2 identifies the main proposals in the Plan area for improvements to the transport network and, wherever the routes for these are known, to safeguard them from other		However the policy explicitly refers to '1The choice of route and / or site minimises the impact on the built and natural environment, landscapes and property.'
developments that might compromise their implementation.		Policy GN 41 will provide sufficient protection to avoid schemes coming
		forward which represent a risk to European sites. In view of policy
		GN 41, policy GN 36 cannot undermine the conservation objectives of any European sites.
		Part 2: Safeguarded routes are screened below.
		Screened in: The site is <1 km from the Pembrokeshire Marine SAC
TS/LDP2/03 Road & Footpath Well Hill improvement, Pembroke Well Hill - Pembroke	I	Potential issues: Lighting, Surface water runoff, Disruption to bat flight lines, increase in noise, air and light pollution, Increase in diffuse pollution, Disturbance of habitats
		Pembrokeshire Marine SAC, Pembs Bat Sites and Bosh Lakes SAC, Bristol Channel Approaches SAC, Limestone Coast SAC, Castlemartin Coast SPA, Skomer, Skokholm and the Seas off Pembrokeshire SPA
TS/LDP2/04 Public Transport Interchange Milford Haven public		Screened out: This allocation does not detail the proposal. However, due to the location of development it is unlikely to have a significant effect.
transport interchange Milford Haven Train Station	l	Other policies of the Plan in particular SP12, GN 41 and GN 47 will ensure that development is carried out appropriately.
TS/LDP2/05 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Train Station	I	Screened out: Cleddau River SAC is close to the safeguarded area. This allocation does not detail the proposal. However, due to the location of development it is unlikely to have a significant effect.
TS/LDP2/08 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Bus Station	I	Screen in The site is close to the Cleddau River SAC. Potential issues: Lighting, Surface water runoff, increase in noise, air and light pollution, Increase in diffuse pollution.

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	Policy	Category (criteria A- M)	Screening conclusion
			Afonydd Cleddau SAC; Pembrokeshire Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; W Wales Marine
29	GN 37 – Working of Minerals  This policy has two parts.  Part 1 sets out the criteria for considering minerals development.  Part 2 allocates the site at Trefigin for sand and gravel extraction.	В	Screened out: policy listing general criteria and applies Plan wide. Depending on their detail and location proposals may have a likely significant effect on European sites. Proposals will, however, need to be considered under other policies of the Plan as well and given the policy which is not spatially specific opportunities identifying evidence of a real risk with this Policy is low. Other policies of the Plan in particular SP12, GN 41 and GN 47 will ensure that development is carried out appropriately.  Part 2: The site allocation at Trefigin is screened below.
	MN/000/LDP2/001Trefigin Quarry extension	I	Screened in: allocation may have a likely significant effect on European sites. Issues to consider regarding groundwater.  Afon Teifi SAC; North Pembrokeshire Woodlands SAC; Preseli SAC; Cardigan Bay SAC; W Wales Marine SAC; Pembrokeshire Bat Sites and Bosherton Lakes SAC;
30	GN 38 – Safeguarding and Prior Extraction of the Mineral Resource	В	Screened out: policy listing general criteria for testing the acceptability of proposals but also identifies the safeguarded resource on the Proposals Map. Proposals depending on their detail and location may have a likely significant effect on European sites However, paragraph 5.221 also advises 'Where sites are protected for their nature conservation importance, prior extraction will not be sought – indeed, it is highly unlikely that any form of mineral extraction would be permitted in such circumstances.'
31	GN 39 – Secondary Aggregates and Recycled Waste Minerals	В	Screened out: policy listing general criteria for the acceptability of proposals.
32	GN 40 – Buffer Zones around Mineral Sites	А	Screened out as policy does not lead to development.
33	GN 41 Protection of National Statutory Environmental Designations	М	Screened in DTA Handbook - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12
34	GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits	D	Screened out Environmental protection/site safeguarding policy

	Policy	Category (criteria A- M)	Screening conclusion
35	GN 43 Protection of Trees, Woodlands and Hedgerows	D	Screened out Environmental protection/site safeguarding policy
36	GN 44 Protection and Enhancement of Biodiversity	D/E	Screened out Environmental protection/site safeguarding policy
37	GN 45 – Green Infrastructure	A/B	Screened out: general statement of policy/general aspiration and listing general criteria.
38	GN 46 – Coastal Change	В	Screened out: policy lists general criteria applying in defined coastal change management areas which are in proximity to European sites.  However, the policy will work with other policies of the Plan. In and of itself (i.e. in the absence of those other policies) the policy cannot lead to any development or change.  Those other policies are screened individually and will work alongside. Other policies of the
			Plan in particular SP12, GN 41 and GN 47 will ensure that development is carried out appropriately.
39	GN 47 Water Quality and Protection of Water Resources	B/D/E	Screen out: Policies listing general criteria for testing the acceptability/ sustainability of proposals.  Environmental protection/site safeguarding policy. Policies or proposals which steer change in such a way as to protect European sites from adverse effects.
40	GN 48 - Green Wedges	D	Screened out: plan wide safeguarding of settlements.
41	GN 49 – Landscape	D	Screened out: plan wide safeguarding of landscape.
42	GN 50 - Policy deleted.		
43	GN 51 – Protection and Creation of Outdoor Recreation Areas	D	Screened out: Policies listing general criteria for testing the acceptability.
44	GN 52 – Protection of Open Spaces with Amenity Value	D	Screened out: Policies listing general criteria for testing the acceptability.
45	GN 53 Community Growing Spaces	В	Screened out: Policies listing general criteria for testing the acceptability.
46	GN 54 – Visitor Attractions and Leisure Facilities	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on designated sites. The policy is not spatially specific but the potential proximity of new sites

	Policy	Category (criteria A- M)	Screening conclusion
		·	to designated sites and the inherent sensitivity of many sites to visitor pressure including potential impacts on water quality creates the potential for an internal conflict with policy GN 41 and policy GN 47. Further assessment is required.
47	GN 55 – Serviced and Hotel Accommodation	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on designated sites. The policy is not spatially specific but the potential proximity of new sites to designated sites and the inherent sensitivity of many sites to visitor pressure including potential impacts on water quality creates the potential for an internal conflict with policy GN 41 and policy GN 47. Further assessment is required.
48	GN 56 – Caravan, Camping and Chalet Development	B / I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on designated sites. The policy is not spatially specific but the potential proximity of new sites to designated sites and the inherent sensitivity of many sites to visitor pressure including potential impacts on water quality creates the potential for an internal conflict with policy GN 41 and policy GN 47. Further assessment is required.
49	GN 57 – Site Facilities on Existing Caravan and Camping Sites	B / I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.  The policy is not spatially specific but the potential proximity of sites to designated sites and the inherent sensitivity of many sites regarding impacts on water quality creates the potential for an internal conflict with policy GN 41 and policy GN 47. Further assessment is required.
50	GN 58 Self-Catering Accommodation	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on designated sites. The policy is not spatially specific but the potential proximity of new sites to designated sites and the inherent sensitivity of many sites to visitor pressure including potential impacts on water quality creates the potential for an internal conflict with policy GN 41 and policy GN 47. Further assessment is required.

	Policy	Category (criteria A- M)	Screening conclusion
	GN 59 – Waste Management Facilities	B/I	
	The policy is in two parts.		Part 1
51	Part 1 lists criteria for the consideration of waste management facilities.  Part 2 lists employment sites allocated under other policies of the Plan that are potentially suitable for the provision of new in-building facilities for the handling and treatment of waste.		Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.  Part 2  Potential sites have been screened below.
	S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)	I	Screened in for:  Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
			Screened in for:
	S/EMP/000/00004 Waterston – tank farm and LNG	I	Afonydd Cleddau SAC; W Wales Marine SAC; Pembrokeshire Marine SAC; Limestone Coast SAC; Pembrokeshire Bat Sites and Bosherston Lakes SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
			Screened in for:
	EMP/146/00001Waterston Industrial Estate	I	Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	S/EMP/095/00001 Pembroke Power Station Site	I	W Wales Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Bristol Channel SAC; Pembs Marine SAC; Castlemartin Coast SPA Skomer, Skokholm and the Seas off Pembrokeshire SPA;
			Screened in for:
	S/EMP/096/00005 Kingswood Industrial Estate, Pembroke Dock	I	Bristol Channel SAC; W Wales Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC; Yerbeston Tops SAC; Castlemartin SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
			Screened in for:
	S/EMP/096/00006 Waterloo and London Road Industrial Estate, Pembroke Dock	I	Bristol Channel SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Yerbeston Tops SAC; Castlemartin SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
			Screened in for:
	S/EMP/000/00002 Valero Refinery, Rhoscrowther	I	W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA;

	Policy	Category (criteria A- M)	Screening conclusion
			Skomer, Skokholm and the Seas off Pembrokeshire SPA
	EMP/034/00006Celtic Link Business Park, Scleddau	I	Screened in for: Afonydd Cleddau SAC;
	S/EMP/136/00001 Trecwn	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
	EMP/030/00001Parc Gwynfryn, Crymych	I	Screened in for:  Afonydd Cleddau SAC; Afon Teifi SAC;Gweunydd Blaencleddau SAC; N Pembs Woodlands SAC; Preseli SAC
52	GN 60 – Disposal of Waste on Land	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.

## Appendices of the Local Development Plan

The Appendices set out statistics on housing provision, the anticipated programme for Supplementary Planning Guidance preparation, the approach to monitoring and information on programme for delivery of the safeguarded routes under Policy GN 36 of the Plan. The Appendices are screened out under category G; it cannot have any conceivable effect on any European site.

### **European Sites**

Table 3.2 Screening of European Sites

Impact Pathway	Affected Designated Site	Screened in for AA
	Afonydd Cleddau SAC Pembrokeshire Marine SAC	Yes – Major roads were located within 200m of the sites.
Atmospheric Pollution	North Pembrokeshire Woodlands SAC Preseli SAC	Screened in precautionary
	Carmarthen Bay Dunes SAC Northwest Pembrokeshire Commons SAC	No – lack of likely commuting routes associated with allocations.
Afonydd Cleddau SAC (Nutrient Neutrality) Pembrokeshire Marine SAC Carmarthen Bay SAC Carmarthen Bay SPA. Cardigan Bay SAC Afon Teifi SAC Gweunydd Blaencleddau SAC North Pembrokeshire Woodlands SAC		Yes – Construction related water quality to all sites and phosphates related LSE to the Afon Teifi and Afonydd Cleddau.
Recreation	All sites <b>excluding</b> : Grassholm SPA, Carmarthen Bay Dunes SAC	Yes, all sites excluding those listed as screened out due to distance.
Direct Habitat Loss	None	No – there are no allocations within the boundaries of any European Site
Loss of functionally Linked Land	Afonydd Cleddau SAC Pembrokeshire Marine SAC Limestone Coast SAC Gweunydd Blaencleddau SAC Preseli SAC North Pembrokeshire Woodlands SAC	Yes – screened in as under the precautionary principle and potential to infringe on functionally linked habitat and conservation objectives.

Impact Pathway	Affected Designated Site	Screened in for AA
	Pembrokeshire Bat Sites and Bosherston Lakes SAC	
	Yerbeston Tops SAC	
Disturbance	Pembrokeshire Marine SAC West Wales Marine SAC	Yes – marine sites where allocations are taking place near or inside the marine SACs. Specific disturbance via vibration and noise.

## **Screening Conclusions**

1. The screening has concluded that significant effects are either likely or uncertain for the following sites and options; these are therefore taken forward to an appropriate assessment stage.

Bristol Channel Approaches SAC	Preseli SAC	
St David's SAC	Gweunydd Blaencleddau SAC	
Ramsey and St David's Peninsula Coast SPA	Afon Teifi SAC	
Carmarthen Bay SPA	Cardigan Bay SAC	
West Wales Marine SAC	Carmarthen Bay SAC	
Yerbeston Tops SAC	Limestone Coast SAC	
Castlemartin Coast SPA	Carmarthen Bay Dunes SAC	
Pembrokeshire Bat Sites and Bosherston Lakes SAC	Pembrokeshire Marine SAC	
North Pembrokeshire Woodlands SAC	Afonydd Cleddau SAC	
Skomer Skokholm and Seas off Pembrokeshire SPA	Northwest Pembrokeshire Commons SAC	

- 2. The following site have been screened out due to there being no likely significant effects:
  - Grassholm SPA

Table 3.1 Summary of policies requiring Stage 2 Appropriate Assessment

Strategic Policy	Screening Outcome
SP2: Housing requirement	Screened In
SP3: Affordable housing Target	Screened In
SP4: Gypsy, Traveller and Show-people	Screened in
SP5: Supporting Prosperity	Screened in
SP8: Regional Growth Areas	Screened In
SP9: Narberth Rural Town, Service Centres and Service Villages	Screened in
SP10: Local Villages	Screened in
SP11: Countryside	Screened in

Strategic Policy	Screening Outcome
SP12: Maintaining and Enhancing the Natural Environment	Screened in
SP14: Strategic Employment Provision	Part 1: Screened Out
The policy has two Parts Part 1 includes policy provisions for the sites allocated. Part 2 sets out a list of allocations.	Part 2: Screened In
S/EMP/086/LDP/01 Blackbridge	Screened in
S/EMP/136/00001 Former RNAD Site, Trecwn	Screened in
S/EMP/034/LDP/02 Goodwick Parrog	Screened in
S/EMP/040/00004 Withybush Cluster (Trading Estate)	Screened in
S/EMP/040/00005 Withybush Cluster (North of Lodge Estate)	Screened in
S/EMP/040/00001 Withybush Cluster (West Estate)	Screened in
S/EMP/086/LDP2/01 Thornton	Screened in
S/EMP/096/00001 Pembrokeshire Science and Technology Park Cluster	Screened in
SP15: Safeguarding of Existing Employment Sites	Part 1
The policy has two Parts	Screened Out
Part 1 includes policy provisions for the sites allocated	Date Organization
Part 2 sets out a list of allocations.	Part 2 Screened in
S/EMP/000/00002 Pembroke Oil Refinery (Valero)	Screened In
S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)	Screened In
S/EMP/000/00004 Waterston Tank Farm and LNG, Milford Haven	Screened In
S/EMP/000/00007 South Hook LNG (part)	Screened In
S/EMP/095/00001 Pembroke Power Station	Screened In
S/EMP/034/00003 S/EMP/034G/C1 Goodwick Industrial Estate	Screened In
S/EMP/040/00011 S/EMP/040/C1 Withybush cluster (East Estate)	Screened In
S/EMP/040/00012 S/EMP/040/C1 Withybush cluster (North Estate)	Screened In
S/EMP/040/00015 S/EMP/040/C1 Withybush cluster (Lodge Estate)	Screened In
S/EMP/086/00003 S/EMP/086/C1 Thornton Industrial Estate cluster	Screened In
S/EMP/096/00003 S/EMP/096/C1 Pembroke Dock cluster (West Llanion)	Screened In
S/EMP/096/00002 S/EMP/096/C1 Pembroke Dock cluster (Royal Dockyard)	Screened In
S/EMP/096/00004 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Ferry Lane)	Screened In
S/EMP/096/00005 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Kingswood)	Screened In
S/EMP/096/00006 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Waterloo & London Road Industrial Estate)	Screened In
S/EMP/096/00007 S/EMP/096/C3 Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)	Screened In
SP16: Retail Hierarchy	Screened In
SP17: Visitor Economy	Screened In
SP20: Transport Infrastructure and Accessibility	Screened In

General Policy	Screening outcome	
GN 5 Renewable Energy – target and allocations	For Part 1 Screened out	
The policy consists of 2 parts:		
<ul> <li>Part 1: sets out the target per annum for renewable energy generation.</li> </ul>	For Part 2	
<ul> <li>Part 2: allocates two sites for solar arrays.</li> </ul>	The sites are screened below.	
SPV/066/LDP2/01 East of Hazelbank, Llanstadwell	Screened in	
SPV/149/LDP2/01 West of Ford Farm, Wolfscastle	Screened in	
GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)	Screened in:	
GN 7 Cawdor Barracks including the former Brawdy Airfield	Screened in:	
GN 8 Employment Proposals	Screened in:	
GN 9 Employment Allocations	This policy identifies employment site allocations	
EMP/030/00001 Parc Gwynfryn, Crymych	Screened in	
EMP/034/00006Celtic Link Business Park, near Scleddau	Screened in	
EMP/040/LDP2/01 Withybush Showground, Haverfordwest	Screened in	
EMP/053/00001Old Station Yard, Letterston	Screened in	
EMP/088/LDP/01 Rushacre Enterprise Park extension, Narberth	Screened in	
EMP/000/LDP2/01 Land at Princes Gate Spring Water	Screened in	
EMP/030/LDP2/01 South of Parc Gwynfryn, Crymych	Screened in	
EMP/132/LDP2/01 South of K.P. Thomas & Sons, near Templeton	Screened in	
EMP/093/00001North of Honeyborough Industrial Estate, Neyland	Screened in	
GN 10 Mixed-use Housing and Employment Proposals	Part 1	
This policy is a two-part policy.	Screened in	
Part 1 sets out the circumstances under which a mixed-use site will be permitted.  Part 2 identifies two site allocations.	For Part 2 This policy identifies mixed use allocations which are summarised below.	
MXU/040/01 Old Hakin Road, Haverfordwest	Screened in	
MXU/095/LDP2/01 South Quay, Pembroke	Screened in	
GN 11 Protection of Employment Sites and Buildings	Screened in:	
GN 12 Extensions to Employment Sites	Screened in:	
GN 13 Residential Development	Screened in:	
GN 16 – Residential Allocations Sites have been allocated for residential development	This policy identifies residential allocations which are considered in further below.	
HSG/040/LDP2/1Former Community Education Centre, Dew Street Haverfordwest	Screened in	
S/HSG/040/LDP2/6 Slade Lane North Haverfordwest	Screened in	
HSG/040/LDP2/3 Rear of 76 Pembroke Road Merlins Bridge	Screened in	
HSG/086/00222 South West of The Meads Milford Haven	Screened in	
HSG/086/LDP2/1 Land at Myrtle Meadows, Steynton Milford Haven	Screened in	
HSG/086/LDP2/2 East of Castle Pill Road Steynton Milford Haven	Screened in	
HSG/086/LDP2/4 Former Hakin Infants' School Milford Haven	Screened in	

General Policy	Screening outcome	
HSG/086/LDP2/5 Former Hubberston VC School, Hakin Milford		
Haven	Screened in	
HSG/086/LDP2/6 Former Hakin Junior School Milford Haven	Screened in:	
HSG/086/LDP2/7 North East of Beaconing, Steynton Milford Haven	Screened in	
S/HSG/086/LDP2/3 South of Conway Drive, Castle Pill Road, Steynton Milford Haven	Screened in	
HSG/095/00144North of Gibbas Way Pembroke	Screened in	
HSG/095/LDP2/1 Between St Daniels Hill & Norgans Hill Pembroke	Screened in	
HSG/095/LDP2/2 SW of Southlands, St. Daniels Hill Pembroke	Screened in	
HSG/095/LDP2/4 East of Golden Hill Road Pembroke	Screened in	
HSG/095/LDP2/5 South East of Southlands St.Daniels Hill Pembroke	Screened in	
HSG/096/00238 North of Pembroke Road Pembroke Dock	Screened in	
HSG/096/LDP2/1 Land at Hampshire Drive Pembroke Dock	Screened in	
HSG/096/LDP2/2 West of Stranraer Road Pembroke Dock	Screened in	
HSG/096/LDP2/3 Land south of Sycamore Woods and west of Lavinia Drive Pembroke Dock	Screened in	
S/HSG/034F/LDP2/1 Maesgwynne Fishguard	Screened in	
HSG/093/00066East of Poppy Drive Neyland	Screened in	
HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park Narberth	Screened in	
HSG/020/LDP2/1 Land at Tan Ffynnon Fields Cilgerran	Screened in	
HSG/030/LDP/01 East of Waunaeron Crymych	Screened in	
HSG/048/00038North of Hayston View Johnston	Screened in	
HSG/048/LDP2/1 Maes yr Ysgol Johnston	Screened in	
HSG/050/LDP2/1 South of Rock Park Kilgetty	Screened in	
HSG/052/00011South of Cleggars Park Lamphey	Screened in	
HSG/052/LDP2/1 Adjacent to Lamphey School Lamphey	Screened in	
HSG/053/LDP2/1 Between Longstone Court and 62, St. Davids Road Letterston	Screened in	
HSG/063/00024North of The Kilns Llangwm	Screened in	
HSG/122/00035Awel y Mor extension St Dogmaels	Screened in	
HSG/003/LDP2/01 North of Begelly Farm Begelly	Screened in	
HSG/006/00003Adjacent to Hafod Blaenffos	Screened in	
HSG/022/LDP2/1 Land at Dungleddy Court Clarbeston Road	Screened in	
HSG/152/LDP2/1 South of Bro'r Dderwen Clunderwen	Screened in	
HSG/029/00014Opposite Woodholm Close Crundale	Screened in	
HSG/029/LDP2/1 West of Ashford Park Crundale	Screened in	
HSG/043/LDP2/1 Adjacent to Brackenhurst Hill Mountain	Screened in	
HSG/046/LDP2/1 Land at West End Cottages Hundleton	Screened in	
HSG/047/LDP2/1 South of The Crown Jeffreyston	Screened in	
HSG/049/LDP2/1 East of Brookfield Close and West of Bridge Lane Keeston	Screened in	
HSG/060/LDP2/1 Adjacent to Maesybryn Llandissilio	Screened in	
HSG/066/LDP2/1 East of Hazelbank Llanstadwell	Screened in	
HSG/081/LDP2/1 West of Globe Inn Maenclochog	Screened in	
HSG/099/LDP2/1 Land at Coppins Park Pentlepoir	Screened in	

