

Local Development Plan Initial Sustainability Appraisal (Strategic Environmental Assessment) Report and Habitats Regulations Appraisal Screening Report

Consultation Responses and Council Position

March 2019

The SA Report was open for statutory consultation and a wider consultation from 17 December 2018 to 4 February 2019. The statutory consultees are Natural Resources Wales and Cadw. The document was available for a wider consultation.

A total of 3 representors commented. For a summary of consultation comments and officer responses to them see Table 1 below. Responses are presented in the format that they were received and have not been edited.

The consultation responses set out in Table 1 below have been structured according to the questions set out in the response forms which asked the following;

1. Assessment of the vision and objectives
2. Assessment of the LDP Preferred Option
3. Assessment of the LDP Strategic Policies
4. Assessment of the LDP General Policies
5. Other comments.
6. HRA comments

Table 1: Consultation responses to the Initial SA Report

Representation Number (rep id/rep no)	Representor Surname / Organisation	Representation Full Text	Advisory Response Type	Council Position
1491/PS/SA/01	PCNPA	<u>Q1 Assessment of the LDP Vision and Objectives</u> There is likely to be a link between Objective 2 (health and well-being) and “Town Centres are vibrant places where a range of uses take place”. Currently the assessment says “no direct link”. A vibrant town centre with a range of uses has the potential ensure that communities have access to key facilities and services, which would include health care (see PCC’s assessment of this part of the vision against SA Objective 6). It is suggested this be changed to a positive assessment.	Minor change proposed.	Proposed change to matrix takes account of the link between Objective 2 and Town Centres.
1491/PS/SA/02	PCNPA	SA Objective 7 is also assessed as having no direct link with Vibrant Town Centres. It is suggested that this is also changed to a positive assessment as Town Centres are community hubs that provide excellent places for cultural exchange and use of Welsh language.	Minor change proposed.	Proposed change to matrix takes account of the link between Objective 7 and Town Centres.
1491/PS/SA/03	PCNPA	Q2 Assessment of LDP Preferred Option No comments	No change proposed.	No amendment necessary.
1491/PS/SA/04	PCNPA	Q3 Assessment of LDP strategic policies SP2 – Housing requirement, assessment against SA Objective 10. The impact here is likely to be negative since the development of 6,800 new homes will increase emissions due to energy use, waste and travel. Mitigation measures required by National Policy may allow the reduction of per capita Carbon emissions.	Minor change proposed.	Proposed change to matrix takes account of uncertainty surrounding the building of new homes and impacts on climate change.
1491/PS/SA/05	PCNPA	SP2 – Housing requirement, assessment against SA Objective 14. Household and population increase will place increased pressure on inland water bodies for abstraction.	Minor change proposed.	Proposed change to matrix takes account of uncertainty surrounding the building of new homes and impacts on water resources.
1491/PS/SA/06	PCNPA	SP2 – Housing requirement, assessment against SA Objective 15. Housing developments should also not increase flood risk according to National Policy, as well as not be built in areas at risk of flooding.	Minor change proposed.	Proposed change to matrix takes account of uncertainty surrounding the building of new homes and impacts on flooding.
1491/PS/SA/07	PCNPA	SP 13 - Employment land, assessment against SA Objective 10. Would suggest that any development is going to have a negative impact against this objective both during construction and during operation due to energy use, transportation and waste. The only uncertainty is the scale to which this occurs.	Minor change proposed.	Proposed change to matrix takes account of uncertainty surrounding the building of new homes and impacts on climate change.
1491/PS/SA/08	PCNPA	SP 13 - Employment land, assessment against SA Objective 12.	No change proposed.	The assessment acknowledges that this is

		As above: Would suggest that any development is going to have a negative impact against this objective both during construction and during operation due to energy use, transportation and waste. The only uncertainty is the scale to which this occurs.		dependent on the nature of developments that come forward