General Policy	Screening outcome		
HSG/113/LDP2/01 South of Robeston Court Robeston Wathen	Screened in		
HSG/114/LDP/01 East of Pilgrim's Way Roch	Screened in		
HSG/119/LDP2/1 Between Cornerways and Austalise Simpson Cross	Screened in		
HSG/120/00018NW of Wesley Way Spittal	Screened in		
HSG/123/LDP/01 North of Parsons Green St Florence	Screened in		
HSG/132/LDP2/1 West of Kings Park Farm Templeton	Screened in		
HSG/135/LDP2/1 North of Bulford Road Bypass Tiers Cross	Screened in		
HSG/149/LDP2/1 Land at Ford Farm Wolfscastle	Screened in		
GN 18 Slade Lane, Haverfordwest	This policy identifies a residential allocation which was screened in under Policy GN 16.		
GN 19a Maesgwynne, Fishguard	This policy identifies a residential allocation which was screened in under Policy GN 16.		
GN 19bSouth of Conway Drive, Castle Pill Road, Steynton –	This policy identifies a residential allocation which was screened in under Policy GN 16.		
GN 21 – Exception Sites for Local Needs Affordable Housing	Screened in:		
GN 22 – Specialist and Supported Accommodation	Screened in:		
GN 23 – Specialist and Supported Accommodation Allocations	This policy identifies specialist and supported allocations		
SSA/089/01 South west of Park House, Tenby	Screened in		
SSA/089/LDP2/01 East of Park House, Tenby	Screened in		
SSA/135/LDP2/01North of Bulford Road Bypass, Tiers Cross	Screened in		
SSA/088/LDP2/01 Redstone, Narberth	Screened in		
GN 24 Gypsy and Traveller Site Allocations	This policy identifies allocations		
GT/095/LDP2/01 Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke	Screened in		
GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly	Screened in		
GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site	Screened in		
GT/095/LDP2/02 South of Monkton Playing Field	Screened in		
GN 25 – Gypsy and Traveller Sites and Pitches	Screened in:		
GN 28 – Protection and Enhancement of the Historic Environment	Screened in:		
GN 29 – Community Facilities	Screened in:		
This policy iden allocations			
	Screened under Policy GN 16  – Slade Lane allocation.		
CF/040/01 New Primary School, Slade Lane, Haverfordwest			
CF/040/01 New Primary School, Slade Lane, Haverfordwest CF/086/LDP2/01 New Primary and Secondary Schools, Milford Haven			

General Policy	Screening outcome		
GN 32 – Out-of-Centre Retail and Commercial Development	Screening outcome Screened in:		
GN 33 – Farm Diversification	Screened in:		
GN 34 – Conversion or Change of Use of Agricultural Buildings			
GN 35 – Marinas	Screened in:		
GN 36 – Transport Routes and Improvements	osi osi isa iii.		
This policy has two elements.	Part 1		
Part 1 provides a criteria-based approach for the evaluation of new transport schemes.	screened out:		
Part 2 identifies the main proposals in the Plan area for improvements to the transport network and, wherever the routes for these are known, to safeguard them from other developments that might compromise their implementation.	Part 2: Safeguarded routes are screened below.		
TS/LDP2/03 Road & Footpath Well Hill improvement, Pembroke Well Hill - Pembroke	Screened in:		
TS/LDP2/04 Public Transport Interchange Milford Haven public transport interchange Milford Haven Train Station	Screened out:		
TS/LDP2/05 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Train Station	Screened out:		
TS/LDP2/08 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Bus Station	Screen in		
GN 37 – Working of Minerals	Part 1: Screened out:		
This policy has two parts.	Part 2: The site allocation at		
Part 1 sets out the criteria for considering minerals development.  Part 2 allocates the site at Trefigin for sand and gravel extraction.	Trefigin is screened below.		
MN/000/LDP2/001 Trefigin Quarry extension	Screened in:		
GN 41 Protection of National Statutory Environmental Designations	Screened in		
GN 54 - Visitor Attractions and Leisure Facilities	Screened in:		
GN 55 – Serviced and Hotel Accommodation	Screened in:		
GN 56 - Caravan, Camping and Chalet Development	Screened in:		
GN 57 – Site Facilities on Existing Caravan and Camping Sites	Screened in:		
GN 58 Self-Catering Accommodation	Screened in:		
GN 59 – Waste Management Facilities			
The policy is in two parts.	Part 1		
	Screened in:		
Part 1 lists criteria for the consideration of waste management	Part 2		
facilities.	Potential sites have been		
	screened below.		
Part 2 lists employment sites allocated under other policies of the Plan that are potentially suitable for the provision of new in-building facilities for the handling and treatment of waste.			
S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)	Screened in		
S/EMP/000/00004 Waterston – tank farm and LNG	Screened in		
EMP/146/00001Waterston Industrial Estate	Screened in		
S/EMP/095/00001 Pembroke Power Station Site	Screened in		
S/EMP/096/00005 Kingswood Industrial Estate, Pembroke Dock	Screened in		

General Policy	Screening outcome	
S/EMP/096/00006 Waterloo and London Road Industrial Estate, Pembroke Dock	Screened in	
S/EMP/000/00002 Valero Refinery, Rhoscrowther	Screened in	
EMP/034/00006Celtic Link Business Park, Scleddau	Screened in	
S/EMP/136/00001 Trecwn	Screened in	
EMP/030/00001Parc Gwynfryn, Crymych	Screened in	
GN 60 - Disposal of Waste on Land	Screened in	

# 4. HRA Stage 2 Appropriate Assessment

3. The assessment reported in Section 3 HRA Stage 1 Screening has concluded that there will be Likely Significant Effects that will undermine the European Sites' conservation objectives. A summary of sites screened in during Stage 1 can be found in **Table 4.1**.

Table 4.1 Summary of Stage 1 Screening.

Impact Pathway	Affected Designated Site	Screened in for AA	
	Afonydd Cleddau SAC		
Atmospheric	Pembrokeshire Marine SAC	Yes	
Pollution	North Pembrokeshire Woodlands SAC		
	Preseli SAC		
	Afonydd Cleddau SAC (Nutrient Neutrality)		
	Pembrokeshire Marine SAC		
	Carmarthen Bay SAC		
Matan Ovality	Carmarthen Bay SPA.	Yes	
Water Quality	Cardigan Bay SAC	165	
	Afon Teifi SAC		
	Gweunydd Blaencleddau SAC		
	North Pembrokeshire Woodlands SAC		
	All sites excluding:	.,	
Recreation	Grassholm SPA,	Yes, all sites excluding those listed as exempt	
	Carmarthen Bay Dunes SAC	due to distance.	
	Afonydd Cleddau SAC		
	Pembrokeshire Marine SAC		
	Limestone Coast SAC		
Loss of	Gweunydd Blaencleddau SAC		
Functionally Linked Land	Preseli SAC	Yes	
Linked Land	North Pembrokeshire Woodlands SAC		
	Pembrokeshire Bat Sites and Bosherston Lakes SAC		
	Yerbeston Tops SAC		
B' I	Pembrokeshire Marine SAC	V	
Disturbance	West Wales Marine SAC	Yes	

In conclusion the assessment, without any mitigation measures, – e,g, applying a precautionary approach on the basis of the current understanding – cannot conclude no adverse effect on the integrity of the sites.

# 5. (Appropriate Assessment)

#### **General Measures**

- 4. The Screening in Section 3 HRA Stage 1 Screening showed that there will be a credible risk of LSE to designated sites via
  - a. non-phosphorous related water quality,
  - b. loss of functionally linked land and
  - c. disturbance to terrestrial species.
  - d. Recreation
  - e. N/P Nutrient neutrality
  - f. Air quality impacts

#### Non phosphorous Water quality

- 5. Water quality effects resulting from construction and operation of allocations may lead to increases of contaminants and sediment to European sites, thus compromising the integrity of their Conservation Objectives and resulting in an adverse effect on the integrity of the site.
- 6. The current mitigation within the LDP2, SP12 Maintaining and enhancing the Environment and GN41 Protection of National Statutory Environmental Designations, is not sufficient to mitigate the adverse effect of non-nutrient related water quality to European sites. As such, adverse effects are likely to occur unless the current mitigation is strengthened to specifically address impacts at the project level.

## Functionally linked land

7. In respect to habitat loss and species harm, construction may reduce the quality of habitats through indirect loss of functionally linked land, including foraging habitat. At the plan level, the locations of functionally linked land is not commonly assessed as it not reasonable during the high-level assessment of plans. It should be noted that foraging and commuting habitat may be reduced for species such as birds, otter, and bats due to the proximity of allocations to European sites within the Plan Area (See Figure 1.1).

#### Disturbance during construction

- 8. In addition to this, species may be harmed or killed during construction phases of allocations. The current mitigation within the LDP2, SP12 Maintaining and enhancing the Environment and GN41 Protection of National Statutory Environmental Designations, is not sufficient to mitigate the loss of functionally linked land. As such, adverse effects are likely to occur unless the current mitigation is strengthened to specifically address LSE at the project level.
  - 9. Disturbance may occur during construction due to increased personnel and noise during construction phases of the allocations. The current mitigation within the LDP2, SP12 Maintaining and enhancing the Environment and GN41 Protection of National Statutory Environmental Designations, is not sufficient to mitigate

- disturbance. As such, adverse effects are likely to occur unless the current mitigation is strengthened to specifically address LSE at the project level.
- 10. On the basis of the information available within the plan, additional plan specific mitigation or policy caveats may be required to fully mitigate potential adverse effects resulting from the following Policies and allocations: As they relate to the above impacts on site Conservation Objectives.

#### **Strategic Policy**

**SP2: Housing requirement** 

**SP3: Affordable housing Target** 

SP4: Gypsy, Traveller and Show-people

**SP5: Supporting Prosperity** 

**SP8: Regional Growth Areas** 

SP9: Narberth Rural Town, Service Centres and Service Villages

SP10: Local Villages

**SP11: Countryside** 

SP12: Maintaining and Enhancing the Natural Environment

#### **SP14: Strategic Employment Provision**

The policy has two Parts Part 1 includes policy provisions for the sites allocated. Part 2 sets out a list of allocations. Part 1: Screened Out Part 2: Screened In

S/EMP/086/LDP/01 Blackbridge

S/EMP/136/00001 Former RNAD Site, Trecwn

S/EMP/034/LDP/02Goodwick - Parrog

S/EMP/040/00004 Withybush Cluster (Trading Estate)

S/EMP/040/00005 Withybush Cluster (North of Lodge Estate)

S/EMP/040/00001 Withybush Cluster (West Estate)

S/EMP/086/LDP2/01 Thornton

S/EMP/096/00001 Pembrokeshire Science and Technology Park Cluster

#### SP15: Safeguarding of Existing Employment Sites

The policy has two Parts

Part 1 includes policy provisions for the sites allocated

Part 2 sets out a list of allocations. Part 1 Screened Out Part 2: Screened in

S/EMP/000/00002 Pembroke Oil Refinery (Valero)

S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)

S/EMP/000/00004 Waterston Tank Farm and LNG, Milford Haven

S/EMP/000/00007 South Hook LNG (part)

S/EMP/095/00001 Pembroke Power Station

S/EMP/034/00003 S/EMP/034G/C1 Goodwick Industrial Estate

S/EMP/040/00011 S/EMP/040/C1 Withybush cluster (East Estate)

S/EMP/040/00012 S/EMP/040/C1 Withybush cluster (North Estate)

Strategic Policy			
S/EMP/040/00015 S/EMP/040/C1 Withybush cluster (Lodge Estate)			
S/EMP/086/00003 S/EMP/086/C1 Thornton Industrial Estate cluster			
S/EMP/096/00003 S/EMP/096/C1 Pembroke Dock cluster (West Llanion)			
S/EMP/096/00002 S/EMP/096/C1 Pembroke Dock cluster (Royal Dockyard)			
S/EMP/096/00004 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Ferry Lane)			
S/EMP/096/00005 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Kingswood)			
S/EMP/096/00006 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Waterloo & London Road Industrial Estate)			
S/EMP/096/00007 S/EMP/096/C3 Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)			
SP16: Retail Hierarchy			
SP17: Visitor Economy			
SP20: Transport Infrastructure and Accessibility			
SP21: Waste Prevention and Management			

#### **General Policy**

#### GN 5 Renewable Energy - target and allocations

The policy consists of 2 parts:

- Part 1: sets out the target per annum for renewable energy generation.
- Part 2: allocates two sites for solar arrays.

SPV/066/LDP2/01 East of Hazelbank, Llanstadwell

SPV/149/LDP2/01 West of Ford Farm, Wolfscastle

# GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)

#### GN 7 Cawdor Barracks including the former Brawdy Airfield

#### **GN 8 Employment Proposals**

#### **GN 9 Employment Allocations**

EMP/030/00001Parc Gwynfryn, Crymych

EMP/034/00006Celtic Link Business Park, near Scleddau

EMP/040/LDP2/01 Withybush Cluster, Haverfordwest

EMP/053/00001Old Station Yard, Letterston

EMP/088/LDP/01 Rushacre Enterprise Park extension, Narberth

EMP/000/LDP2/01 Land at Princes Gate Spring Water

EMP/030/LDP2/01 South of Parc Gwynfryn, Crymych

EMP/132/LDP2/01 South of K.P. Thomas & Sons, near Templeton

EMP/093/00001North of Honeyborough Industrial Estate, Neyland

#### **GN 10 Mixed-use Housing and Employment Proposals**

This policy is a two-part policy.

Part 1 sets out the circumstances under which a mixed-use site will be permitted. Screened in.

Part 2 identifies two site allocations.

MXU/040/01 Old Hakin Road, Haverfordwest

MXU/095/LDP2/01 South Quay, Pembroke

General Policy
GN 11 Protection of Employment Sites and Buildings
GN 12 Extensions to Employment Sites
GN 13 Residential Development
GN 16 – Residential Allocations Sites have been allocated for residential development
HSG/040/LDP2/1Former Community Education Centre, Dew Street Haverfordwest
S/HSG/040/LDP2/6 Slade Lane North Haverfordwest
HSG/040/LDP2/3 Rear of 76 Pembroke Road Merlins Bridge
HSG/086/00222 South West of The Meads Milford Haven
HSG/086/LDP2/1 Land at Myrtle Meadows, Steynton Milford Haven
HSG/086/LDP2/2 East of Castle Pill Road Steynton Milford Haven
HSG/086/LDP2/4 Former Hakin Infants' School Milford Haven
HSG/086/LDP2/5 Former Hubberston VC School, Hakin Milford Haven
HSG/086/LDP2/6 Former Hakin Junior School Milford Haven
HSG/086/LDP2/7 North East of Beaconing, Steynton Milford Haven
S/HSG/086/LDP2/3 South of Conway Drive, Castle Pill Road, Steynton Milford Haven
HSG/095/00144North of Gibbas Way Pembroke
HSG/095/LDP2/1 Between St Daniels Hill & Norgans Hill Pembroke
HSG/095/LDP2/2 SW of Southlands, St. Daniels Hill Pembroke
HSG/095/LDP2/4 East of Golden Hill Road Pembroke
HSG/095/LDP2/5 South East of Southlands St.Daniels Hill Pembroke
HSG/096/00238 North of Pembroke Road Pembroke Dock
HSG/096/LDP2/1 Land at Hampshire Drive Pembroke Dock
HSG/096/LDP2/2 West of Stranraer Road Pembroke Dock
HSG/096/LDP2/3 Land south of Sycamore Woods and west of Lavinia Drive Pembroke Dock
S/HSG/034F/LDP2/1 Maesgwynne Fishguard
HSG/093/00066East of Poppy Drive Neyland
HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park Narberth
HSG/020/LDP2/1 Land at Tan Ffynnon Fields Cilgerran
HSG/030/LDP/01 East of Waunaeron Crymych
HSG/048/00038North of Hayston View Johnston
HSG/048/LDP2/1 Maes yr Ysgol Johnston
HSG/050/LDP2/1 South of Rock Park Kilgetty
HSG/052/00011South of Cleggars Park Lamphey
HSG/052/LDP2/1 Adjacent to Lamphey School Lamphey
HSG/053/LDP2/1 Between Longstone Court and 62, St. Davids Road Letterston
HSG/063/00024North of The Kilns Llangwm
HSG/122/00035Awel y Mor extension St Dogmaels
HSG/003/LDP2/01 North of Begelly Farm Begelly
HSG/006/00003Adjacent to Hafod Blaenffos
HSG/022/LDP2/1 Land at Dungleddy Court Clarbeston Road
HSG/152/LDP2/1 South of Bro'r Dderwen Clunderwen
HSG/029/00014Opposite Woodholm Close Crundale
HSG/029/LDP2/1 West of Ashford Park Crundale

## **General Policy** HSG/043/LDP2/1 Adjacent to Brackenhurst Hill Mountain HSG/046/LDP2/1 Land at West End Cottages Hundleton HSG/047/LDP2/1 South of The Crown Jeffreyston HSG/049/LDP2/1 East of Brookfield Close and West of Bridge Lane Keeston HSG/060/LDP2/1 Adjacent to Maesybryn Llandissilio HSG/066/LDP2/1 East of Hazelbank Llanstadwell HSG/081/LDP2/1 West of Globe Inn Maenclochog HSG/099/LDP2/1 Land at Coppins Park Pentlepoir HSG/113/LDP2/01 South of Robeston Court Robeston Wathen HSG/114/LDP/01 East of Pilgrim's Way Roch HSG/119/LDP2/1 Between Cornerways and Austalise Simpson Cross HSG/120/00018NW of Wesley Way Spittal HSG/123/LDP/01 North of Parsons Green St Florence HSG/132/LDP2/1 West of Kings Park Farm Templeton HSG/135/LDP2/1 North of Bulford Road Bypass Tiers Cross HSG/149/LDP2/1 Land at Ford Farm Wolfscastle GN 18 Slade Lane. Haverfordwest This policy identifies a residential allocation which was screened in under Policy GN 16. GN 19a Maesgwynne, Fishguard This policy identifies a residential allocation which was screened in under Policy GN 16. GN 19b South of Conway Drive, Castle Pill Road, Stevnton - This policy identifies a residential allocation which was screened in under Policy GN 16. GN 21 - Exception Sites for Local Needs Affordable Housing GN 22 - Specialist and Supported Accommodation GN 23 - Specialist and Supported Accommodation Allocations SSA/089/01 South west of Park House, Tenby SSA/089/LDP2/01 East of Park House, Tenby SSA/135/LDP2/01North of Bulford Road Bypass, Tiers Cross SSA/088/LDP2/01 Redstone, Narberth GN 24 Gypsy and Traveller Site Allocations GT/095/LDP2/01 Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site GT/095/LDP2/02 South of Monkton Playing Field GN 25 - Gypsy and Traveller Sites and Pitches **GN 28 – Protection and Enhancement of the Historic Environment GN 29 – Community Facilities GN 30 – Community Facility Allocations** CF/040/01 New Primary School, Slade Lane, Haverfordwest Screened under Policy GN 16 - Slade Lane allocation. CF/086/LDP2/01 New Primary and Secondary Schools, Milford Haven GN 31 - Retail and Commercial Centre Development

GN 32 - Out-of-Centre Retail and Commercial Development

GN 34 - Conversion or Change of Use of Agricultural Buildings

GN 33 - Farm Diversification

#### **General Policy**

#### GN 35 - Marinas

#### **GN 36 - Transport Routes and Improvements**

This policy has two elements.

Part 1 provides a criteria-based approach for the evaluation of new transport schemes.

Part 2 identifies the main proposals in the Plan area for improvements to the transport network and, wherever the routes for these are known, to safeguard them from other developments that might compromise their implementation.

TS/LDP2/03 Road & Footpath Well Hill improvement, Pembroke Well Hill - Pembroke

TS/LDP2/08 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Bus Station

#### **GN 37 - Working of Minerals**

This policy has two parts.

Part 1 sets out the criteria for considering minerals development.

Part 2 allocates the site at Trefigin for sand and gravel extraction. Part 1: Screened out:

Part 2: The site allocation at Trefigin is screened below.

MN/000/LDP2/001 Trefigin Quarry extension

#### **GN 41 Protection of National Statutory Environmental Designations**

**GN 54 - Visitor Attractions and Leisure Facilities** 

GN 55 - Serviced and Hotel Accommodation

**GN 56 – Caravan, Camping and Chalet Development** 

**GN 57 – Site Facilities on Existing Caravan and Camping Sites** 

#### **GN 58** Self-Catering Accommodation

#### **GN 59 - Waste Management Facilities**

The policy is in two parts.

Part 1 lists criteria for the consideration of waste management facilities.

Part 2 lists employment sites allocated under other policies of the Plan that are potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. Part 1 Screened in: Part 2 Potential sites have been screened in – see below.

S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)

S/EMP/000/00004 Waterston - tank farm and LNG

EMP/146/00001Waterston Industrial Estate

S/EMP/095/00001 Pembroke Power Station Site

S/EMP/096/00005 Kingswood Industrial Estate, Pembroke Dock

S/EMP/096/00006 Waterloo and London Road Industrial Estate, Pembroke Dock

S/EMP/000/00002 Valero Refinery, Rhoscrowther

EMP/034/00006Celtic Link Business Park, Scleddau

S/EMP/136/00001 Trecwn

EMP/030/00001Parc Gwynfryn, Crymych

GN 60 - Disposal of Waste on Land

11. To mitigate the above policies, the wording of SP12 *Maintaining and Enhancing the Environment* must be amended to include the requirements for all allocations, both residential and non-residential to include a project level HRA requirement where there remains a credible risk of LSEs to European sites within 10km of the proposed development site. as is suggested by the DTA Guidelines.

- 12. The suggested wording is as follows: Within the National Site Network, which includes: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), development will only be permitted which demonstrates compliance with the Conservation of Habitats and Species Regulations 2017, and The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (and any subsequent amendments). Proposals with the potential to have Likely Significant Effects must undertake a Stage 2 Appropriate Assessment and will only be permitted if there is no adverse effect on the integrity of the National Site, either alone, or in-combination. Proposals may also be permitted where the HRA proves there are no alternatives, and that the development is of overriding public interest (IROPI) and appropriate compensatory measures are secured.
- 13. Additionally, adverse effects on site integrity will be mitigated by the amendment of the wording in GN41 *Protection of National Statutory Environmental Designations*. The current 50m buffer for National designated sites is not sufficient to assess impacts. An appropriate zone of influence should be determined during environmental assessments, such as Preliminary Ecological Appraisals, taking into account the hydrological connectivity of the site to the proposed works, the scope of the works, and the presence of mobile species. It is recommended that a general buffer of 10km is used. Additional consideration should be taken for mobile species such as bats, chough, and sites that have hydrological connectivity to sites.
- 14. By including specific wording requiring project level HRAs, there will be no adverse effect as HRAs at the project level will determine the level of mitigation and or compensation required to mitigate for contaminants, sediment deposition, loss of functionally linked land, dust, and project level disturbance concerns that may arise from the allocations in the LDP2. Examples of this mitigation can be found in the Mitigation and Compensation Opportunity in Marine Consenting Report<sup>20</sup> and the Pollution Control Construction Site Handbook<sup>21</sup>. It should be noted that this is not an exhaustive list of possible mitigation. All mitigation measures will be assessed during a project level Appropriate Assessment.
- 15. As such, the mitigation above avoids adverse effects on designated sites for the aforementioned impact pathways.

#### Recreation

16. The following European sites have been screened in due to residential allocations being located within 7km of the site (**Table 5.1**). Where a residential allocation has been identified within the zone of influence, the increased population has been estimated using a population of 2.4 per dwelling or unit as per the National Statistics population estimations<sup>22</sup>. A full list of allocations screened in for

<sup>20</sup> ABPmer, (2020). Mitigation and Compensation Opportunity in Marine Consenting, ABPmer Report No. R.3385. A report produced by ABPmer for Welsh Government, March 2020.

<sup>21</sup> Shared Regulatory Services Wales (2018) Pollution Control Construction Site Handbook.

SRS PollutionControlHandbook ConstructionA4 E

<sup>22</sup> Household and resident characteristics, England and Wales - Office for National Statistics (ons.gov.uk)

recreation can be found in Appendix C. These may give rise to additional recreational use / pressure on the listed sites.

Table 5.1 Designated Sites screened in for recreational LSE

	Designated Site	Total	Total Number of	Population
	<b>3</b>	Allocations	units	Increase
1.	Bristol Channel Approaches SAC	15	550	1320
2.	West Wales Marine SAC	10	482	1157
3.	Afon Teifi SAC	4	112	269
4.	Afonydd Cleddau SAC	26	1188	2851
5.	Carmarthen Bay SAC	6	118	283
6.	Pembrokeshire Marine	43	1933	4639
7.	Cardigan Bay	2	78	187
8.	Gweunydd Blaencleddau	3	49	118
9.	Limestone Coast SAC	20	879	2110
10.	North Pembrokeshire Woodlands SAC	4	269	646
	North West Pembrokeshire Commons SAC			
11.	Preseli SAC	5	101	242
12.	St David's SAC	4	272	653
13.	Yerbeston Tops SAC	7	239	574
14.	Pembrokeshire Bat Sites and Bosherston Lakes SAC	22	838	2011
15.	Ramsey and St David's Peninsula SPA	3	97	233
16.	Castlemartin Coast SPA	18	848	1810
17.	Carmarthen Bay SPA	6	118	283
18.	Skomer, Skokholm and the Seas off Pembrokeshire SPA	8	394	946

### Marine<sup>23</sup>

- 17. Pembrokeshire Coast National Park Authority's Partnership Plan 2025 to 2029 sets out a series of policies which neatly summarise the partnership approach in West Wales to management of marine environment. Policy E2 refers to the need to conserve and enhance marine biodiversity, Policy E1/D refers managing invasive non-native and/or harmful species and pathogens; Policy E2/A refers to the need to deliver management schemes for the marine UK National Site Network; E2/C refers to improving the environmental state of the Milford Haven Water Way; E2/e refers to delivering the management objectives of the Skomer Marine Conservation Zone; E2/G refers to managing recreational disturbance to wildlife, e.g., through codes of conduct, restrictions, awareness raising and legal enforcement.
- 18. The condition assessment for Pembrokeshire Marine SAC<sup>24</sup> and Cardigan Bay SAC<sup>25</sup> have identified that the grey seal component of the SAC is in favourable condition with a growing population. The seals the make up the SACs population are connected to a wider population in Southwest England and Wales. It was noted in the condition assessment that seals are tolerant to disturbance and pupping sites are not adversely impacted by human activities. Although bycatch levels are considered high outside the site, populations and ranges are increasing.
- 19. Cardigan Bay SAC and Pembrokeshire Marine SAC have a website<sup>2627</sup> highlighting the steps to be taken in the event that the public encounters a seal. Additionally, there are visitor centres and signage within high foot traffic areas to educate the public on seal disturbance.
- 20. Recreational boat users in Cardigan Bay SAC and Pembrokeshire Marine SAC must follow the relevant Marine Codes (North and West Wales Marine Code/Ceredigion Marine Code<sup>28</sup> and the Pembrokeshire Marine Code<sup>29</sup> respectively). The codes apply to all water users inside the relevant European Sites and Pembrokeshire National Park. The Codes have specific mitigation to reduce recreational disturbance for cetaceans (including underwater noise), seals, sea birds, and habitats. As the Pembrokeshire Marine SAC overlaps the Bristol Approaches SAC, the Marine Code still applies. West Wales Marine SAC is within the Pembrokeshire National Park and the Pembrokeshire Marine Code applies. In addition to these codes, the risk is actively being managed by the adherence to other wildlife codes of conduct e.g the WiSe scheme http://www.wisescheme.org/).

<sup>&</sup>lt;sup>23</sup> Cardigan Bay SAC, West Wales Marine SAC, Pembrokeshire Marine SAC, Carmarthen Bay SAC and Bristol Channel Approaches SAC Skomer, Skokholm and the Seas off Pembrokeshire SPA

<sup>24</sup> Natural Resources Wales (2018) Pembrokeshire Marine / Sir Benfro Forol Special Area of Conservation Indicative site level feature condition assessments 2018. NRW Evidence Report No: 233

<sup>25</sup> Natural Resources Wales (2018) Cardigan Bay / Bae Ceredigion Special Area of Conservation Indicative site level feature condition assessments 2018 NRW Evidence Report No: 226

<sup>26</sup> Cardigan-Bay-Marine-Code.pdf (cardiganbaysac.org.uk)

<sup>27</sup> Home | Pembrokeshire Marine Special Area of Conservation (pembrokeshiremarinesac.org.uk)

<sup>28</sup> Cardigan-Bay-Marine-Code-ENG.pdf (wildseas.wales)

<sup>29</sup> Pembrokeshire Marine Code | The Codes

- 21. In addition to the codes, there is the *Voluntary Agreement for the Protection of Sensitive Habitat Zones of Subtidal Seagrass and Maerl in Milford Haven*<sup>30</sup> aimed to protect habitats within the SAC from mooring and anchoring activities. This agreement took effect in 2014 and includes Milford Haven Users Association and Relevant Authorities Group. Within Pembrokeshire Marine SAC, the Port of Milford Haven installed visitor mooring buoys to deter anchoring in sensitive habitats including sea grass and maerl beds in accordance with the aforementioned agreement. This risk is actively being managed by the adherence to wildlife codes of conduct (e.g the WiSe scheme http://www.wisescheme.org/).
- 22. Skomer, Skokholm and the Seas off Pembrokeshire SPA: Visits to Skomer island via the Skomer boat are booked via the Wildlife Trust of South and West Wales who manage visitor numbers to the island.
- 23. Recreational net fishing in Wales occurs at a very low density and has been shown to have little to no bycatch.

Given all of the existing management measures to reduce the effect of recreation there will be no adverse effect to the integrity of the site from the increased population within 7km of these sites.

<sup>30</sup> Protection Zones for seagrass and maerl beds (pembrokeshiremarinesac.org.uk)

# **Terrestrial**

24. Mitigation for recreational impacts for terrestrial sites can be seen below in **Table 5.2**. The full list of allocations that lead to screening in for LSE to each European Site can be found in Appendix C.

Table 5.2 Appropriate Assessment for recreational impacts at terrestrial European Sites.

European Site	Mitigation
St David's SAC	There are walking paths near the site managed by the National Trust and the RSPB, likely reducing disturbance to the designated habitat features as recreational users will use the designated walking trails available to them. The site is also managed by the RSPB, managing the number of visitors to the site via car parks and visitor centres. The National Trust website for Pembrokeshire <sup>31</sup> has educational information regarding dog-walking and ground nesting birds, asking that visitors follow the Canine Code <sup>23</sup> , ensuring their dog is on a lead and under control. The site is not designated for ground nesting birds therefore there is limited risk of increased dog walkers.  The SAC is located within the Pembrokeshire National Park. Policy E2/G of the Pembrokeshire Coast National Park Partnership Plan 2025-2029 <sup>32</sup> states 'Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement' Policy W1/C) advises 'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.' Policy W1/G advises Manage the Milford Haven Waterway in line with recreation management objectives and relevant byelaws. This work is done by the National Park Authority often in conjunction with various partnerships.  GN 51 Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces with Amenity Value, and GN 45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.  Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.

<sup>31</sup> Visiting Pembrokeshire with your dog | National Trust

<sup>32</sup> https://www.pembrokeshirecoast.wales/wp-content/uploads/2025/03/1-Partnership-Plan.pdf

### **European Site**

### Mitigation

# Ramsey and St. David Peninsula Coast SPA

There are walking paths near the site managed by the National Trust and the RSPB. The number of visitors are limited by the car parks located at Whitesands Bay and St. David's<sup>33</sup>. There is a visitor centre in St. David's and the National Trust website for Pembrokeshire has educational information regarding dog-walking and ground nesting birds, asking that visitors follow the Canine Code, ensuring their dog is on a lead and under control. In addition. The red-billed chough nest on the coastal cliffs and caves and nesting is not associated with areas used by walkers, and thus reproductive success will not be disturbed by an increase of dog walkers. The SAC is located within the Pembrokeshire National Park. Policy E2/G of the Pembrokeshire Coast National Park Management Partnership Plan 2025-2029 states 'Manage recreational disturbance to wildlife e.g. through codes of restrictions. awareness raisina and conduct. enforcement.' Policy W1/C advises 'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion. Policy W1/G advises Manage the Milford Haven Waterway in line with recreation management objectives and relevant byelaws. This work is done by the National Park Authority often in conjunction with various partnerships.

GN 51 Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces with Amenity Value, and GN 45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.

Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.

F 0:1	NATO C
European Site	Mitigation
Yerbeston Tops SAC	There are many footpaths and recreational opportunities near the residential allocations and within Pembrokeshire Coast National Park, hence it is unlikely that recreation will be localised at the site. Pembrokeshire Coast National Park Management Plan 2025-2029  Policy W1/C advises 'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.  GN 51 Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces with Amenity Value, and GN45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.  Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.
Castlemartin coast SPA	The Pembrokeshire Coast path runs alongside the site and may decrease disturbance by keeping visitors localised. The red-billed chough is not a ground nesting bird and thus will not be disturbed by an increase of dog walkers. E2/G of the Pembrokeshire Coast National Park Management Partnership Plan 2025-2029 states 'Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.' Policy W1/C advises 'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.  GN 51 Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces with Amenity Value, and GN45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.
	Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.
Pembrokeshire Bat Sites and Bosherston Lakes SAC	Recreational use is known to erode the banks as well as increase litter and fishing line at Bosherston Lakes (Stock Pool SSSI). Bosherston Lakes runs an educational program and manages recreational pressures through active wardens and partnerships with the National trust, PCNPA, plus members of the Pembrokeshire Outdoor Charter Group and Pembrokeshire Coastal Forum). Lakeside recreation is limited to footpaths and permitted fishing season. Zones designated for otter are protected from visitors.

European Site	Mitigation	
European Oite	Felin Llwyn-gwair SSSI is a known greater horseshoe roost. There are no residential allocations within 7km of the site. Stackpole Courtyard Flats and Walled Garden SSSI is managed by the National Trust and Carew Castle SSSI is managed by the PCNPA. Policy E2/G of the Pembrokeshire Coast National Park Management Partnership Plan 2025-2029 states 'Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.' Policy W1/C advises 'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.  For portions of the site not listed above, there is sufficient recreational opportunity at Pembrokeshire Coast National Park that recreational pressure will not be localised at the site.  Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.	
North Pembrokeshire Woodlands SAC	Pengelli SSSI has walking trails and is managed by the Wildlife Trust of South & West Wales. Trails and recreation in Allt Pontfaen SSSI are managed by the Pembrokeshire Coast National Park. Policy E2/G of the Pembrokeshire Coast National Park Management Partnership Plan 2025-2029 states 'Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.'  There is limited roadside parking and designated parking at each SSSI. This would intrinsically limit the number of visitors to the site at any given time. There are also many other recreational opportunities within the Pembrokeshire Coast National Park that it is unlikely that recreation would be localised at the site.	
	GN 51Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces with Amenity Value, and GN 45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.  Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.	
Preseli SAC	Although there are residential allocations within 7km of the site, there are designated walking trails and parking locations as the site is located within the Pembrokeshire Coast National	

Furonean Site	Mitigation
European Site	Park. Additionally, there are sufficient recreational opportunities within the National Park and local area such that recreation will not become localised at the site.  Policy E1(n) of the Pembrokeshire Coast National Park Partnership Plan 2024-2025 states Implement specific projects to conserve species for which Pembrokeshire is uniquely important and local places for nature. Policy W1/C advises 'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.  GN 51 Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces with Amenity Value, and GN 45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.  Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.  Although there are residential allocations within 7km of the
Gweunydd Blaencleddau	Although there are residential allocations within 7km of the site, there are designated walking trails and parking locations
SAC	as the site is located within the Pembrokeshire Coast National Park. Additionally, there are sufficient recreational opportunities within the National Park such that recreation will not become localised at the site. GN 51 <i>Protection and Creation of Outdoor Recreation Areas,</i> GN 52 <i>Protection of Open Spaces with Amenity Value,</i> and GN 45 <i>Green Infrastructure</i> highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.  Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.
Afon Teifi SAC	There are sufficient footpaths and recreational opportunities near the residential allocations that recreational impacts are not predicted to localise at the site or infringe on the
	conservation objectives. GN 51 Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces
	with Amenity Value, and GN 45 Green Infrastructure highlight that recreational opportunities will be preserved and created
	where appropriate and will lessen the impact of recreation at European sites.
	Additionally, portions of the Pembrokeshire Coast National Park are located within 7km and offer additional recreational opportunities which are protected by the National Park Authority. Policy E2/G of the Pembrokeshire Coast National Park Management Partnership Plan 2025-2029 states

European Site	Mitigation
Limestone Coast SAC	'Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.' Policy W1/C advises 'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.  Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.
	pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.  GN 51 Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces with Amenity Value, and GN 45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.
	Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.
Afonydd Cleddau SAC	There is sufficient amenity greenspace, footpaths, and allocated recreational areas within 7km of the site. GN 51 Protection and Creation of Outdoor Recreation Areas, GN 52 Protection of Open Spaces with Amenity Value, and GN 45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites.  Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.
Northwest Pembrokeshire Commons SAC	There are sufficient footpaths and recreational opportunities near the two residential developments. GN 51 <i>Protection and Creation of Outdoor Recreation Areas</i> , GN 52 <i>Protection of</i>

European Site	Mitigation
	Open Spaces with Amenity Value, and GN 45 Green Infrastructure highlight that recreational opportunities will be preserved and created where appropriate and will lessen the impact of recreation at European sites. Policy W1/C advises 'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion. Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been identified.
Skomer, Skokholm and the Seas off Pembrokeshire SPA	A key role of island management is to limit human disturbance to breeding birds. The approach of visitors, staff and researchers to nest sites could cause disturbance. Visits to Skomer island via the Skomer boat are booked via the Wildlife Trust of South and West Wales who manage visitor numbers to the island. Information on the website covers biosecurity and taking rubbish away and the need to stay on the paths at all times. Dogs are not allowed. Skokholm is also managed by the Trust.

25. Given all of the existing management measures to reduce the effect of recreation there will be no adverse effect to the integrity of the sites, in view of the conservation objectives for each site, from the increased population within 7km of these sites.

# Water Quality: Nutrient Neutrality

### Afonydd Cleddau

26. The majority of the Afonydd Cleddau catchment is located inside the Pembrokeshire County Council boundary. A total of 17 residential allocations and 10 non-residential allocations have been planned inside the Afonydd Cleddau catchment. In addition, 7 sites within the catchment have been safeguarded for continued employment use to allow intensification of the site or re-use in the event that the existing occupier were to vacate a site.

### 27. The sites fall into one of three categories:

- They either utilise Waste water Treatment Works that discharge downstream of the riverine SAC,
- or the Waste water Treatment Works has an environmental permit that has capacity to accommodate additional foul flows within the phosphorous limit that has been imposed,
- or they will utilise a non-mains drainage solution.

- 28. Nutrient related water quality impacts within the Afonydd Cleddau SAC and Afon Teifi SAC were found to lead to adverse effects on the aforementioned European sites. To mitigate the increase in TP to the Cleddau catchment, it was initially thought that all developments that may result in an increase in nutrients to the aforementioned catchments would have to demonstrate that they are nutrient neutral to satisfy the requirements of the Habitat Regulations. However, following review of Environmental Permits for WwTWs in the affected catchments, the Council is now required to consult with the water company, Dwr Cymru Welsh Water, to establish whether future developments proposed by the Plan can take place within the newly imposed limits, rather than to demonstrate nutrient neutrality. PCC has done this and the outcome has been that such capacity has been found to be available at all the WwTWs in the affected riverine catchments where new allocations (particularly for residential development) are proposed. NRW will then monitor operational compliance of the water company at the WwTWs, to ensure that the new permit limits are being adhered to. Nonetheless, the protection of river water quality remains an important matter and this is reflected in the wording of LDP 2 policy GN 47 Water Quality and Protection of Water Resources. In some instances project level HRA may still be needed in conjunction with development proposals on allocated sites (particularly those for residential development) reflecting the need to also consider surface water disposal aspects and CSOs).
- 29. The Environmental Permits have been reviewed in light of NRW's phosphate targets set in 2019 that apply to river sub-catchments and Dŵr Cymru/Welsh Water's source apportionment work, which calculated the percentage impact of WwTW in context of the impact of other sources of phosphates entering the rivers. The phosphorous limit was then set based on the impact of each WwTW, with an interim limit imposed when it was considered that the WwTW should have a lower limit, as this allows time for upgrade works to be undertaken.
- 30. Following liaison with representatives of DCWW, it has been established that at the time of writing all impacted WwTWs have capacity within the current environmental permit limits, and it has been accepted that DCWW will ensure compliance with lower limits required by a future date where applicable. As stated in NRW 'Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation', the Local Planning Authority will need to consult DCWW when an application is submitted to gain formal confirmation that there is capacity in place to accommodate the additional wastewater in compliance with revised permit limits. The formal confirmation from DCWW must also state that the sewer network and associated WwTW have hydraulic capacity for new connections without leading to an increase in the environmental impact of storm overflows.
- 31. The tables below **(5.3 and 5.4)** identify the affected sites and their drainage status. It should be noted that whilst a number of allocations would use WwTWs discharging outside of the riverine SAC, the West Wales Nutrient Calculator (or

- relevant calculator) will need to calculate the change of land use in terms of changing the surface water regime and its ability to absorb phosphorous through the soil, as a Sustainable Drainage System may not achieve adequate mitigation.
- 32. For employment sites using private drainage systems, consideration at the project level HRA will need to be given as to whether or not the site would employ the local population and have a neutral impact or if it would draw from a wider pool of people from outside the catchment. A TLSE concludes that the scale and allocation of EMP/088/LDP/01 as a 1.88Ha local employment site suggests that it would employ from within the catchment and can be screened out. However, the scale and allocation of S/EMP/136/00001 as a 17.74 Ha Strategic Employment Site suggests that it would employ from outside the catchment and a project level HRA will be required.

Table 5.3 Residential allocations and drainage status related to the Afonydd Cleddau SAC.

Allocation	Site Name and Settlement	Wastewater Treatment Works and Status
HSG/040/LDP2/1	Former Community Education Centre, Dew Street, Haverfordwest	Merlins Bridge WwTW – Outside SAC
S/HSG/040/LDP2/6	Slade Lane, Haverfordwest	Merlins Bridge WwTW – Outside SAC
HSG/088/LDP2/1	West of Bloomfield Gardens and North of Adams Drive & Highfield Park, Narberth	Narberth WwTW – Outside SAC
HSG/053/LDP2/01	Between Longstone Court and 62, St. Davids Road, Letterston	Letterston WwTW  – Environmental Permit with capacity
HSG/022/LDP2/1	Land at Dungleddy Court, Clarbeston Road	Clarbeston Road – Environmental Permit with capacity
HSG/029/00014	Opposite Woodholm Close, Crundale	Crundale draining to Merlin's bridge WwTW - Outside SAC
HSG/029/LDP2/1	West of Ashford Park, Crundale	Crundale draining to Merlin's bridge WwTW - Outside SAC
HSG/081/LDP2/1	West of Globe Inn, Maenclochog	Maenclochog WwTW  – Environmental Permit with capacity
HSG/049/LDP2/1	East of Brookfield Close and West of Bridge Lane, Keeston	Keeston WwTW  - Environmental Permit with capacity
HSG/119/LDP2/1	Between Cornerways and Austalise, Simpson Cross	Keeston WwTW  - Environmental Permit with capacity / Newgale WwTW - Outside SAC. Could use either WwTW due to site location
HSG/149/LDP2/1	Land at Ford Farm, Wolfscastle	Wolfscastle WwTW  – Environmental Permit with capacity
HSG/120/00018	Northwest of Wesley Way, Spittal	Spittal WwTW

Allocation	Site Name and Settlement	Wastewater Treatment Works and Status
		Environmental Permit with capacity
HSG/113/LDP2/1	South of Robeston Court, Robeston Wathen	No Mains Drainage – Private Treatment System
HSG/152/LDP2/1	South of Bro'r Dderwen, Clunderwen	Clunderwen WwTW  - Environmental Permit with capacity
HSG/060/LDP2/1	Adjacent to Maesybryn, Llandissilio	Clunderwen WwTW  - Environmental Permit with capacity

33. With regard to Table 5.4 below once allocations on the edge of the SAC are discounted, on the basis that they can discharge foul water outside of the catchment, only the Gypsy Traveller site allocation at Withybush remains. This site, reference GT/040/LDP2/01 presents an opportunity for an overall reduction in phosphate output if the septic tank serving the existing site is replaced with a packaged treatment plant within the allocated site to serve both the existing and new pitches. A project level HRA will be required to assess this option and investigate this further.

Table 5.4 Other allocations and drainage status to the Afonydd Cleddau SAC.

Allocation	Site Name and Settlement	Allocation Type	Wastewater Treatment Works
S/EMP/040/00012	Withybush cluster (North Estate), Haverfordwest	Safeguarded Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00005	Withybush cluster (East of Lodge Estate), Haverfordwest	Safeguarded Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00015	Withybush cluster (Lodge Estate), Haverfordwest	Safeguarded Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00011	Withybush cluster (East Estate), Haverfordwest	Safeguarded Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00004	Withybush cluster (Trading Estate), Haverfordwest	Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00001	Withybush cluster (East of Lodge Estate), Haverfordwest	Strategic Employment	Merlins Bridge WwTW, outside SAC
EMP/040/LDP2/01	Withybush Showground, Haverfordwest	Employment	Merlins Bridge WwTW, outside SAC

Allocation	Site Name and Settlement	Allocation Type	Wastewater Treatment Works
	Rushacre Enterprise Park extension, Narberth		Private Treatment Works required. Project level HRAs to determine the amount of
EMP/088/LDP/01		Employment	phosphorous to be mitigated.
EMP/053/00001	Old Station Yard, Letterston	Employment	Letterston WwTW  – Environmental Permit with capacity
S/EMP/136/00001	Former RNAD Site, Trecwn	Strategic Employment	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated.
EMP/034/00006	Celtic Link Business Park, near Scleddau	Employment	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated. Site only partly within catchment.
GT/040/LDP2/01	Land east of Withybush Gypsy and Traveller site, near Haverfordwest	Gypsy and Traveller Site	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated.
SSA/088/LDP2/01	Redstone, Narberth	Specialist and Supported Accommodation	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated. Site only partly within catchment.

### **Afon Teifi SAC**

- 34. The Afon Teifi catchment is partially inside the Pembrokeshire County Council boundary. It is located in the northeastern portion of the boundary. Two residential allocations have been planned inside the Afon Teifi catchment during the LDP2 plan period. One residential allocation will utilise a Waste water Treatment Works that discharges to a non-SAC river and one would use a Waste water Treatment Works that has a revised environmental permit, for which DCWW have indicated there is capacity to accommodate additional foul flows within the phosphorous limit that has been imposed.
- 35. No-non-residential allocations are proposed inside the catchment during the plan period.
- 36. As such, there will be no input of phosphates to the SAC (**Table 5.5**).

Table 5.5 Allocations located inside the Afon Teifi catchment.

Allocation			Wastewater Treatment Works
HSG/020/LDP2/1			Cilgerran WwTW – Environmental
	Fields, Cilgerr	an	Permit with capacity
HSG/006/00003		Hafod,	Blaenffos WwTW (Outside SAC) -
	Blaenffos		Outside SAC

# Air Quality

- 37. Impacts from air quality were screened in at Likely Significant Effect (LSE) stage for all sites with 10km. Four sites were screened in for further assessment. Both Pembrokeshire Marine and SAC and Afon Cleddau SAC due to main roads sitting within 200m of the SAC. North Pembrokeshire Woodlands SAC and Preseli SAC on basis of precautionary application of criteria in methodology.
- 38. Summary table of LSE decision, and AA where relevant.

Table X.X.X: Sites within 200m of roads affected by Local Development Plan growth

European site	Roads within 200m	Distance to nearest site boundary	Credible evidence of a real risk against methodology?	
Afonydd Cleddau SAC	A40	The A40 crosses over the Afonydd Cleddau SAC	Screened in for woodland habitat only.  N Critical load data is not available for the remaining habitat types – these features are not considered inherently sensitive.  Woodland habitats are located within 200m of the A40. –  1188 Units in plan policies  Credible risk of LSE – screen in.  AA taken forward.	
Afon Teifi SAC	(A, B / minor roads)	adjacent	Site with 200m of roads in multiple places Site is designated for freshwater habitats and species. Features not considered inherently sensitive.  112 units There are no critical loads for rivers, moreover the key nutrient issue in the watercourse is run-off of phosphorus which does not come from traffic emissions. No credible risk of LSE	
Bristol Channel SAC		Х	Site is not located within 200m of any roads. As such, no credible risk that LSE is predicted	
West Wales Marine SAC	X)	adjacent	Site is not located within 200m of any roads. As such, <b>no credible risk of LSE is predicted</b> .	
Carmarthen Bay Dunes SAC	London Road in Pembroke Dock	adjacent	Roads within 200m of the site Only within 200m at very westward edge of sites. No allocations associated with likely commuting routes within 200m of the dunes. No credible risk of an LSE.	
Carmarthen Bay SAC	A477 near Milton	adjacent	Site is designated for marine habitats and species. Features are not considered inherently sensitive to air pollutants. There are no CLs for these features No credible risk of LSE	
Pembrokeshire Marine SAC	A477, A4076 and A4075.	Distance to salt marsh boundary. The A4075 is 3m, A477 is 15m, A4076 is 34m	A road adjacent to site. Screened in for Atlantic salt meadows / saltmarsh habitat only. Other features not considered inherently sensitive. N Critical load data is not available for the remaining habitat types. Saltmarsh is located within 200m of the A477, A4076 and A4075. 19334 units, giving rise to additional traffic flows. At A477 – road crosses site – small area. LSE is predicted. Take forward to AA	

European site	Roads within 200m	Distance to nearest site boundary	Credible evidence of a real risk against methodology?
Cardigan Bay SAC	N		No roads located within 200m.  No credible risk that LSE predicted.
Gweunydd Blaencleddau SAC	Y	Adjacent in places	Site is located near to minor roads, site boundary adjacent in some places. Four discrete locations. Scale of residential development in plan policies = only 49 units close to site Increase in traffic may results adjacent to site boundary. Site exceeded – but traffic is not the key source of pollution. In view of the JNCC guidance on scale of triggering of 1% CL exceedance and the scale of residential developments that may given rise to additional AADT = no credible risk LSE is not predicted
Limestone Coast SAC	Y		Site is within 200m of a road but there are no qualifying habitats present within this zone of influence.  No credible risk of LSE.
North Pembrokeshire Woodlands SAC	N A487	Minor Road crosses through site for roughly 2.3 km	Road within 200m of site A road runs adjacent / through the site. 269 units within 7km of the site.  Minor roads less likely to receive increase traffic – other A roads more likely  Screened in for Northern Atlantic wet heaths only which are near to the A487 although the A487 is 575m away.  Credible risk of LSE 2023 AADT circa 3201 on A 487 269 units within 7.0k  Very low contribution from road sources compared with livestock sources.  On basis of distance from road, very small zone impacted, no credible risk from increase traffic flows on A487 and on minor roads the unlikely increase in traffic on the minor road.  No adverse effect on site integrity
Northwest Pembrokeshire Commons SAC	Υ		Within 200m of road A487 runs adjacent to road – but only a very small section crosses the site. Rest more than 200m away from road edge. No residential allocations close to site, that likely to give rise to significant additional traffic flows. Designated features are not sensitive to atmospheric pollution. Process contribution from roads – currently 4% from roads No credible risk of LSE
Preseli SAC	Y	Adjacent in places	Site within 200m of road Site is located adjacent to minor roads, (2008 Manual count of only 63 'all motor vehicles' Daily Traffic) 101 units within 7.0 km

European site	Roads within 200m	Distance to nearest site boundary	Credible evidence of a real risk against methodology?		
St David's			Site conditions - traffic currently 4% of total Nitrogen deposition (KgN/ha/yr) from combined UK sources. 47% from Livestock - road emissions is not the key source of pollution. Screened in No adverse effect on site integrity in view of the site conservation objectives from increase vehicle emissions from plan policies - scale of increase traffic is very small. Site is not located within 200m of any roads		
SAC			No credible risk if LSE		
Yerbeston Tops SAC			Site is adjacent to minor roads, 239 units residential allocations within 7km Contribution 4% from Road emissions Existing air quality is just below CL.  No credible risk that increase vehicle		
			emissions would cause 1% threshold exceedance		
Pembrokeshire Bat Sites and Bosherston Lakes SAC			Roads within 200m Site is adjacent to minor roads, Features & habitats not inherently sensitive air pollutants Additional housing is 838 units. Site conditions existing air quality is below CL  No credible risk of LSE		
Skomer Skokholm and Seas off Pembrokeshire SPA	Y		Roads within 200m Site is adjacent to minor roads Features not inherently sensitive. There are no CLs for these features.  No traffic impacts likely As such, no LSE is anticipated.		
Grassholm SPA	N		Site is not located within 200m of any roads.  No credible risk of LSE is anticipated.		
Ramsey and St. David Peninsula Coast SPA	N		Site is not located within 200m of any roads.  No credible risk of LSE is anticipated.		
Carmarthen Bay SPA.	Y		Site is designated for marine habitats and species. Features not inherently sensitive There are no CLs for these features No credible risk of LSE		
Castlemartin coast SPA	Minor	Adjacent	Site features – Red-billed chough – habitats not inherently sensitive to air pollutants. Existing air quality is below CL. No credible risk of LSE		

39. Air pollution levels significantly reduce within the tens of metres from the road and continues to reduce with distance. If the verge is distant from the road this will also contribute to reductions in air pollution. By 100m impacts from traffic related

air pollution on sensitive habitats is very different to those immediately adjacent to the road. In Pembrokeshire both SAC's screened in at some point are almost immediately adjacent to the road and so impacts were screened in. Only features sensitive to air pollution need to be considered as part of this assessment and only those sensitive features within 200m of the road need to be assessed. Consideration of relevant features and potential impacts on both sites are discussed below. The two main pollutants relevant to air quality are Nitrogen deposition and Ammonia. Both have been assessed below.

#### **Pembrokeshire Marine SAC**

- 40. The only relevant feature considered to be sensitive to air pollution within the Pembrokeshire Marine SAC according to APIS is Atlantic salt meadows (Glauco-Puccinellietalia maritimae). According to APIS road transport only accounts for 3.3% of sources of total Nitrogen deposition (KgN/ha/yr) from combined UK sources. The critical loads for this habitat according to APIS is 10 kgN/ha.yr for upper saltmarsh and for other, lower saltmarsh habitats a critical load of 20 - 30 kgN/ha/yr is applied. Two areas of salt marsh within 200m of a main road are London Road in Pembroke Dock and the A477 near Milton, which are classed as being of lower and mid saltmarsh respectively. The higher critical load values for both of these sites therefore apply and APIS data shows that the average total N deposition for the Pembrokeshire Marine SAC is 11.083 kgN/ha/yr (3.3% of 11.083 = 0.36 kgN/ha/yr) (with a maximum of 16.926 (3.3% of 16.926 = 0.56)kgN/ha/yr) which does not exceed the relevant critical loads. The relevant grid square data according to APIS indicates that the average total N deposition for the grid squares adjacent to (data for the actual grid square is not available) the London Road in Pembroke Dock point is 8.2kg N/ha/yr which is well below the critical loads. On the A477 near Milton, the total N deposition KgN/ha/yr for the relevant grid square is 8.3 N/ha/yr. Again, well below both the higher and lower critical loads for higher and lower saltmarsh.
- 41. There are two points, both the A4075 at Carew and on the A477 near Milton that also sit within 200m of the SAC. Here the saltmarsh is classed as mid saltmarsh. However, having put in the LDP allocation into trip generator for these locations, the Average Annual Daily Traffic flow will fall far below the 1000 AADT threshold provided by NRW, with Carew and Milton likely receiving 269 and 665 respectively (Table 5.3 in JNCC (2021) Guidance on Decision-making Thresholds for Air Pollution). It is therefore not considered that this relatively small additional daily flow of traffic, along with the low percentage contribution of road traffic contributing to overall nitrogen deposition in the SAC, will impact upon the saltmarsh habitats in these locations. For full clarity, the total N deposition for the A4075 at Carew is the same as that on the A477 near Milton, according to APIS is 8.3 kgN/ha/yr.
- 42. Although aerial ammonia concentrations have risen in Wales in recent years, this is largely due to changes in agricultural practice (>90% of ammonia

emissions coming from agriculture according to NRW). In the context of this HRA impacts from additional traffic flows have been considered. Ammonia Critical levels (ug m-3) are given for Atlantic salt meadows, Coastal lagoons, Estuaries and mudflats and sand flats not covered by seawater at low tide. The critical level on APIS is 1 or 3. Where lichens and bryophytes form a key part of the ecosystem integrity an annual mean of 1 µg/m³ applies, however where other vegetation is concerned (which is the case for the relevant features listed above, a critical level of 3 ug/m3 is applied. For the Pembrokeshire marine SAC the ammonia concentration ug/m3 does not exceed 1.48 in any grid square and the specific points at which the main road sits within 200m of the SAC, a concentration of 1.1 is not exceeded. The site average is 0.866. Taking in to account the main source of ammonia being agriculture and the number of additional daily traffic flows as discussed above, along with the evidence that current concentrations of ammonia for the Pembrokeshire Marine SAC remaining well below the critical level of 3 ug/m3, it is considered that there will be no significant additional contributions to ammonia levels from the proposed plan.

- 43. In addition to the above, Welsh Government (WG) has published a route map for decarbonisation across the Welsh public sector by 2030 and according to the Air Quality in Wales 2020 report, the long-term trend for nitrogen dioxide has been showing a steady improvement (i.e. it is reducing) since the 1990's.
- 44. It is therefore considered that the level of development in the area will not cause a significant increased contribution to nitrogen deposition from road transport. Where a proposal has the potential to result in an increase in road traffic this will be assessed via independent project level HRA.

### Afon Cleddau SAC

- 45. The only feature within 200m of a main road that could be considered sensitive to Nitrogen deposition from road traffic is Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*. However, due to this habitat being generally associated with nutrient rich habitats and alder trees being known to support nitrogen-fixing bacteria, high levels of nitrogen in the soils associated with this habitat are considered normal and so are not sensitive to nitrogen deposition. This is supported by APIS, which does not list Alluvial woodland as being sensitive to Nitrogen. Again, it is therefore considered that the level of development in the area will not cause a significant increased contribution to nitrogen deposition from road transport. (JNCC Report No. 696 Main Report Guidance on Decision-making Thresholds for Air Pollution) Where a proposal has the potential to result in an increase in road traffic this will be assessed via independent project level HRA.
- 46. In terms of ammonia, again, the only feature sensitive to ammonia within 300m of a main road are alluvial forests. It is considered that both bryophytes and lichens are integral for this habitat and so the critic level of 1 ug/m3 applies. The only point at which alluvial woodland is present within 200m of a main road is on the

A40 near Rudbaxton. The relevant grid square average for this location is 1.9 ug/m3 and so the critical level is exceeded. Road source emissions of ammonia are small, and although there may be a small contribution to an existing exceedance of the critical level in this location, it is important to consider this in the context of other factors which may be having a greater effect on the ability of the site to support its features of interest. Consideration for how small increments from traffic might undermine the conservation objectives to 'restore' (or improve) is therefore necessary. 90% of ammonia emissions are known to be from agricultural sources and given the intensive agricultural nature of the Pembrokeshire, particularly within close proximity to the relevant location on the A40 near Rudbaxton, the main reason for the critical level being exceeded for the Cleddau Rivers SAC can be attributed to agricultural sources. The road at this point intersects the woodland for approximately 420m and so any emissions from road traffic could have an impact upon this section of woodland (as discussed above, the distance at which traffic emissions impact habitats decreases rapidly from the road edge). Although contributing to an exceedance, the impact would be very localised to a small area of the alluvial woodland and would be unlikely to contribute to the ability of any future national or local initiatives to reduce agricultural ammonia emissions from restoring favourable conservation status of the woodland feature. For that reason, it is considered that any small increase in road traffic associated with the LDP would not have an adverse impact upon the integrity of the SAC.

# GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)

47.A specific commentary is provided on the above policy to take account of the Habitats Regulations Assessment carried out on behalf of Welsh Government<sup>34</sup>. It is recommended that Policy GN6 includes reference to ensuring that proposals which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW 12 and TAN 5).

### Mitigation measures for the Trefigin Quarry Site Allocation (MN/000/LDP2/001)

48. The site is not adjacent or near to a SAC, potential impacts could arise via groundwater/water courses. However, any extension to the site would also be subject to policies SP 12 and GN 41 as proposed for amendment under General Mitigation Measures above. Also Policy GN 47 Water Quality and Protection of Water Resources will be relevant.

https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040-habitats-regulationsassessment.pdf

# 6. The Integrity Test - Conclusion

50. If the mitigation measures described in Section 5 above can be imposed and implemented, then it can be reasonably concluded that the LDP2 will not have an adverse effect on the integrity of the European sites listed below:

Bristol Channel Approaches SAC	Preseli SAC		
St David's SAC	Gweunydd Blaencleddau SAC		
Ramsey and St David's Peninsula Coast SPA	Afon Teifi SAC		
Carmarthen Bay SPA	Cardigan Bay SAC		
West Wales Marine SAC	Carmarthen Bay SAC		
Yerbeston Tops SAC	Limestone Coast SAC		
Castlemartin Coast SPA	Carmarthen Bay Dunes SAC		
Pembrokeshire Bat Sites and Bosherston Lakes SAC	Pembrokeshire Marine SAC		
North Pembrokeshire Woodlands SAC	Afonydd Cleddau SAC		
Skomer Skokholm and Seas off	Northwest Pembrokeshire		
Pembrokeshire SPA	Commons SAC		

- 51. All Plans and Policies will be mitigated if the measures described in Section 5 can be imposed and implemented. Individual allocations will be mitigated through project level HRAs to ensure that there is no adverse effect. As such, the LDP2 will lead to no adverse effect on European Sites listed above.
- 52. The table below provides a summary of the edits to the Plan required to provide mitigation:

magadom.	
SP12 Maintaining	Add to the end of Policy SP 12: Within the National Site Network, which includes: Special Areas of
and	Conservation (SACs) and Special Protection Areas
Enhancing the	(SPAs), development will only be permitted which
Environment	demonstrates compliance with the Conservation of
	Habitats and Species Regulations 2017, and The
	Conservation of Habitats and Species (Amendment)
	(EU Exit) Regulations 2019 (and any subsequent
	amendments). Proposals with the potential to have
	Likely Significant Effects must undertake a Stage 2
	Appropriate Assessment and will only be permitted if
	there is no adverse effect on the integrity of the
	National Site, either alone, or in-combination.
	Proposals may also be permitted where the HRA
	proves there are no alternatives, and that the
	development is of overriding public interest (IROPI)
	and appropriate compensatory measures are secured.
i	Journal Ca.

GN41 Protection of National Statutory Environmental Designations.	Proposals likely to have a direct or indirect adverse effect on Special Areas of conservation (SACs), Special Protection Areas (SPAs) will be subject to a Habitats Regulation Assessment.
GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)	It is recommended that Policy GN6 includes reference to ensuring that proposals which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW 12 and TAN 5).

<sup>53.</sup> As such, the mitigation above avoids adverse effects on designated sites for the aforementioned impact pathways.

# 7. In Combination Assessment

## Consideration of other policies

- 54. All policies are assigned to a screening category which allows them to be screened out as unlikely to have a significant effect either alone or in-combination. With reference to the list of categories in Section 3 only category J would require further assessment of the potential for effects 'in combination'.
- 55. There is therefore no requirement for an in-combination assessment at this stage of the assessment.

## Consideration of other plans or projects

- 56. Due to the geographical nature of Pembrokeshire, the only neighbouring authorities with local development plans which could have an in-combination impact are Pembrokeshire Coast National Park Authority, Carmarthenshire County Council and Ceredigion County Council.
- 57. Both Pembrokeshire Coast National Park LDP2 HRA (dated September 2018)<sup>35</sup> the current Ceredigion adopted LDP<sup>36</sup> and Carmarthenshire County Council's emerging LDP 2 HRA (dated January 2020) including two later addenda which deal in part with the publication of Phosphates Guidance<sup>37</sup> concluded that there would be no likely significant effect either alone or combination with other plans and projects on any European sites.
- 58. The Pembrokeshire Coast National Park and Ceredigion Local Development Plans were however adopted prior to the publication of Phosphates Guidance. As detailed within version 3.1 of advice from NRW<sup>38</sup>, there has been an ongoing Review of Permits of existing Wastewater Treatment Works (WwTW) within SAC catchments throughout Wales by NRW. In accordance with the Guidance, Dwr Cymru has been consulted by the planning authority as part of Local Development Plan 2 preparation to ensure that there is capacity to treat additional wastewater arising from proposed development (i.e., proposed housing and employment allocations, planning applications currently under consideration by the planning authority (as of August 2024) and an estimate for windfall potential in the catchment area).

<sup>35</sup> LDP2HRA-CONSULTATION-FINAL-DRAFT-5-02-18.pdf (pembrokeshirecoast.wales)

https://www.ceredigion.gov.uk/resident/planning-building-control-and-sustainable-drainage-body-sab/planning-building-control/ceredigion-local-development-plan/adopted-ceredigion-local-development-plan-ldp/

<sup>&</sup>lt;sup>37</sup>https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/integrated-sustainability-appraisal-and-habitats-regulations-assessment/

https://naturalresourceswales.gov.uk/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en

59. The Pembrokeshire Coast National Park Authority and Ceredigion County Council are required to undertake similar assessments for new development proposals under their respective adopted Local Development Plans.

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- 60. The LDP2 was screened in alone for Appropriate Assessment. Mitigation measures were considered in the conclusions on adverse effect on the integrity of the sites, such as to fully mitigate for any effects.
- 61. In line with the above, there is therefore no requirement to undertake a full incombination assessment.

# 8. Appendix A Standard Mitigation and Avoidance Measures

### Overview

- 62. The 'avoidance measures' that may be applied to the options are detailed below, and are grouped as follows:
  - General Measures (project-level HRA.) which will be applied to all developments that may lead to Likely Significant Effects on Habitat Network Sites
- 63. These measures will be applied unless project-level HRAs or project-specific environmental studies demonstrate that they are not required (i.e. the anticipated effect will not occur), not appropriate, or that alternative or additional measures are necessary or more appropriate.
- 64. Note that these measures are not exhaustive or exclusive and must be reviewed at the project stage, taking into account any changes in best-practice as well as scheme-specific survey information or studies.

## General Measures and Principles

- 65. All developments will be subject to project-level environmental assessment as they are brought forward, which will include assessments of their potential to affect European sites during their construction or operation. These assessments will consider or identify (inter alia):
  - opportunities for avoiding potential construction effects on Habitat Sites to ensure no adverse effects occur through the project level HRA. Including, but not limited to:
  - Surveying and monitoring of species for which a European site is designated to identify the species-specific risk associated with allocations and the scale of mitigation required in order to have no adverse effects.
  - Designing construction plans to avoid species specific effects where reasonable (e.g. completing construction outside the breeding bird season to reduce disturbance and habitat loss).
  - Acquiring species specific licenses where disturbance or habitat loss and degradation cannot be avoided (e.g obtaining bat licenses when hibernation or maternity roosts have been identified).
  - operational designs required to ensure no adverse effects occur (e.g. screening for nutrient neutrality and functionally linked habitat.) – although note that these measures can only be identified through detailed investigation schemes and agreed through the project-level HRA process.

# 9. Appendix B HRA Stage 1 Screening: Initial Review

The table below presents the HRA Stage 1 screening outcomes of allocations proposed in the Plan.

Designated Site	Designated Features	Allocations within three	esholds	Impacts
		HSG/149/LDP2/1	S/EMP/136/00001	
		S/HSG/040/LDP2/6	SPV/149/LDP2/01	
		HSG/022/LDP2/1	S/EMP/040/00001	
		HSG/040/LDP2/1	EMP/040/LDP2/01	
		HSG/029/00014	S/EMP/040/00004	Atmospheric Pollution
		HSG/113/LDP2/01	GT/040/LDP2/01	A road adjacent to site.
		HSG/119/LDP2/1	S/EMP/040/00011	Screened in for woodland habitat only. N Critical load data is not available for the remaining habitat types – these features are not considered inherently sensitive.
		HSG/060/LDP2/1	S/EMP/040/00015	Woodland habitats are located within 200m of the A40. –
		HSG/120/00018	S/EMP/040/00005	Credible risk of LSE – screen in.
		HSG/088/LDP2/1	S/EMP/040/00012	Oredible fisk of Lot – screen in.
		HSG/081/LDP2/1	EMP/088/LDP/01	AA taken forward
		HSG/029/LDP2/1	EMP/034/00006	7 V taken lorward
	3260 Water courses of plain to montane levels with the	HSG/049/LDP2/1	SSA/088/LDP2/01	Water quality (NN, pollution)
	Ranunculion fluitantis and Callitricho-Batrachion	HSG/114/LDP/01	EMP/053/00001	15 residential allocations have been identified within the catchment. See paragraph
	vegetation – favourable (maintained)	HSG/040/LDP2/3	EMP/132/LDP2/01	1.17.1 and table 6.3 for details. 13 non-residential allocations have been identified
	7110 Active raised bogs – unfavourable (unclassified)	HSG/152/LDP2/1	SPV/149/LDP2/01	within the catchment. See paragraph 1.17.1 and table 6.4 for details.
	91E0 Alluvial forests with Alnus glutinosa and Fraxinus	S/HSG/034F/LDP2/1	S/HSG/034F/LDP2/1	Construction of new development could lead to an increase in sediment and
	excelsior (Alno-Padion, Alnion incanae, Salicion albae) – unfavourable (unclassified)	HSG/053/LDP2/1	S/HSG/040/LDP2/6	contaminants into the Afon Cleddau degrading the environmental quality of the
Afanordal Oladalari	,	HSG/030/LDP/01	HSG/030/LDP/01	watercourse impacting the habitats and species for which the site is designated. The maintenance of new amenity grasslands and outdoor space such as the input of
Afonydd Cleddau SAC	1096 Brook lamprey <i>Lampetra planeri</i> – unfavourable (unclassified)	HSG/132/LDP2/1	HSG/132/LDP2/1	fertilizer may lead to an increase of nutrients to the site.
0/10	1099 River lamprey <i>Lampetra fluviatilis</i> – unfavourable	HSG/048/LDP2/1	HSG/063/00024	Functionally Linked Land / Indirect Habitat Loss
	(unclassified)	HSG/006/00003	HSG/048/00038	Included as a precaution as habitat degradation may occur through construction
	1163 Bullhead <i>Cottus gobio</i> – unfavourable	HSG/048/00038	HSG/048/LDP2/1	phases of the allocations reducing the quality of functionally linked land supporting
	(unclassified)	HSG/063/00024	HSG/135/LDP2/1	the features of the site.
	1355 Otter <i>Lutra lutra</i> – favourable (maintained)	HSG/003/LDP2/1	HSG/040/LDP2/3	No direct habitat loss is predicted.
	1095 Sea lamprey <i>Petromyzon marinus</i> – unfavourable	HSG/135/LDP2/1	HSG/093/00066	Recreation
	(unclassified)	HSG/053/LDP2/01	HSG/088/LDP2/1	26 residential allocations are located within 7km of the site with a total of 1188 units.
		HSG/113/LDP2/1	HSG/043/LDP2/1	According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population
			HSG/047/LDP2/1	increase of 2851 . LSE is predicted.
		HSG/040/LDP2/1	HSG/049/LDP2/1	Disturbance – noise and sound
		HSG/053/LDP2/01	HSG/114/LDP/01	Construction works located directly adjacent to the site and associated tributaries
		HSG/029/00014	EMP/053/00001	may lead to noise and visual disturbance to otters. As otters are highly mobile and
		HSG/029/LDP2/1	S/EMP/136/00001	travel up to 20km and raise young away from water courses, the temporary
		HSG/081/LDP2/1	EMP/034/00006	disturbance of otter via construction works it not anticipated.
		HSG/119/LDP2/1	S/EMP/000/00003	As no works are planned to the water course itself, aquatic features have been screened out.
		HSG/149/LDP2/1	S/EMP/000/00007	Solidariou dut.
		HSG/120/00018	CF/040/01	
		HSG/113/LDP2/1	CF/086/LDP2/1	
		HSG/152/LDP2/1	MXU/040/01	

Designated Site	Designated Features	Allocations within thre	esholds	Impacts
		HSG/060/LDP2/1 HSG/022/LDP2/1 S/EMP/040/00012 S/EMP/040/00005 S/EMP/040/00015 S/EMP/040/00011 S/EMP/040/00004 S/EMP/040/00001 EMP/040/LDP2/01 EMP/088/LDP/01 S/EMP/034/LDP/02 S/EMP/034/00003 S/EMP/086/LDP2/01 EMP/132/LDP2/01 EMP/093/00001 EMP/093/00001	EMP/000/LDP2/01 EMP/030/LDP2/01 GT/040/LDP2/01 EMP/088/LDP/01 SSA/088/LDP2/01 SSA/135/LDP2/01 GT/003/LDP2/01 EMP/146/00001 TS/LDP2/08	
Afon Teifi SAC	<ul> <li>3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation – favourable (maintained)</li> <li>3130 Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea – favourable (unclassified):</li> <li>1096 Brook lamprey Lampetra planeri – unfavourable (unclassified) reduced oxygen due to eutrophication</li> <li>1099 River lamprey Lampetra fluviatilis – unfavourable (unclassified)</li> <li>1106 Atlantic salmon Salmo salar – unfavourable (unclassified)</li> <li>1163 Bullhead Cottus gobio – unfavourable (unclassified)</li> <li>1355 Otter Lutra lutra – favourable (maintained)</li> <li>1831 Floating water-plantain Luronium natans – favourable (maintained) - eutrophication is an indication of unfavourable condition.</li> <li>1095: Sea lamprey Petromyzon marinus – unfavourable (unclassified)</li> </ul>	HSG/122/00035 HSG/020/LDP2/1 HSG/006/00003 HSG/030/LDP/01 EMP/030/00001 EMP/030/LDP2/01 MN/000/LDP2/001		Atmospheric Pollution  Site within 200m of roads in multiple places  Site is designated for freshwater habitats and species. Features not considered inherently sensitive. There are no critical loads for rivers, moreover the key nutrient issue in the watercourse is run-off of phosphorus which does not come from traffic emissions. NO credible risk of LSE  Water quality (NN, pollution)  Two allocations have been identified within the Teifi catchment. See paragraph 1.17.2 and table 6.5 for details. No non-residential allocations are located within the catchment.  Water quality may also be degraded by construction contaminants and sediment. This may result in negative impacts to the designated fish species.  Functionally Linked Land / Indirect Habitat Loss  No direct habitat loss is predicted as many of the allocations are outside of the catchment boundary. There may be some habitat degradation via contaminants, however, this impact pathway has been addressed in water quality.  No allocations are predicted to cause degradation to the riparian habitat required to support otter populations as they are sufficiently distant from the site.  Recreation4 residential allocations are located within 7km of the site with a total of 112units.  According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 269 LSE is predicted.  Disturbance – noise and sound  All allocations are sufficiently distant from the site. The nearest allocation is approximately 162m to the south of the site.  As such, no LSE is predicted.
Bristol Channel SAC	1351: harbour porpoise ( <i>Phocoena phocoena</i> )	HSG/050/LDP2/1	EMP/000/LDP2/01	Atmospheric Pollution

Designated Site	Designated Features	Allocations within thre	sholds	Impacts
		HSG/099/LDP2/1 HSG/132/LDP2/1 HSG/123/LDP/01 HSG/052/LDP2/1 HSG/052/00011 HSG/095/00144 HSG/095/LDP2/4 HSG/096/00238 HSG/095/LDP2/5 HSG/095/LDP2/2 HSG/095/LDP2/1 HSG/046/LDP2/1 HSG/047/LDP2/1 HSG/096/LDP2/1	EMP/132/LDP2/01 SSA/089/01 SSA/89/LDP2/01 MXU/095/LDP2/01 GT/095/LDP2/1 GT/095/LDP2/2 S/EMP/096/00004 S/EMP/096/00005 S/EMP/096/00001 S/EMP/096/00007 HSG/093/00066 HSG/066/LDP2/1 HSG/096/LDP2/1 HSG/096/LDP2/2 S/EMP/096/00003 S/EMP/096/00002 S/EMP/095/00001 GT/003/LDP2/01	Site is not located within 200m of any roads. As such, no credible risk that LSE is predicted  Water quality (pollution)  No novel contaminants or contaminants known to harm the harbour porpoise are predicted to be released into the marine environment. Most of the relevant contaminants (e.g. PCBs) have been phased out or are in the process of being phased out via the OSPAR Convention and previous EU regulations. As such, no LSE is predicted to arise from any industrial or residential development  Functionally Linked Land / Indirect Habitat Loss  As there is no development planned inside the marine area of the SAC, there will be no direct or indirect habitat loss. As such, no LSE is predicted.  Recreation  15 residential allocations are located within 7km of the site with a minimum total of 550 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 1320. LSE is predicted.  Disturbance – noise, vibration and sound  Harbour porpoise is sensitive to underwater noise and vibration. They have been found to utilize Carmarthen Bay the during summer months to feed. There are very few shipping lanes running directly through the northern section of the site.
West Wales Marine SAC	1351: harbour porpoise ( <i>Phocoena phocoena</i> )	HSG/086/LDP2/4 HSG/086/LDP2/5 HSG/086/LDP2/6 HSG/086/00222 HSG/135/LDP2/1 HSG/119/LDP2/1 S/HSG/034F/LDP2/1 HSG/122/00035 EMP/034/00006 EMP/053/00001 S/EMP/034/LDP/02 S/EMP/034/LDP/02 S/EMP/034/LDP2/01 S/EMP/040/00001 EMP/040/LDP2/01 S/EMP/000/00003 SSA/135/LDP2/01 S/EMP/086/LDP/01 SPV/066/LDP2/01 S/EMP/000/00002 S/EMP/086/00003	S/EMP/095/00001 S/EMP/000/00004 S/EMP/086/LDP2/01 S/EMP/096/00003CF/0 86/LDP2/1 HSG/095/LDP2/1 HSG/096/LDP2/1 HSG/096/LDP2/2 HSG/096/LDP2/2 HSG/096/LDP2/1 HSG/086/LDP2/1 HSG/086/LDP2/1 HSG/086/LDP2/2 S/HSG/086/LDP2/3 HSG/086/LDP2/7 HSG/048/00038 HSG/048/LDP2/1 HSG/040/LDP2/1 HSG/040/LDP2/1 HSG/040/LDP2/1 S/HSG/040/LDP2/1 S/HSG/053/LDP2/1 HSG/114/LDP/01 EMP/146/00001	Atmospheric Pollution Site is not located within 200m of any roads. As such, no credible risk of LSE is predicted.  Water quality (pollution) No novel contaminants or contaminants known to harm the harbour porpoise are predicted to be released into the marine environment. Most of the relevant contaminants (e.g. PCBs) have been phased out or are in the process of being phased out via the OSPAR Convention and previous EU regulations. As such, no LSE is predicted to arise from any industrial or residential development.  Disturbance – noise and sound Harbour porpoise is sensitive to underwater noise and vibration. They have been found to utilise all of the site during summer and a portion at the north end of the site in summer.  The site is located approximately 3km from Haven North and 5km from Haven South. Increased port development will allow for additional freighters entering the Haven Waterway which passes through the site.  Fishguard Harbour is located directly adjacent to the site.  An increased number of commercial and shipping vessels entering the site may lead to an increased level of underwater noise causing emotional stress and displacement resulting in LSE. This may be especially relevant as ships wait to enter Milford Haven at St Brides Bay.  Functionally Linked Land / Indirect Habitat Loss  As there is no development planned inside the marine area of the SAC, there will be no direct or indirect habitat loss. As such, no LSE is predicted.

Designated Site	Designated Features	Allocations within thresholds		Impacts
		S/EMP/096/00002	TS/LDP2/03 HSG/096/LDP2/3	10 residential allocations are located within 7km of the site with a minimum total of 482 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 1157. LSE is predicted.
	<ul> <li>2110 Embryonic shifting dunes</li> <li>2120 "Shifting dunes along the shoreline with Ammophila arenaria (""white dunes"")"</li> </ul>	F C N		Atmospheric Pollution Roads within 200m of the site Only within 200m at very westward edge of sites.
Carmarthen Bay	<ul> <li>2130 "Fixed coastal dunes with herbaceous vegetation (""grey dunes"")" * Priority feature</li> <li>2170 Dunes with Salix repens ssp. argentea</li> </ul>			No allocations associated with likely commuting routes within 200m of the dunes.  No credible risk of an LSE.
Dunes SAC	<ul><li>(Salicion arenariae)</li><li>2190 Humid dune slacks</li></ul>	of the European site		Disturbance – noise and sound  No allocations within 10km of the site. No LSE predicted.
	<ul> <li>1014 Narrow-mouthed whorl snail <i>Vertigo angustior</i></li> <li>1395 Petalwort <i>Petalophyllum ralfsii</i></li> </ul>			Functionally Linked Land / Indirect Habitat Loss No allocations within 10km of the site. No LSE predicted.
	1903 Fen orchid <i>Liparis loeselii</i>			Recreation No allocations within 7km of the site. No LSE predicted.
	Annex II species that are a primary reason for selection of this site	SSA/089/01 SSA/089/LDP2/01 EMP/132/LDP2/01 EMP/000/LDP2/01		Atmospheric Pollution Site is designated for marine habitats and species. Features are not considered inherently sensitive to air pollutants. There are no CLs for these features Water quality (pollution)
	1349 Bottlenose dolphin <i>Tursiops truncatus</i> Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site			There are several allocations, residential, community, and employment located within 10km of the site and are hydrologically connected. As such, construction contaminants and amenity management including fertilizer may reduce the quality of
Carmarthen Bay	<ul> <li>1110 Sandbanks which are slightly covered by sea water all the time</li> <li>1170 Reefs</li> </ul>	HSG/132/LDP2/1 HSG/047/LDP2/1		water in the tributaries entering Carmarthen Bay. Designated fish species using the tributaries will be impacted due to a degradation of water quality, and thus their habitat.
SAC	<ul> <li>8330 Submerged or partially submerged sea caves</li> <li>Annex II species that are a primary reason for selection</li> </ul>	HSG/050/LDP2/1 HSG/099/LDP2/1		As such, LSE is predicted for fish species.  Functionally Linked Land / Indirect Habitat Loss
	of this site  • 1095 Sea lamprey <i>Petromyzon marinus</i>	HSG/123/LDP/01 HSG/003/LDP2/01		As the site features are marine, no LSE is predicted.  Recreation
	<ul> <li>1099 River lamprey Lampetra fluviatilis</li> <li>1364 Grey seal Halichoerus grypus</li> </ul>	GT/003/LDP2/01 SSA/088/LDP2/01 SSA/089/LDP2/01		Six residential allocations are located within 7km of the site with a minimum total of 118 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 283. LSE is predicted.  Disturbance
			1	The site is sufficiently distant from all allocations such that no LSE is predicted.
	Annex I habitats that are a primary reason for selection of this site	HSG/029/00014 HSG/029/LDP2/1	HSG/132/LDP2/1 HSG/135/LDP2/1	Atmospheric Pollution
Dombrokoshira	Annex I Primary habitats:  1130 Estuaries  1160 Legge Shallow inlets and have	HSG/040/LDP2/1 S/HSG/040/LDP2/6	HSG/050/LDP2/1 HSG/050/LDP2/1 S/HSG/086/LDP2/3	A road adjacent to site.  Screened in for Atlantic salt meadows / saltmarsh habitat only.  Other features not considered inherently sensitive. N Critical load data is not
Pembrokeshire Marine SAC	<ul> <li>1160 Large Shallow inlets and bays</li> <li>1170 Reefs</li> <li>Annex I habitats present as a qualifying feature, but not</li> </ul>	HSG/040/LDP2/3 HSG/043/LDP2/1	HSG/152/LDP2/1 HSG/060/LDP2/1	available for the remaining habitat types.  Saltmarsh is located within 200m of the A477, A4076 and A4075.
	<ul> <li>a primary reason for selection of this site</li> <li>1110 Sandbanks which are slightly covered by sea water all the time</li> </ul>	HSG/046/LDP2/1 HSG/047/LDP2/1 HSG/048/00038	HSG/120/00018 S/EMP/000/00007 MXU/040/01	1924 units, giving rise to additional traffic flows.  At A477 – road crosses site – small area.  LSE is predicted. See AA

Designated Site	Designated Features	Allocations within thre	esholds	Impacts
	<ul> <li>1140 Mudflats and sandflats not covered by seawater at low tide</li> <li>1150 Coastal lagoons * Priority feature</li> <li>1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)</li> <li>8330 Submerged or partially submerged sea caves Annex II species that are a primary reason for selection of this site</li> <li>1364 Grey seal <i>Halichoerus grypus</i></li> <li>1441 Shore dock <i>Rumex rupestris</i></li> <li>Annex II species present as a qualifying feature, but not a primary reason for site selection</li> <li>1095 Sea lamprey <i>Petromyzon marinus</i></li> <li>1099 River lamprey <i>Lampetra fluviatilis</i></li> <li>1102 Allis shad <i>Alosa alosa</i></li> <li>1103 Twaite shad <i>Alosa fallax</i></li> <li>1355 Otter <i>Lutra lutra</i></li> </ul>	HSG/048/LDP2/1 HSG/052/00011 HSG/052/LDP2/1 HSG/063/00024 HSG/066/LDP2/1 HSG/086/00222 HSG/086/LDP2/1 HSG/086/LDP2/2 HSG/086/LDP2/5 HSG/086/LDP2/5 HSG/086/LDP2/6 HSG/086/LDP2/7 HSG/093/00066 HSG/095/LDP2/1 HSG/095/LDP2/1 HSG/095/LDP2/2 HSG/096/LDP2/2 HSG/096/LDP2/1 HSG/096/LDP2/1 HSG/096/LDP2/1 HSG/113/LDP2/01 HSG/113/LDP2/01 HSG/113/LDP2/1 HSG/113/LDP2/1 HSG/113/LDP2/1 HSG/113/LDP2/1 HSG/113/LDP2/1 HSG/113/LDP2/1 HSG/113/LDP2/1 HSG/049/LDP2/1 HSG/049/LDP2/1 HSG/049/LDP2/1 HSG/003/LDP2/1 HSG/003/LDP2/1 HSG/003/LDP2/1 HSG/0096/LDP2/1	S/EMP/040/00001 S/EMP/086/LDP/01 SSA/135/LDP2/01 EMP/132/LDP2/01 EMP/132/LDP2/01 EMP/093/00001 S/EMP/093/00001 S/EMP/000/00002 S/EMP/096/00002 S/EMP/096/00001 S/EMP/096/00007 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00001 S/EMP/096/00001 S/EMP/096/00001 S/EMP/096/00001 S/EMP/040/00011 S/EMP/040/00012 S/EMP/040/00012 S/EMP/040/00015 S/EMP/040/00001 S/EMP/040/00001 S/EMP/040/00001 S/EMP/096/00001	Water Quality  A reduction in water quality is likely to occur at the site near Milford Haven due to the large amount of port development and increase in moored boats along the coast. Development may increase turbidity and sediment concentrations of the site. Construction and operational related contaminants may also enter the waterway, reducing the quality of the site.  As such, LSE is predicted for all designated features.  Recreation  42 residential allocations are located within 7km of the site with a minimum total of 1924 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 4618. LSE is predicted.  Functionally Linked Land / Indirect Habitat Loss  An increase in commercial and recreational boats inside the Haven Waterway and along the Pembrokeshire coast may result in habitats becoming undesirable due to mooring and contaminants being expelled from ships within the site. LSE is predicted.  Disturbance  Works in Milford Haven, specifically relating to Haven South and Haven North may cause disturbance to grey seals and fish species that utilise the bay and associated tributaries inside the site. There is a significant amount of works allocated in Milford Haven, mainly employment, which will lead to LSE to the designated species mentioned above.
Cardigan Bay SAC	<ul> <li>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</li> <li>1110 Sandbanks which are slightly covered by sea water all the time</li> <li>1170 Reefs</li> <li>8330 Submerged or partially submerged sea caves</li> <li>Annex II species that are a primary reason for selection of this site</li> </ul>	HSG/122/00035 HSG/020/LDP2/1		Atmospheric Pollution  No roads located within 200m.  No credible risk that LSE predicted.  Water Quality There is hydrological connectivity between the site and a residential allocations. These allocations include Awel y Mor Extension (HSG/122/00035), and 10 open-space and amenity land allocations, many of which are directly adjacent to the Afon Teifi which drains to Cardigan Bay SAC.

Designated Site	Designated Features	Allocations within thresholds	Impacts
	<ul> <li>1349 Bottlenose dolphin Tursiops truncatus</li> <li>Annex II species present as a qualifying feature, but not a primary reason for site selection</li> <li>1095 Sea lamprey Petromyzon marinus</li> <li>1099 River lamprey Lampetra fluviatilis</li> <li>1364 Grey seal Halichoerus grypus</li> </ul>		Sediment runoff from any construction works, nutrient input from amenity land operational maintenance, and other construction contaminants may reduce the water quality of the site, thus resulting in LSE to sea lamprey, river lamprey, and reefs.  Recreation  There are two allocations within 7km of the site. These allocations propose the development of a minimum of 78 dwellings. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 187.  Grey seals and bottle-nosed dolphins may be disturbed (noise & visual) by increased recreational use of the site via human and boat disturbance. All features, with the exception of sand banks, can be disturbed by casual beach recreation and littering, thus reducing the environmental quality of the site. Increased recreation is listed as a potential pressure to the site <sup>39</sup> .  As such, LSE is predicted for grey seal, bottle-nosed dolphin, sea lamprey, river lamprey, reefs, and sea caves.  Functionally Linked Land / Indirect Habitat Loss  There will be no loss of functionally linked land as the designations are sufficiently away from the coast and do not support the marine features for which the site is designated. As such, no LSE is predicted.  Disturbance  All allocations are sufficiently distanced from the coast. As the designated features
Gweunydd Blaencleddau SAC	Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site  • 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils ( <i>Molinion caerueae</i> )  • North Atlantic wet heaths with <i>Erica tetralix</i> • Blanket Bog  • Transition Mires and quaking bogs  • Alkaline fens  Annex II species that are a primary reason for selection of this site  • 1065 Marsh fritillary <i>Euphydryas aurinia</i> Annex II species present as a qualifying feature, but not a primary reason for site selection  • Southern damselfly <i>Coenagrion mercuriale</i>	HSG/006/00003 HSG/030/LDP/01 HSG/081/LDP2/1 HSG/060/LDP2/1 EMP/030/00001 EMP/030/LDP2/01	Atmospheric pollution  Site is located near to minor roads, site boundary adjacent in some places. Four discrete locations.  Scale of residential development in plan policies = only 49 units close to site Increase in traffic may result adjacent to site boundary.  Site exceeded – but traffic is not the key source of pollution.  In view of the JNCC guidance on scale of triggering of 1% CL exceedance and the scale of residential developments that may give rise to additional AADT = no credible risk LSE is not predicted  Water Quality  The nearest allocation is 1.1 km to the north east of the site. There are three residential allocations and two employment allocations within 2km of the site in Crymych. Construction contaminants and associated works may result in a degradation of the water dependent habitats and species. Inputs of fertiliser and landscaping works may result in an increase in nutrients and eutrophication of aquatic habitats.  As such, LSE is predicted.  Recreation  Three residential allocations are located within 7km of the site with a minimum total of 49 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 118. LSE is predicted.  Functionally Linked Land / Indirect Habitat Loss

<sup>39</sup> Natural Resource Wales (2018) Cardigan Bay / Bae Ceredigion Special Area of Conservation: Indicative site level feature condition assessments 2018. NRW Evidence Report Series, Report No: 226, 39pp, NRW, Bangor. Contents (natural resources.wales)

Designated Site	Designated Features	Allocations within thresholds		Impacts
	Annex I habitats that are a primary reason for selection of this site  1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts  2130 Fixed dupos with berbacous vegetation	HSG/123/LDP/01 HSG/095/LDP2/5 HSG/095/LDP2/2 HSG/095/LDP2/1	SSA/089/01 SSA/089/LDP2/01	As it is unclear where functional habitat for the designated species is located during the planning stage, the precautionary principle will be used to protect potential roosts and foraging and commuting habitats.  As such, LSE predicted for marsh fritillary and southern damselfly only.  Disturbance  All allocations are sufficiently distanced from the site. As such, no LSE is predicted.  Atmospheric Pollution  Site is within 200m of a road but there are no qualifying habitats present within this
Limestone Coast SAC	<ul> <li>2130 Fixed dunes with herbaceous vegetation ("grey dunes")</li> <li>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</li> <li>4030 European dry heaths</li> <li>6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) / Dry grasslands and scrublands on chalk or limestone.</li> <li>8310 Caves not open to the public</li> <li>8330 submerged or partially submerged sea caves</li> <li>Annex II species that are a primary reason for selection of this site</li> <li>1304 Greater horseshoe bat Rhinolophus ferrumequinum</li> <li>1654 Early gentian Gentianella anglica</li> <li>Annex II species present as a qualifying feature, but not a primary reason for site selection</li> </ul>	HSG/095/00144 HSG/096/LDP2/2 HSG/095/LDP2/4 HSG/095/LDP2/1 HSG/099/LDP2/1 HSG/086/LDP2/1 HSG/086/LDP2/2 S/HSG/086/LDP2/3 HSG/086/LDP2/4 HSG/086/LDP2/5 HSG/086/LDP2/6 HSG/086/00222 HSG/052/LDP2/1 HSG/046/LDP2/1 S/EMP/000/00007	S/EMP/086/LDP/01 SPV/066/LDP2/01 MXU/095/LDP2/01 S/EMP/000/00003 S/EMP/000/00002 S/EMP/086/00003 S/EMP/096/00002 S/EMP/095/00001 S/EMP/000/00004 S/EMP/086/LDP2/01 CF/086/LDP2/1 GT/095/LDP2/2 EMP/146/00001 GT/003/LDP2/01	zone of influence. No credible risk of LSE.  Water quality The site is not hydrologically connected to any allocations. As such, no LSE is predicted.  Recreation 19 residential allocations are located within 7km of the site with a minimum total of 870 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 2088. LSE is predicted.  Direct Habitat Loss / functionally linked habitat loss Horseshoe bats tend to have a range of approximately 2km from the roost site and will not be constricted to the site. Although there may not be direct habitat loss to the site, there may be loss to foraging and commuting habitats and roosts outside the site but within 10km.  Disturbance (noise, visual, and vibration) The site is located 500m to the south of the nearest allocation. As such, the site is considered a sufficient distance from the nearest allocation. No LSE is predicted.
North Pembrokeshire Woodlands SAC	<ul> <li>1395 Petalwort Petalophyllum ralfsii</li> <li>Annex I habitats that are a primary reason for selection of this site</li> <li>91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</li> <li>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</li> <li>91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) * Priority feature</li> <li>Annex II species that are a primary reason for selection of this site</li> <li>1308 Barbastelle Barbastella barbastellus</li> </ul>	S/HSG/034F/LDP2/1 HSG/053/LDP2/1 HSG/006/00003 EMP/034/00006 EMP/053/00001 S/EMP/136/00001 SPV/149/LDP2/01 S/EMP/034/LDP/02 S/EMP/034/00003 EMP/030/LDP2/01 HSG/081/LDP2/1 HSG/030/LDP2/1 HSG/020/LDP2/1		Atmospheric Pollution Minor roads within 200m of site A road runs adjacent / through the site. 269 units close to site. minor road likely to receive increase traffic – other A and local minor roads more likely Screened in on a precautionary basis for Northern Atlantic wet heaths only which are adjacent to the A487 (over 200m away). No other qualifying features are present within 200m of a road. 2023 AADT circa 3201 on A 487 On basis of distance from road, no credible risk from increase traffic flows on A487 and on minor roads the unlikely increase in traffic on the minor road. No credible risk of an LSE.  Water Quality There is no hydrological connectivity between any allocations and the site. As such, no LSE is predicted.

Designated Site	Designated Features	Allocations within thresholds	Impacts
		MN/000/LDP2/001	Recreation 4 residential allocations are located within 7km of the site with a minimum of 269 units. According to the Office for National Statistics, the average household population is 2.4. As such, the total population increase is predicted to be 646.  Functional linked land
			There may be a reduction is suitable barbastelle habitat or roosting sites.
			Using the precautionary principle, LSE is predicted for barbastelle.
			Disturbance
			The site is sufficiently distanced from the allocations. As such, no LSE is predicted.
			Atmospheric Pollution Within 200m of road
			A487 runs adjacent to road – but only a very small section crosses the site. Rest more than 200m away from road edge.
	Annex I habitats that are a primary reason for selection		No residential allocations close to site, that likely to give rise to significant additional traffic flows.
	of this site		Designated features are not sensitive to atmospheric pollution.
	4030 European dry heaths 7140 Transition mires and quaking bogs		Process contribution from roads – currently 4% from roads
	Annex I habitats present as a qualifying feature, but not		No LSE is predicted.
Northwest	a primary reason for selection of this site		Water Quality
Pembrokeshire	<ul> <li>4010 Northern Atlantic wet heaths with Erica tetralix</li> </ul>		There is no hydrological connectivity between any allocations and the site.
Commons SAC	6410 Molinia meadows on calcareous, peaty or		As such, no LSE is predicted.
	clayey-silt-laden soils ( <i>Molinion caeruleae</i> )		Recreation
	Annex II species that are a primary reason for selection		There are no residential allocations within 7km of the site.
	of this site		Functional linked land
	1831 Floating water-plantain <i>Luronium natans</i>		The Brawdy allocation and two residential allocations are the only allocations located within 10km of the site.
			The Brawdy site is already developed and being extended in areas already being used for other military purposes. The residential allocations are sufficiently away from the site that habitat loss is not anticipated.
			Disturbance
			No disturbance is anticipated as the site is sufficiently distant from any allocations.
Preseli SAC	Annex I habitats present as a qualifying feature, but not	HSG/006/00003 HSG/030/LDP/01	Atmospheric Pollution
	a primary reason for selection of this site	HSG/053/LDP2/1	Site within 200m of road
	4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>	HSG/081/LDP2/1	Site is located adjacent to minor roads, (2008 Manual count of only 63 'all motor
	4030 European dry heaths	HSG/120/00018	vehicles')
	<ul> <li>7150 Depressions on peat substrates of the Rhynchosporion</li> </ul>	S/HSG/034F/LDP2/1	Site conditions - traffic currently 4% of total Nitrogen deposition (KgN/ha/yr) from combined UK sources.
	7230 Alkaline fens	HSG/149/LDP2/1	47% from Livestock – road emissions is not the key source of pollution .
	Annex II species that are a primary reason for selection of this site	HSG/060/LDP2/1 HSG/022/LDP2/1	No gradible risk of adverse affect on site integrity in view of the site assessmention
	1044 Southern damselfly (Coenagrion mercurial)	EMP/034/00006	No credible risk of adverse effect on site integrity in view of the site conservation objectives from increase vehicle emissions from plan policies
	<ul> <li>1044 Southern damselily (Coeragrion mercuriar)</li> <li>1065 Marsh fritillary butterfly Euphydryas</li> </ul>	S/EMP/136/00001	
	(Eurodryas, Hypodryas) aurinia	EMP/053/00001	Water Quality
		SPV/149/LDP2/01	

Designated Site	Designated Features	Allocations within thresholds		Impacts
	1393 Slender green feather-moss Drepanocladus (Hamatocaulis) vernicosus	EMP/030/00001 EMP/030/LDP2/01 MN/000/LDP2/001		No LSE will arise from water quality as the site is spring fed and at a higher altitude than the allocations.  Recreation  5 residential allocations are located within 7km of the site with a minimum of 101 units. According to the Office for National Statistics, the average household population is 2.4. As such, the total population increase is predicted to be 242. LSE is predicted.  Functional linked land  It is unclear where water is being supplied for the residential and employment allocations in Crymych. Abstraction of the spring water may alter water levels and degrade the habitat. Reducing its suitability for its designated species. LSE is predicted.  Disturbance  No disturbance is anticipated as the site is sufficiently distant from any allocations.
St David's SAC	Annex I habitats that are a primary reason for selection of this site  1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts  4030 European dry heaths Annex II species that are a primary reason for selection of this site  1831 Floating water-plantain <i>Luronium natans</i>	HSG/114/LDP/01 HSG/049/LDP2/1 S/HSG/034F/LDP2/1 HSG/119/LDP2/1 HSG/053/LDP2/1 EMP/034/00006 EMP/053/00001 S/EMP/034/LDP/02 S/EMP/034/00003 HSG/119/LDP2/1		Atmospheric pollution Site is not located within 200m of any roads No credible risk if LSE  Water Quality The site does not have any water-dependent features. Additionally, the site is not hydrologically connected to any allocations. As such, no LSE is predicted.  Recreation There are four residential allocations located within 7km of the site with a minimum of 272 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 653. As such, LSE is predicted.  Functionally Linked Land The Brawdy site is already developed and being extended in areas already being used for other military purposes. The residential allocations are sufficiently away from the site that habitat loss is not anticipated. LSE is not predicted.  Disturbance (Noise and Vibration) The site is sufficiently distanced from the nearest proposed allocation such that there will be disturbance via noise or vibration. As such, no LSE is predicted.
Yerbeston Tops SAC	Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site  • 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils ( <i>Molinion caeruleae</i> )  Annex II species that are a primary reason for selection of this site  • 1065 Marsh fritillary butterfly <i>Euphydryas</i> ( <i>Eurodryas</i> , <i>Hypodryas</i> ) aurinia	HSG/088/LDP2/1 HSG/003/LDP2/1 HSG/113/LDP2/01 HSG/099/LDP2/1 HSG/132/LDP2/1 HSG/047/LDP2/1 HSG/063/00024 HSG/050/LDP2/1 HSG/096/LDP2/1 HSG/093/00066 HSG/043/LDP2/1 HSG/095/LDP2/4 HSG/095/00144	S/EMP/096/00007 S/EMP/096/00004 S/EMP/096/00005 S/EMP/096/00006 S/EMP/096/00001 SSA/089/01 SSA/089/LDP2/01 EMP/132/LDP2/01 EMP/088/LDP2/01 GT/003/LDP2/01 EMP/088/LDP2/01 SSA/088/LDP2/01	Atmospheric pollution Site is adjacent to minor roads, 239 units residential allocations Contribution 4% from Road emissions Existing air quality is just below CL.  No credible risk that increased vehicle emissions would cause 1% threshold exceedance  Water Quality The site is upstream of Milford Haven and allocations. As such, no LSE is predicted Recreation

Designated Site	Designated Features	Allocations within thresholds		Impacts	
		HSG/052/LDP2/1 HSG/123/LDP/01 HSG/003/LDP2/01		There are 7 residential allocations located within 7km of the site with a minimum of 239 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 574. As such, LSE is predicted.  Functionally Linked Land  As the marsh fritillary is highly mobile, it is possible that there will be LSE to this designated feature irrespective of the allocation location.  As it is unclear where functional habitat for the designated species is located during the planning stage, the precautionary principle will be used to protect potential foraging and commuting habitats.  As such, LSE is predicted for marsh fritillary.  Disturbance (Noise and Vibration)  The site is sufficiently distanced from the nearest proposed allocation such that there	
Pembrokeshire Bat Sites and Bosherston Lakes SAC	Annex I habitats that are a primary reason for selection of this site  • 3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara spp.</i> /Calcium rich nutrient-poor lakes, lochs  Annex II species that are a primary reason for selection of this site  • 1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> Annex II species present as a qualifying feature, but not a primary reason for site selection  • 1303 Lesser Horseshoe Bat <i>Rhinolophus hipposideros</i> • 1355 Otter <i>Lutra lutra</i>	HSG/022/LDP2/1 HSG/046/LDP2/1 HSG/047/LDP2/1 HSG/050/LDP2/1 HSG/052/00011 HSG/052/LDP2/1 HSG/063/00024 HSG/066/LDP2/1 HSG/093/00066 HSG/095/LDP2/1 HSG/095/LDP2/2 HSG/095/LDP2/2 HSG/095/LDP2/2 HSG/095/LDP2/5 HSG/096/LDP2/1 HSG/096/LDP2/1 HSG/096/LDP2/1 HSG/113/LDP2/01 HSG/113/LDP2/01 HSG/123/LDP/01 HSG/086/LDP2/2 S/HSG/086/LDP2/2 S/HSG/086/LDP2/3 HSG/086/LDP2/3 HSG/086/LDP2/5 HSG/086/LDP2/5 HSG/086/LDP2/5 HSG/086/LDP2/1 HSG/086/LDP2/1 HSG/086/LDP2/2 S/HSG/086/LDP2/1 HSG/086/LDP2/1 HSG/086/LDP2/1 HSG/086/LDP2/1 HSG/086/LDP2/1 HSG/086/LDP2/1	S/HSG/040/LDP2/6 HSG/132/LDP2/1 S/EMP/040/00005 MXU/040/01 S/EMP/086/LDP/01 SPV/066/LDP2/01 EMP/000/LDP2/01 EMP/132/LDP2/01 EMP/093/00001 S/EMP/096/00002 S/EMP/096/00002 S/EMP/096/00001 S/EMP/096/00001 S/EMP/096/00001 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00005 S/EMP/096/00001 S/EMP/096/00001 S/EMP/096/00001 S/EMP/040/00011 S/EMP/040/00012 S/EMP/040/00015 S/EMP/040/00001	Atmospheric pollution Roads within 200m Site is adjacent to minor roads, Features & habitats not inherently sensitive air pollutants Additional housing is 829 units. Site conditions existing air quality is below CL  No credible risk of impacts  Water Quality Stackpole SSSI is the only portion of the site with water related features. The site is not hydrologically connected to any allocations. All other portions of the site are designated for horseshoe roosts, and thus are not affected by water quality. As such, no LSE is anticipated Recreation There are 21 residential allocations located within 7km of the site with a minimum of 829 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 1990 . As such, LSE is predicted.  Functionally Linked Land As it is unclear where functional habitat for the designated species is located during the planning stage, the precautionary principle will be used to protect potential roosts and foraging and commuting habitats. As such, LSE predicted for bats only.  Disturbance (Noise and Vibration) The site is sufficiently distanced from the nearest proposed allocation such that there will be (no?) disturbance via noise or vibration. As such, no LSE is predicted.	

Designated Site	Designated Features	Allocations within thresholds		Impacts	
Skomer Skokholm and Seas off Pembrokeshire SPA	<ul> <li>European storm petrel <i>Hydrobates pelagicus</i> Annex I (breeding)</li> <li>Red-billed chough <i>Pyrrhocorax pyrrhocorax</i> Annex I (breeding)</li> <li>Short-eared owl <i>Asio flammeus</i> Annex I (breeding)</li> <li>Manx shearwater <i>Puffinus puffinus</i> regularly occurring migratory species (breeding)</li> <li>Atlantic puffin <i>Fratercula arctica</i> Regularly occurring migratory species (breeding)</li> <li>Lesser black-backed gull <i>Larus fuscus</i> Regularly occurring migratory species (breeding)</li> <li>Seabird assemblage – seabird assemblage of importance – at least 20,000 seabirds in any season the main components are razorbill <i>Alca tarda</i> common guillemet <i>Uria aalra</i> black legged</li> </ul>	GT/095/LDP2/02 EMP/146/00001 SSA/088/LDP2/0	GT/095/LDP2/1 GT/095/LDP2/2 GT/003/LDP2/01 GT/095/LDP2/02	Atmospheric pollution Roads within 200m Site is designated for marine habitats and species. Features not inherently sensitive There are no CLs for these features No credible risk of LSE  Water Quality The site does not have any water-dependent features. Additionally, the site is not hydrologically connected to any allocations. As such, no LSE is predicted.  Recreation. There are 8 residential allocations located within 7km of the site with a minimum of 394 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 946. As such, LSE is predicted.  Functionally Linked Land There are no allocations that will result in a direct habitat loss or degradation of the	
	torda, common guillemot <i>Uria aalg</i> e, black-legged kittiwake <i>Rissa tridactyla</i> , Atlantic puffin, lesser black-backed gull, Manx shearwater and European storm petrel	HSG/096/LDP2/3		site.  Disturbance (Noise and Vibration)  The site is sufficiently distanced from the nearest proposed allocation such that there will be no disturbance via noise or vibration.	
Grassholm SPA	Gannet Morus bassanus	None		No allocations are located within 10km of the site. As such, no LSE is anticipated.	
Ramsey and St. David Peninsula Coast SPA	Red-billed chough <i>Pyrrhocorax pyrrhocorax</i> Annex I (breeding)	HSG/119/LDP2/1 HSG/049/LDP2/1 HSG/114/LDP/01		Atmospheric pollution Site is not located within 200m of any roads. No credible risk of LSE is anticipated.  Water Quality The site does not have any water-dependent features. Additionally, the site is not hydrologically connected to any allocations. As such, no LSE is predicted.  Recreation There are 3 e residential allocations located within 7km of the site with a minimum of 97 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, this residential allocation will result in a population increase of 233 . As such, LSE is predicted.  Functionally Linked Land There are no allocations that will result in a direct habitat loss or degradation of the site.	

Designated Site	Designated Factures	Allocations within the	aabalda	Impacts
Designated Site	Designated Features	Allocations within thre	esnoids	
				Disturbance (Noise and Vibration)
				The site is sufficiently distanced from the nearest proposed allocation such that there will be no disturbance via noise or vibration.
				Atmospheric Pollution
				Roads within 200m
		GT/003/LDP2/01		Site is designated for marine habitats and species.
		SSA/089/01		Features not inherently sensitive There are no CLs for these features
		SSA/089/LDP2/01		No credible risk of LSE
		EMP/132/LDP2/01		
		EMP/000/LDP2/01		Water Quality
		EMP/088/LDP/01		There are several allocations, residential, community, and employment located within 10km of the site and are hydrologically connected. As such, construction
Carmarthen Bay		EMP/088/LDP/01		contaminants and amenity management including fertilizer may reduce the quality of
SPA.	Common Scoter <i>Melanitta nigra</i> (wintering)	HSG/132/LDP2/1		water in the tributaries entering Carmarthen Bay. As such, LSE is predicted.
		HSG/047/LDP2/1		Recreation
		HSG/050/LDP2/1		There are six residential allocations located within 7km of the site with a minimum of 118 units. According to the Office for National Statistics, the average household
		HSG/099/LDP2/1 HSG/123/LDP/01		population is 2.4 individuals. As such, these residential allocations will result in a
		HSG/003/LDP2/1		population increase of 283. As such, LSE is predicted.
		113G/003/LDF 2/1		Habitat Loss
				As the site features are marine, no LSE is predicted.
				Disturbance (Noise and Visual)
				As the sites are marine and the allocations within 10km are terrestrial based, no LSE is predicted.
		HSG/086/LDP2/1	HSG/095/LDP2/4	Atmospheric Pollution
		HSG/096/LDP2/1	HSG/095/LDP2/5	Within 200m of road
		HSG/095/00144	HSG/052/LDP2/1	Site is adjacent to minor roads,
		HSG/095/LDP2/1	HSG/096/00238	Site features – Red-billed chough – habitats not inherently sensitive to air
		HSG/046/LDP2/1	HSG/086/00222	pollutants.
		HSG/096/LDP2/2	HSG/052/00011	Existing air quality is below CL.  No credible risk of LSE
		HSG/086/LDP2/2 S/HSG/086/LDP2/3	HSG/048/00038	No credible risk of ESE
		HSG/086/LDP2/4	SPV/066/LDP2/01	Water Quality
		HSG/086/LDP2/5	MXU/095/LDP2/01 EMP/093/00001	The site is not hydrologically connected to any allocations. As such, no LSE is
Castlemartin coast	Red-billed chough Pyrrhocorax pyrrhocorax Annex I	HSG/066/LDP2/1	S/EMP/000/00002	predicted.
SPA	(breeding)	HSG/095/LDP2/2	S/EMP/086/LDP/02	Recreation
		HSG/086/LDP2/6	S/EMP/095/00001	There are 17 residential allocations located within 7km of the site with a minimum of
		HSG/135/LDP2/1	S/EMP/096/00004	839 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a
		HSG/086/LDP2/7	S/EMP/096/00005	population increase of 1788. As such, LSE is predicted.
		HSG/093/00066	S/EMP/086/LDP2/01	Habitat Loss
		S/EMP/000/00007	S/EMP/096/00001	As the chough is highly mobile, with males capable of dispersing approximately
		CF/052/LDP2/01	GT/095/LDP2/1	40km (Future Wales), and finding suitable habitat. As such, LSE is not predicted.
		S/EMP/000/00003	GT/095/LDP2/2	Disturbance (Noise and Visual)
		S/EMP/086/00003	S/EMP/086/LDP/01	There are no allocations inside the site boundary. As such, no LSE is predicted.
		S/EMP/096/00002	EMP/146/00001	

### Part 5

Designated Site	Designated Features	Allocations within thre	sholds	Impacts
		S/EMP/096/00007	HSG/096/LDP2/3	
		S/EMP/096/00006		
		S/EMP/000/00004		
		S/EMP/096/00003		
		S/EMP/086/LDP2/01		
		CF/086/LDP2/1		

# 10. Appendix D Recreation – Housing Allocations within 7km

### Afonydd Cleddau / Cleddau Rivers

						Housing_Component_Typ		
SAC_name	Site_Name	Settlement	Minimum_U	Household (x 2.4)	Units_Beyo	е	LDP2_Reference	distance kr
Afonydd Cleddau / Cleddau Rivers	Land at Ford Farm	Wolfscastle	14	34	0	Residential Allocation	HSG/149/LDP2/1	0.09
Afonydd Cleddau / Cleddau Rivers	Slade Lane	Haverfordwes	330	792	680	Strategic Allocation	S/HSG/040/LDP2/6	0.23
Afonydd Cleddau / Cleddau Rivers	Land at Dungleddy Court	Clarbeston Ro	19	46	0	Residential Allocation	HSG/022/LDP2/1	0.30
Afonydd Cleddau / Cleddau Rivers	Former Education Centre, D	Haverfordwes	22	53	0	Residential Allocation	HSG/040/LDP2/1	0.37
Afonydd Cleddau / Cleddau Rivers	Opposite Woodholm Close	Crundale	15	36	0	Residential Allocation	HSG/029/00014	0.56
Afonydd Cleddau / Cleddau Rivers	South of Robeston Court	Robeston Wat	5	12	0	Residential Allocation	HSG/113/LDP2/01	0.64
Afonydd Cleddau / Cleddau Rivers	Between Cornerways and Au	Simpson Cros	18	43	0	Residential Allocation	HSG/119/LDP2/1	0.68
Afonydd Cleddau / Cleddau Rivers	Adjacent to Maesybryn	Llandissilio	26	62	17	Residential Allocation	HSG/060/LDP2/1	0.75
Afonydd Cleddau / Cleddau Rivers	North West of Wesley Way	Spittal	10	24	10	Residential Allocation	HSG/120/00018	0.76
Afonydd Cleddau / Cleddau Rivers	West of Bloomfield Gardens	Narberth	89	214	64	Residential Allocation	HSG/088/LDP2/1	0.78
Afonydd Cleddau / Cleddau Rivers	West of Globe Inn	Maenclochog	15	36	21	Residential Allocation	HSG/081/LDP2/1	0.82
Afonydd Cleddau / Cleddau Rivers	West of Ashford Park	Crundale	22	53	18	Residential Allocation	HSG/029/LDP2/1	0.86
Afonydd Cleddau / Cleddau Rivers	East of Brookfield Close	Keeston	27	65	0	Residential Allocation	HSG/049/LDP2/1	0.99
Afonydd Cleddau / Cleddau Rivers	East of Pilgrim's Way	Roch	52	125	0	Residential Allocation	HSG/114/LDP/01	1.00
Afonydd Cleddau / Cleddau Rivers	Rear of 76 Pembroke Road	Merlins Bridge	51	122	0	Residential Allocation	HSG/040/LDP2/3	1.47
Afonydd Cleddau / Cleddau Rivers	South of Bro'r Dderwen	Clunderwen	31	74	31	Residential Allocation	HSG/152/LDP2/1	1.58
Afonydd Cleddau / Cleddau Rivers	Maesgwynne	Fishguard	175	420	167	Strategic Allocation	S/HSG/034F/LDP2/1	1.81
Afonydd Cleddau / Cleddau Rivers	Between Longstone Court ar	Letterston	38	91	0	Residential Allocation	HSG/053/LDP2/1	1.95
Afonydd Cleddau / Cleddau Rivers	East of Waunaeron	Crymych	28	67	0	Residential Allocation	HSG/030/LDP/01	2.48
Afonydd Cleddau / Cleddau Rivers	West of Kings Park Farm	Templeton	14	34	0	Residential Allocation	HSG/132/LDP2/1	2.66
Afonydd Cleddau / Cleddau Rivers	Maes yr Ysgol	Johnston	13	31	0	Residential Allocation	HSG/048/LDP2/1	5.10
Afonydd Cleddau / Cleddau Rivers	Adjacent to Hafod	Blaenffos	6	14	9	Residential Allocation	HSG/006/00003	5.47
Afonydd Cleddau / Cleddau Rivers	North of Hayston View	Johnston	50	120	42	Residential Allocation	HSG/048/00038	5.65
Afonydd Cleddau / Cleddau Rivers	North of The Kilns	Llangwm	66	158	0	Residential Allocation	HSG/063/00024	6.02
Afonydd Cleddau / Cleddau Rivers	North of Begelly Farm	Begelly	46	110	0	Residential Allocation	HSG/003/LDP2/1	6.50
Afonydd Cleddau / Cleddau Rivers	North of Bulford Road Bypas	Tiers Cross	6	14	0	Residential Allocation	HSG/135/LDP2/1	6.89
Totals (26 sites)			1188	2851				

#### Afon Teifi SAC

Afon Teifi / River		Settleme	Minimum_Units_In_Pl	Households	Units_Beyond_The_Pl	Housing_Compone	LDP2_Refer	distance
Teifi SAC	Site_Name	nt	an_Period	(2.4)	an_Period	nt_Type	ence	km
Afon Teifi / River	Land at Tan	Cilgerra				Residential	HSG/020/L	
Teifi	Ffynnon Fields	n	50	120	40	Allocation	DP2/1	0.16
		St						
Afon Teifi / River	Awel y Mor	Dogmael				Residential	HSG/122/0	
Teifi	extension	S	28	67	0	Allocation	0035	0.22
Afon Teifi / River		Blaenffo				Residential	HSG/006/0	
Teifi	Adjacent to Hafod	S	6	14	9	Allocation	0003	4.19
Afon Teifi / River						Residential	HSG/030/L	
Teifi	East of Waunaeron	Crymych	28	67	0	Allocation	DP/01	6.54
Totals(4 sites)			112	269				

### Bristol Channel SAC

Bristol Channel Approaches /		Settlem	Minimum_Units_I	Househo	Units_Beyond_Th	Housing_Com	LDP2_Ref	distan
Dynesfeydd Môr Hafren SAC	Site_Name	ent	n_Plan_Period	lds(2.4)	e_Plan_Period	ponent_Type	erence	ce km

Bristol Channel Approaches /						Residential	HSG/050	
Dynesfeydd Môr Hafren	South of Rock Park	Kilgetty	19	46	0	Allocation	/LDP2/1	2.04
Bristol Channel Approaches /		Lamphe				Residential	HSG/052	
Dynesfeydd Môr Hafren	South of Cleggars Park	у	55	132	0	Allocation	/00011	2.04
Bristol Channel Approaches /	Adjacent to Lamphey	Lamphe				Residential	HSG/052	
Dynesfeydd Môr Hafren	School	у	40	96	0	Allocation	/LDP2/1	2.19
Bristol Channel Approaches /		Pentlepo				Residential	HSG/099	
Dynesfeydd Môr Hafren	Land at Coppins Park	ir	11	26	0	Allocation	/LDP2/1	2.52
Bristol Channel Approaches /		St				Residential	HSG/123	
Dynesfeydd Môr Hafren	North of Parsons Green	Florence	20	48	0	Allocation	/LDP/01	3.20
Bristol Channel Approaches /						Residential	HSG/003	
Dynesfeydd Môr Hafren	North of Begelly Farm	Begelly	46	110	0	Allocation	/LDP2/1	3.27
Bristol Channel Approaches /		Pembrok				Residential	HSG/095	
Dynesfeydd Môr Hafren	North of Gibbas Way	е	43	103	43	Allocation	/00144	3.99
	South East of							
Bristol Channel Approaches /	Southlands St.Daniels	Pembrok				Residential	HSG/095	
Dynesfeydd Môr Hafren	Hill	е	26	62	0	Allocation	/LDP2/5	4.49
	South West of							
Bristol Channel Approaches /	Southlands, St. Daniels	Pembrok				Residential	HSG/095	
Dynesfeydd Môr Hafren	Hill	е	19	46	0	Allocation	/LDP2/2	4.58
Bristol Channel Approaches /	Between St Daniels Hill	Pembrok				Residential	HSG/095	
Dynesfeydd Môr Hafren	& Norgans Hill	е	147	353	0	Allocation	/LDP2/1	4.67
Bristol Channel Approaches /	East of Golden Hill	Pembrok				Residential	HSG/095	
Dynesfeydd Môr Hafren	Road	е	50	120	0	Allocation	/LDP2/4	5.23
Bristol Channel Approaches /		Jeffreyst				Residential	HSG/047	
Dynesfeydd Môr Hafren	South of The Crown	on	8	19	0	Allocation	/LDP2/1	5.59
Bristol Channel Approaches /	Land at West End	Hundlet				Residential	HSG/046	
Dynesfeydd Môr Hafren	Cottages	on	14	34	0	Allocation	/LDP2/1	6.53
Bristol Channel Approaches /	West of Kings Park	Templet				Residential	HSG/132	
Dynesfeydd Môr Hafren	Farm	on	14	34	0	Allocation	/LDP2/1	6.54
Bristol Channel Approaches /	North of Pembroke	Pembrok				Residential	HSG/096	
Dynesfeydd Môr Hafren	Road	e Dock	38	91	0	Allocation	/00238	6.82
Totals (15 sites)			550	1320				

West Wales Marine SAC

West Wales Marine /		Settleme	Minimum_Units_In	Househol	Units_Beyond_The	Housing_Comp	LDP2_Refer	distan	
Gorllewin Cymru Forol SAC	Site_Name	nt	_Plan_Period	ds(x2.4)	_Plan_Period	onent_Type	ence	ce km	

West Wales Marine /		Fishguar				Strategic	S/HSG/034	
Gorllewin Cymru Forol	Maesgwynne	d	175	420	167	Allocation	F/LDP2/1	0.86
West Wales Marine /						Residential	HSG/114/L	
Gorllewin Cymru Forol	East of Pilgrim's Way	Roch	52	125	0	Allocation	DP/01	2.31
		St						
West Wales Marine /		Dogmael				Residential	HSG/122/0	
Gorllewin Cymru Forol	Awel y Mor extension	S	28	67	0	Allocation	0035	3.50
West Wales Marine /	Between Cornerways	Simpson				Residential	HSG/119/L	
Gorllewin Cymru Forol	and Austalise	Cross	18	43	0	Allocation	DP2/1	3.72
West Wales Marine /	Former Hakin Infants'	Milford				Residential	HSG/086/L	
Gorllewin Cymru Forol	School	Haven	14	34	0	Allocation	DP2/4	4.31
West Wales Marine /	East of Brookfield					Residential	HSG/049/L	
Gorllewin Cymru Forol	Close	Keeston	27	65	0	Allocation	DP2/1	4.55
West Wales Marine /	Former Hubberston	Milford				Residential	HSG/086/L	
Gorllewin Cymru Forol	VC School, Hakin	Haven	26	62	0	Allocation	DP2/5	4.62
West Wales Marine /	Former Hakin Junior	Milford				Residential	HSG/086/L	
Gorllewin Cymru Forol	School	Haven	43	103	0	Allocation	DP2/6	4.63
West Wales Marine /	South West of The	Milford				Residential	HSG/086/0	
Gorllewin Cymru Forol	Meads	Haven	93	223	0	Allocation	0222	5.53
West Wales Marine /	North of Bulford Road	Tiers				Residential	HSG/135/L	
Gorllewin Cymru Forol	Bypass	Cross	6	14	0	Allocation	DP2/1	5.62
Totals (10 sites)			482	1157				

### Carmarthen Bay SAC

		Settle	Minimum_Units_In	Househol	Units_Beyond_The	Housing_Comp	LDP2_Ref	distanc
SAC_name	Site_Name	ment	_Plan_Period	ds(2.4)	_Plan_Period	onent_Type	erence	e km
Carmarthen Bay and Estuaries / Bae	North of	Begell				Residential	HSG/003/	
Caerfyrddin ac Aberoedd	Begelly Farm	у	46	110	0	Allocation	LDP2/1	3.02
Carmarthen Bay and Estuaries / Bae	South of The	Jeffrey				Residential	HSG/047/	
Caerfyrddin ac Aberoedd	Crown	ston	8	19	0	Allocation	LDP2/1	5.26
Carmarthen Bay and Estuaries / Bae	South of Rock	Kilgett				Residential	HSG/050/	
Caerfyrddin ac Aberoedd	Park	у	19	46	0	Allocation	LDP2/1	1.75
Carmarthen Bay and Estuaries / Bae	Land at	Pentle				Residential	HSG/099/	
Caerfyrddin ac Aberoedd	Coppins Park	poir	11	26	0	Allocation	LDP2/1	2.19
		St						
Carmarthen Bay and Estuaries / Bae	North of	Floren				Residential	HSG/123/	
Caerfyrddin ac Aberoedd	Parsons Green	ce	20	48	0	Allocation	LDP/01	4.99
Carmarthen Bay and Estuaries / Bae	West of Kings	Templ				Residential	HSG/132/	
Caerfyrddin ac Aberoedd	Park Farm	eton	14	34	0	Allocation	LDP2/1	6.26
Totals(6 sites)			118	283				

Pembrokeshire Marine SAC

SAC_name	Sire_Name	Settlement	Minimum_l	Household	Units_Beyo	Housing_C	LDP2_Reference	distance kr
Pembrokeshire Marine / Sir Benfro Forol	East of Hazelbank	Llanstadwe	10	24	0	Residentia	HSG/066/LDP2/1	0.05
Pembrokeshire Marine / Sir Benfro Forol	Former Hakin Infants' School	Milford Hav	14	34	0	Residentia	HSG/086/LDP2/4	0.17
Pembrokeshire Marine / Sir Benfro Forol	West of Stranraer Road	Pembroke	59	142	0	Residentia	HSG/096/LDP2/2	0.18
Pembrokeshire Marine / Sir Benfro Forol	Former Hakin Junior School	Milford Hav	43	103	0	Residentia	HSG/086/LDP2/6	0.25
Pembrokeshire Marine / Sir Benfro Forol	East of Poppy Drive	Neyland	101	242	0	Residentia	HSG/093/00066	0.25
Pembrokeshire Marine / Sir Benfro Forol	Land at Hampshire Drive	Pembroke	33	79	0	Residentia	HSG/096/LDP2/1	0.33
Pembrokeshire Marine / Sir Benfro Forol	Former Hubberston VC School, Hakin	Milford Hav	26	62	0	Residentia	HSG/086/LDP2/5	0.38
Pembrokeshire Marine / Sir Benfro Forol	North of The Kilns	Llangwm	66	158	0	Residentia	HSG/063/00024	0.56
Pembrokeshire Marine / Sir Benfro Forol	North of Pembroke Road	Pembroke	38	91	0	Residentia	HSG/096/00238	0.58
Pembrokeshire Marine / Sir Benfro Forol	Former Education Centre, Dew Street	Haverfordy	22	53	0	Residentia	HSG/040/LDP2/1	0.67
Pembrokeshire Marine / Sir Benfro Forol	South West of The Meads	Milford Hav	93	223	0	Residentia	HSG/086/00222	0.70
Pembrokeshire Marine / Sir Benfro Forol	East of Golden Hill Road	Pembroke	50	120	0	Residentia	HSG/095/LDP2/4	0.71
Pembrokeshire Marine / Sir Benfro Forol	Between St Daniels Hill & Norgans Hill	Pembroke	147	353	0	Residentia	HSG/095/LDP2/1	0.82
Pembrokeshire Marine / Sir Benfro Forol	Land at West End Cottages	Hundleton	14	34	0	Residentia	HSG/046/LDP2/1	0.90
Pembrokeshire Marine / Sir Benfro Forol	South West of Southlands, St. Daniels Hill	Pembroke	19	46	0	Residentia	HSG/095/LDP2/2	1.08
Pembrokeshire Marine / Sir Benfro Forol	Slade Lane	Haverfordy	330	792	680	Strategic A	S/HSG/040/LDP2/6	1.11
Pembrokeshire Marine / Sir Benfro Forol	South East of Southlands St. Daniels Hill	Pembroke	26	62	0	Residentia	HSG/095/LDP2/5	1.13
Pembrokeshire Marine / Sir Benfro Forol	Rear of 76 Pembroke Road	Merlins Bri	51	122	0	Residentia	HSG/040/LDP2/3	1.29
Pembrokeshire Marine / Sir Benfro Forol	Land at Myrtle Meadows, Steynton	Milford Hav	60	144	0	Residentia	HSG/086/LDP2/1	1.49
Pembrokeshire Marine / Sir Benfro Forol	Adjacent to Brackenhurst	Hill Mounta	15	36	11	Residentia	HSG/043/LDP2/1	1.59
Pembrokeshire Marine / Sir Benfro Forol	North of Gibbas Way	Pembroke	43	103	43	Residentia	HSG/095/00144	1.73
Pembrokeshire Marine / Sir Benfro Forol	South of Cleggars Park	Lamphey	55	132	0	Residentia	HSG/052/00011	1.84
Pembrokeshire Marine / Sir Benfro Forol	South of Conway Drive, Castle Pill Road, Steynton	Milford Hav	117	281	163	Strategic A	S/HSG/086/LDP2/3	1.84
Pembrokeshire Marine / Sir Benfro Forol	Adjacent to Lamphey School	Lamphey	40	96	0	Residentia	HSG/052/LDP2/1	1.98
Pembrokeshire Marine / Sir Benfro Forol	East of Castle Pill Road Steynton	Milford Hav	23	55	0	Residentia	HSG/086/LDP2/2	2.02
Pembrokeshire Marine / Sir Benfro Forol	East of Pilgrim's Way	Roch	52	125	0	Residentia	HSG/114/LDP/01	2.15
Pembrokeshire Marine / Sir Benfro Forol	North East of Beaconing, Steynton	Milford Hav	14	34	0	Residentia	HSG/086/LDP2/7	2.43
Pembrokeshire Marine / Sir Benfro Forol	Opposite Woodholm Close	Crundale	15	36	0	Residentia	HSG/029/00014	2.62
Pembrokeshire Marine / Sir Benfro Forol	South of Robeston Court	Robeston V	5	12	0	Residentia	HSG/113/LDP2/01	2.72
Pembrokeshire Marine / Sir Benfro Forol	West of Ashford Park	Crundale	22	53	18	Residentia	HSG/029/LDP2/1	2.96
Pembrokeshire Marine / Sir Benfro Forol	Maes yr Ysgol	Johnston	13	31	0	Residentia	HSG/048/LDP2/1	3.27
Pembrokeshire Marine / Sir Benfro Forol	Between Cornerways and Austalise	Simpson C	18	43	0	Residentia	HSG/119/LDP2/1	3.44
Pembrokeshire Marine / Sir Benfro Forol	South of The Crown	Jeffreyston	8	19	0	Residentia	HSG/047/LDP2/1	3.58
Pembrokeshire Marine / Sir Benfro Forol	North of Parsons Green	St Florence	20	48	0	Residentia	HSG/123/LDP/01	3.65
Pembrokeshire Marine / Sir Benfro Forol	North of Hayston View	Johnston	50	120	42	Residentia	HSG/048/00038	3.81
Pembrokeshire Marine / Sir Benfro Forol	North of Bulford Road Bypass	Tiers Cross	6	14	0	Residentia	HSG/135/LDP2/1	4.12
Pembrokeshire Marine / Sir Benfro Forol	East of Brookfield Close	Keeston	27	65	0	Residentia	HSG/049/LDP2/1	4.27
Pembrokeshire Marine / Sir Benfro Forol	West of Bloomfield Gardens and North of Adams Drive & Highfield Par	Narberth	89	214	64	Residentia	HSG/088/LDP2/1	4.45
Pembrokeshire Marine / Sir Benfro Forol	West of Kings Park Farm	Templeton	14	34	0	Residentia	HSG/132/LDP2/1	5.83
Pembrokeshire Marine / Sir Benfro Forol	Land at Coppins Park	Pentlepoir	11	26	0	Residentia	HSG/099/LDP2/1	6.63
Pembrokeshire Marine / Sir Benfro Forol	North of Begelly Farm	Begelly	46	110			HSG/003/LDP2/1	6.65
Pembrokeshire Marine / Sir Benfro Forol	Land at Dungleddy Court	Clarbestor	19	46			HSG/022/LDP2/1	6.84
Pembrokeshire Marine / Sir Benfro Forol	Land south of Sycamore Woods and west of Lavinia Drive	Pembroke	9	22	0	Residentia	HSG/096/LDP2/3	0.24
Totals(43 sites)			1933	4639				

# Cardigan Bay SAC

Cardigan Bay / Bae		Settlem	Minimum_Units_In_P	Households	Units_Beyond_The_Pl	Housing_Compon	LDP2_Refer	distanc
Ceredigion SAC	Site_Name	ent	lan_Period	(x2.4)	an_Period	ent_Type	ence	e km
		St						
Cardigan Bay / Bae	Awel y Mor	Dogmae				Residential	HSG/122/0	
Ceredigion	extension	ls	28	67	0	Allocation	0035	2.83
Cardigan Bay / Bae	Land at Tan	Cilgerra				Residential	HSG/020/L	
Ceredigion	Ffynnon Fields	n	50	120	40	Allocation	DP2/1	6.52
Totals(2 sites)			78	187				

## Gweunydd Blaencleddau SAC

		Settleme	Minimum_Units_In_Pla	Households(	Units_Beyond_The_Pla	Housing_Compone	LDP2_Refer	distance
SAC_name	Site_Name	nt	n_Period	x2.4)	n_Period	nt_Type	ence	km

Gweunydd	East of					Residential	HSG/030/LD	
Blaencleddau	Waunaeron	Crymych	28	67	0	Allocation	P/01	1.80
Gweunydd	Adjacent to					Residential	HSG/006/00	
Blaencleddau	Hafod	Blaenffos	6	14	9	Allocation	003	4.57
Gweunydd	West of	Maencloc				Residential	HSG/081/LD	
Blaencleddau	Globe Inn	hog	15	36	21	Allocation	P2/1	6.95
Totals(3 sites)			49	118				

Limestone Coast SAC

		Minimum_Units
	Settlem	_In_Plan_Perio
Site_Name	ent	d
	Site_Name	

;	Househ	Units_Beyond_	Housing_Co		dista
	olds(x2.	Units_Beyond_ The_Plan_Perio	mponent_Ty	LDP2_Ref	nce
	4)	d	pe	erence	km
	-				

Limestone Coast of South West Wales	1	St			]		1	I I
/ Arfordir Calchfaen De Orllewin		Florenc				Residential	HSG/123	
Cymru	North of Parsons Green	е	20	48	0	Allocation	/LDP/01	3.05
Limestone Coast of South West Wales							1	
/ Arfordir Calchfaen De Orllewin		Lamph				Residential	HSG/052	
Cymru	South of Cleggars Park	еу	55	132	0		/00011	4.34
Limestone Coast of South West Wales		,						
/ Arfordir Calchfaen De Orllewin	Former Hakin Infants'	Milford				Residential	HSG/086	
Cymru	School	Haven	14	34	0	Allocation	/LDP2/4	4.52
Limestone Coast of South West Wales								
/ Arfordir Calchfaen De Orllewin		Milford				Residential	HSG/086	
Cymru	Former Hakin Junior School	Haven	43	103	0		/LDP2/6	4.56
Limestone Coast of South West Wales								
/ Arfordir Calchfaen De Orllewin	Adjacent to Lamphey	Lamph				Residential	HSG/052	
Cymru	School	ey	40	96	0	Allocation	/LDP2/1	4.67
Limestone Coast of South West Wales		,						
/ Arfordir Calchfaen De Orllewin	South East of Southlands	Pembro				Residential	HSG/095	
Cymru	St.Daniels Hill	ke	26	62	0	Allocation	/LDP2/5	4.68
Limestone Coast of South West Wales		1.0					1	
/ Arfordir Calchfaen De Orllewin	Former Hubberston VC	Milford				Residential	HSG/086	
Cymru	School, Hakin	Haven	26	62	0	Allocation	/LDP2/5	4.70
Limestone Coast of South West Wales	Concest Halan	1107011	20			7 KKOGGKION	7231270	11.70
/ Arfordir Calchfaen De Orllewin	South West of Southlands,	Pembro				Residential	HSG/095	
Cymru	St. Daniels Hill	ke	19	46	0	Allocation	/LDP2/2	4.71
Limestone Coast of South West Wales	G. Barneto i iik	i i i	10	-10		7 KKOGGKION	7231272	7., 2
/ Arfordir Calchfaen De Orllewin	Between St Daniels Hill &	Pembro				Residential	HSG/095	
Cymru	Norgans Hill	ke	147	353	0		/LDP2/1	4.76
Limestone Coast of South West Wales	- Norgano Filit	i i i	1-17			7 KKOGGKION	7231271	4., 0
/ Arfordir Calchfaen De Orllewin		Pembro				Residential	HSG/095	
Cymru	North of Gibbas Way	ke	43	103	43	Allocation	/00144	5.21
Limestone Coast of South West Wales	- North of Classes Way	i i i	10	100	-10	7 KKOGGKION	7002-1-1	0.21
/ Arfordir Calchfaen De Orllewin		Milford				Residential	HSG/086	
Cymru	South West of The Meads	Haven	93	223	0	Allocation	/00222	5.33
Limestone Coast of South West Wales	Court West of The Fleuds	Pembro				7 KKOGGKION	700222	0.00
/ Arfordir Calchfaen De Orllewin		ke				Residential	HSG/096	
Cymru	West of Stranraer Road	Dock	59	142	0		/LDP2/2	5.49
Limestone Coast of South West Wales	Troot of Giram act Hoda	Doon				711100011011	7221272	01.10
/ Arfordir Calchfaen De Orllewin		Hundle				Residential	HSG/046	
Cymru	Land at West End Cottages	ton	14	34	0	Allocation	/LDP2/1	5.56
Limestone Coast of South West Wales	Zarra at 1100t Zira Oottagoo	1011				711100011011	7231272	0.00
/ Arfordir Calchfaen De Orllewin		Pembro				Residential	HSG/095	
Cymru	East of Golden Hill Road	ke	50	120	0		/LDP2/4	5.96
Limestone Coast of South West Wales	2401010014011111111044					711100011011	7231271	0.00
/ Arfordir Calchfaen De Orllewin	Land at Myrtle Meadows,	Milford				Residential	HSG/086	
Cymru	Steynton	Haven	60	144	0		/LDP2/1	6.13
Limestone Coast of South West Wales	Ctoymon	1101011				, modulon	7231272	0.10
/ Arfordir Calchfaen De Orllewin		Llansta				Residential	HSG/066	
Cymru	East of Hazelbank	dwell	10	24	0	Allocation	/LDP2/1	6.46
Limestone Coast of South West Wales						7 1110 0 01 11 0 11	S/HSG/0	01.10
/ Arfordir Calchfaen De Orllewin	South of Conway Drive,	Milford				Strategic	86/LDP2/	
Cymru	Castle Pill Road, Steynton	Haven	117	281	163	Allocation	3	6.47
Limestone Coast of South West Wales							-	
/ Arfordir Calchfaen De Orllewin	East of Castle Pill Road	Milford				Residential	HSG/086	
Cymru	Steynton	Haven	23	55	0	Allocation	/LDP2/2	6.66
Limestone Coast of South West Wales	,							2.33
/ Arfordir Calchfaen De Orllewin		Pentlep				Residential	HSG/099	
Cymru	Land at Coppins Park	oir	11	26	0	Allocation	/LDP2/1	6.86
Limestone Coast of South West Wales	Land south of Sycamore	Pembro			J			5.55
/ Arfordir Calchfaen De Orllewin	Woods and west of Lavinia	ke				Residential	HSG/096	
Cymru	Drive	Dock	9	22	0		/LDP2/3	6.68
Totals(20 sites)	1111		879	2110	j			2.00
101410(20 01100)		1	0/3	2110		<u> </u>	1	

North Pembrokeshire Woodlands SAC

		Settle	Minimum_Units_	Househol	Units_Beyond_T	Housing_Com	LDP2_Refe	distan	
SAC_name	Site_Name	ment	In_Plan_Period	ds(x2.4)	he_Plan_Period	ponent_Type	rence	ce km	

North Pembrokeshire Woodlands		Fishg				Strategic	S/HSG/03	
/ Coedydd Gogledd Sir Benfro	Maesgwynne	uard	175	420	167	Allocation	4F/LDP2/1	4.35
North Pembrokeshire Woodlands		Blaen				Residential	HSG/006/0	
/ Coedydd Gogledd Sir Benfro	Adjacent to Hafod	ffos	6	14	9	Allocation	0003	5.80
North Pembrokeshire Woodlands	Between Longstone Court	Letter				Residential	HSG/053/L	
/ Coedydd Gogledd Sir Benfro	and 62, St. Davids Road	ston	38	91	0	Allocation	DP2/1	6.74
North Pembrokeshire Woodlands		Cilger				Residential	HSG/020/L	
/ Coedydd Gogledd Sir Benfro	Land at Tan Ffynnon Fields	ran	50	120	40	Allocation	DP2/1	6.76
Totals(4 sites)			269	646				

<sup>`</sup>Northwest Pembrokeshire Commons SAC

Designated Site	Allocation	Number of units	Population Increase
Northwest Pembrokeshire Commons SAC	N/A	N/A	N/A
TOTAL			

#### Preseli SAC

SAC_			Minimum_Units_In_	Households	Units_Beyond_The_			
name	Site_Name	Settlement	Plan_Period	(x2.4)	Plan_Period	Allocation	LDP2_Reference	distance km
						Residential		
Preseli	East of Waunaeron	Crymych	28	67	0	Allocation	HSG/030/LDP/01	1.85
						Residential		
Preseli	Adjacent to Hafod	Blaenffos	6	14	9	Allocation	HSG/006/00003	3.89
						Residential		
Preseli	West of Globe Inn	Maenclochog	15	36	21	Allocation	HSG/081/LDP2/1	4.41
	Between Longstone							
	Court and 62, St.					Residential		
Preseli	Davids Road	Letterston	38	91	0	Allocation	HSG/053/LDP2/1	6.31
						Residential		
Preseli	Land at Ford Farm	Wolfscastle	14	34	0	Allocation	HSG/149/LDP2/1	6.94
Totals(5 sites)			101	242				

#### St David's SAC

		Settlemen	Minimum_Units_In_P	Households	Units_Beyond_The_Pl	Housing_Compon	LDP2_Refere	distanc
SAC_name	Site_Name	t	lan_Period	(x2.4)	an_Period	ent_Type	nce	e km
St David's / Ty						Residential	HSG/114/LDP	
Ddewi	East of Pilgrim's Way	Roch	52	125	0	Allocation	/01	3.45
St David's / Ty						Strategic	S/HSG/034F/	
Ddewi	Maesgwynne	Fishguard	175	420	167	Allocation	LDP2/1	5.49
St David's / Ty	Between Cornerways	Simpson				Residential	HSG/119/LDP	
Ddewi	and Austalise	Cross	18	43	0	Allocation	2/1	6.20
St David's / Ty						Residential	HSG/049/LDP	
Ddewi	East of Brookfield Close	Keeston	27	65	0	Allocation	2/1	6.85
Totals(4								
sites)			272	653				

Yerbeston Tops SAC

SAC_na			Minimum_Units_In_Pl	Households	Units_Beyond_The_Pl	Housing_Compon	LDP2_Refere	distanc	
me	Site_Name	Settlement	an_Period	(x2.4)	an_Period	ent_Type	nce	e km	

Yerbest						Residential	HSG/047/LD	
on Tops	South of The Crown	Jeffreyston	8	19	0	Allocation	P2/1	3.95
Yerbest						Residential	HSG/132/LD	
on Tops	West of Kings Park Farm	Templeton	14	34	0	Allocation	P2/1	5.16
Yerbest		Robeston				Residential	HSG/113/LD	
on Tops	South of Robeston Court	Wathen	5	12	0	Allocation	P2/01	5.98
Yerbest						Residential	HSG/003/LD	
on Tops	North of Begelly Farm	Begelly	46	110	0	Allocation	P2/1	5.99
Yerbest						Residential	HSG/063/00	
on Tops	North of The Kilns	Llangwm	66	158	0	Allocation	024	6.47
	West of Bloomfield							
	Gardens and North of							
Yerbest	Adams Drive & Highfield					Residential	HSG/088/LD	
on Tops	Park	Narberth	89	214	64	Allocation	P2/1	6.56
Yerbest						Residential	HSG/099/LD	
on Tops	Land at Coppins Park	Pentlepoir	11	26	0	Allocation	P2/1	6.77
Totals(7								
sites)			239	574				

Pembrokeshire Bat Sites and Bosherston Lakes SAC

		LDP2_R		Minimum_Unit	Househ
		eferenc	Settle	s_In_Plan_Peri	olds(x2.
SAC_name	Site_Name	е	ment	od	4)

Units_Beyond	Housing_Co	dista
_The_Plan_Per	mponent_Ty	nce
iod	ре	km

Pembrokeshire Bat Sites and Bosherton Lakes	1	HSG/04		1			1	I
/ Safleoedd Ystlum Sir Benfro a Llynnoedd	Land at West End	6/LDP2/	Hund				Residential	
Bosherton	Cottages	1	leton	14	34	0	Allocation	1.43
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/09						
/ Safleoedd Ystlum Sir Benfro a Llynnoedd	Between St Daniels Hill &	5/LDP2/	Pemb			_	Residential	
Bosherton	Norgans Hill	1	roke	147	353	0	Allocation	3.07
Pembrokeshire Bat Sites and Bosherton Lakes	0	HSG/09	D I-				Danidantial	
/ Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton	South West of Southlands, St. Daniels Hill	5/LDP2/ 2	Pemb roke	19	46	0	Residential Allocation	3.32
Pembrokeshire Bat Sites and Bosherton Lakes	St. Daniets fill	HSG/09	Toke	19	46	U	Allocation	3.32
/ Safleoedd Ystlum Sir Benfro a Llynnoedd	South East of Southlands	5/LDP2/	Pemb				Residential	
Bosherton	St.Daniels Hill	5	roke	26	62	0	Allocation	3.36
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/09	Pemb					
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		6/LDP2/	roke				Residential	
Bosherton	West of Stranraer Road	2	Dock	59	142	0	Allocation	3.45
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/09						
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		9/LDP2/	Pentl				Residential	
Bosherton	Land at Coppins Park	1	epoir	11	26	0	Allocation	3.90
Pembrokeshire Bat Sites and Bosherton Lakes			Pemb					
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		HSG/09	roke			-	Residential	
Bosherton	North of Pembroke Road	6/00238	Dock	38	91	0	Allocation	4.09
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/12	St					
/ Safleoedd Ystlum Sir Benfro a Llynnoedd	Nauth of Davasus Overs	3/LDP/0	Flore	00	40	0	Residential	4.00
Bosherton  Pembrokeshire Bat Sites and Bosherton Lakes	North of Parsons Green	1 HSG/05	nce	20	48	0	Allocation	4.09
/ Safleoedd Ystlum Sir Benfro a Llynnoedd	Adjacent to Lamphey	2/LDP2/	Lamp				Residential	
Bosherton	School	1	hey	40	96	0	Allocation	4.19
Pembrokeshire Bat Sites and Bosherton Lakes	3011000	HSG/09	псу	40	30	0	Attocation	4.13
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		5/LDP2/	Pemb				Residential	
Bosherton	East of Golden Hill Road	4	roke	50	120	0	Allocation	4.41
Pembrokeshire Bat Sites and Bosherton Lakes	240101001401111111111111111111111111111		10110		120		711100011011	
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		HSG/05	Lamp				Residential	
Bosherton	South of Cleggars Park	2/00011	hey	55	132	0	Allocation	4.50
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/04						
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		7/LDP2/	Jeffre				Residential	
Bosherton	South of The Crown	1	yston	8	19	0	Allocation	4.74
Pembrokeshire Bat Sites and Bosherton Lakes								
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		HSG/09	Pemb				Residential	
Bosherton	North of Gibbas Way	5/00144	roke	43	103	43	Allocation	4.80
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/05						
/ Safleoedd Ystlum Sir Benfro a Llynnoedd	0 11 (D 1 D 1	0/LDP2/	Kilget	40	40		Residential	F 00
Bosherton Bosherton	South of Rock Park	1	ty	19	46	0	Allocation	5.00
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/09	Pemb				Decidential	
/ Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton	Land at Hampshire Drive	6/LDP2/	roke Dock	33	79	0	Residential Allocation	5.19
Bosnerton	Land at Hampshire Drive	1	Robe	33	79	0	Allocation	5.19
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/11	ston					
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		3/LDP2/	Wath				Residential	
Bosherton	South of Robeston Court	01	en	5	12	0	Allocation	5.53
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/00						
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		3/LDP2/	Begel				Residential	
Bosherton	North of Begelly Farm	1	ly	46	110	0	Allocation	5.55
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/06	Llans					
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		6/LDP2/	tadw				Residential	
Bosherton	East of Hazelbank	1	ell	10	24	0	Allocation	5.79
Pembrokeshire Bat Sites and Bosherton Lakes								
/ Safleoedd Ystlum Sir Benfro a Llynnoedd		HSG/06	Llang				Residential	
Bosherton	North of The Kilns	3/00024	wm	66	158	0	Allocation	5.87
Pembrokeshire Bat Sites and Bosherton Lakes		1100 15					David at 1	
/ Safleoedd Ystlum Sir Benfro a Llynnoedd	Foot of Dames Dates	HSG/09	Neyla	101	0.10	•	Residential	0.00
Bosherton  Pembrokoshira Pet Sites and Bosherton Lakes	East of Poppy Drive	3/00066	nd	101	242	0	Allocation	6.66
Pembrokeshire Bat Sites and Bosherton Lakes		HSG/02	Clarb				Posidontial	
/ Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton	Land at Dungleddy Court	2/LDP2/	eston Road	19	46	0	Residential Allocation	6.95
Pembrokeshire Bat Sites and Bosherton Lakes	Land at Dungleddy Court  Land south of Sycamore	HSG/09	Pemb	19	40	U	AUGGUUII	0.93
/ Safleoedd Ystlum Sir Benfro a Llynnoedd	Woods and west of Lavinia	6/LDP2/	roke				Residential	
Bosherton	Drive	3	Dock	9	22	0		3.5
Totals(22 sites)	2		JOOK	838	2011	<u> </u>	7.00000011	0.0
i otato (ZZ Situs)		İ		030	2011		l	<u> </u>

#### Skomer Skokholm and Seas off Pembrokeshire SPA

Skomer, Skokholm								
and the Seas off			Minimum_Units_In		Units_Beyond_The_			Distance 7
Pembrokeshire SPA	Site_Name	Settlement	_Plan_Period	Households(x2.4)	Plan_Period	Housing_Component_Type	LDP2_Reference	km or less
Skomer, Skokholm and								
the Seas off								
Pembrokeshire	South of Cleggars Park	Lamphey	55	132	0	Residential Allocation	HSG/052/00011	5.0
Skomer, Skokholm and								
the Seas off								
Pembrokeshire	Adjacent to Lamphey School	Lamphey	40	96	0	Residential Allocation	HSG/052/LDP2/1	5.2
Skomer, Skokholm and								
the Seas off								
Pembrokeshire	South East of Southlands St. Dani	Pembroke	26	62.4	0	Residential Allocation	HSG/095/LDP2/5	5.6
Skomer, Skokholm and								
the Seas off								
Pembrokeshire	South West of Southlands, St. Da	Pembroke	19	45.6	0	Residential Allocation	HSG/095/LDP2/2	5.6
Skomer, Skokholm and								
the Seas off								
Pembrokeshire	Between St Daniels Hill & Norgan	Pembroke	147	352.8	0	Residential Allocation	HSG/095/LDP2/1	5.7
Skomer, Skokholm and								
the Seas off								
Pembrokeshire	North of Gibbas Way	Pembroke	43	103.2	43	Residential Allocation	HSG/095/00144	6.2
Skomer, Skokholm and								
the Seas off								
Pembrokeshire	Land at West End Cottages	Hundleton	14	33.6	0	Residential Allocation	HSG/046/LDP2/1	6.3
Skomer, Skokholm and								
the Seas off								
Pembrokeshire	East of Golden Hill Road	Pembroke	50	120	0	Residential Allocation	HSG/095/LDP2/4	6.9
Totals (8 Sites)			394	946	43			

### Ramsey and St. David Peninsula Coast SPA

Ramsey and St								
David's Peninsula			Minimum_Units_In		Units_Beyond_The_			Distance 7
Coast	Site_Name	Settlement	_Plan_Period	Households(x2.4)	Plan_Period	Housing_Component_Type	LDP2_Reference	km or less
Ramsey and St David's								
Peninsula Coast	East of Brookfield Close	Keeston	27	64.8	0	Residential Allocation	HSG/049/LDP2/1	6.9
Ramsey and St David's								
Peninsula Coast	Between Cornerways and Austal	Simpson Cross	18	43.2	0	Residential Allocation	HSG/119/LDP2/1	6.2
Ramsey and St David's								
Peninsula Coast	East of Pilgrim's Way	Roch	52	124.8	0	Residential Allocation	HSG/114/LDP/01	3.4
Totals			97	233				

#### Carmarthen Bay SPA.

			Minimum_Units_In		Units_Beyo			Distance 7
Carmarthen Bay SPA	e_Name	Settlement	_Plan_Period	Households(x2.4)	nd_The_Pla	Housing_Cor	LDP2_Reference	km or less
Bae Caerfyrddin /								
Carmarthen Bay	South of Rock Park	Kilgetty	19	45.6	0	Residential A	HSG/050/LDP2/1	2.0
Bae Caerfyrddin /								
Carmarthen Bay	Land at Coppins Park	Pentlepoir	11	26.4	0	Residential A	HSG/099/LDP2/1	2.5
Bae Caerfyrddin /								
Carmarthen Bay	North of Begelly Farm	Begelly	46	110.4	0	Residential A	HSG/003/LDP2/1	3.3
Bae Caerfyrddin /								
Carmarthen Bay	South of The Crown	Jeffreyston	8	19.2	0	Residential A	HSG/047/LDP2/1	5.6
Bae Caerfyrddin /								
Carmarthen Bay	North of Parsons Green	St Florence	20	48	0	Residential A	HSG/123/LDP/01	6.3
Bae Caerfyrddin /								
Carmarthen Bay	West of Kings Park Farm	Templeton	14	33.6	0	Residential A	HSG/132/LDP2/1	6.5
Totals (6 sites)			118	283	0			

Castlemartin Coast SPA

Castlemartin Coast			Minimum_Units_In		Units_Beyo			Distance 7
SPA	Site_Name	Settlement	_Plan_Period	Households(x2.4)	nd_The_Pla	Housing_Con	LDP2_Reference	km or less
Castlemartin Coast	Former Hakin Infants' School	Milford Haven	14	33.6	0	Residential A	HSG/086/LDP2/4	4.8
Castlemartin Coast	Former Hakin Junior School	Milford Haven	43	103.2	0	Residential A	HSG/086/LDP2/6	4.9
Castlemartin Coast	Former Hubberston VC School, F	Milford Haven	26	62.4	0	Residential A	HSG/086/LDP2/5	5.0
Castlemartin Coast	South of Cleggars Park	Lamphey	55	132	0	Residential A	HSG/052/00011	5.3
Castlemartin Coast	South East of Southlands St. Dani	Pembroke	26	62.4	0	Residential A	HSG/095/LDP2/5	5.3
Castlemartin Coast	South West of Southlands, St. Da	Pembroke	19	45.6	0	Residential A	HSG/095/LDP2/2	5.3
Castlemartin Coast	Between St Daniels Hill & Norgar	Pembroke	147	352.8	0	Residential A	HSG/095/LDP2/1	5.4
Castlemartin Coast	Land at West End Cottages	Hundleton	14	33.6	0	Residential A	HSG/046/LDP2/1	5.6
Castlemartin Coast	West of Stranraer Road	Pembroke Dock	59	141.6	0	Residential A	HSG/096/LDP2/2	5.6
Castlemartin Coast	Adjacent to Lamphey School	Lamphey	40	96	0	Residential A	HSG/052/LDP2/1	5.6
Castlemartin Coast	South West of The Meads	Milford Haven	93	223.2	0	Residential A	HSG/086/00222	5.7
Castlemartin Coast	North of Gibbas Way	Pembroke	43	103.2	43	Residential A	HSG/095/00144	6.0
Castlemartin Coast	Land at Myrtle Meadows, Steynto	Milford Haven	60	144	0	Residential A	HSG/086/LDP2/1	6.4
Castlemartin Coast	East of Hazelbank	Llanstadwell	10	24	0	Residential A	HSG/066/LDP2/1	6.6
Castlemartin Coast	East of Golden Hill Road	Pembroke	50	120	0	Residential A	HSG/095/LDP2/4	6.7
Castlemartin Coast	East of Castle Pill Road Steynton	Milford Haven	23	55.2	0	Residential A	HSG/086/LDP2/2	7.0
Castlemartin Coast	South of Conway Drive, Castle Pi	Milford Haven	117	55.2	163	Strategic Allo	S/HSG/086/LDP2/3	6.8
Castlemartin Coast	Land south of Sycamore Woods a	Pembroke Dock	9	21.6	0	Residential A	HSG/096/LDP2/3	6.8
Totals (18 sites)			848	1810	206			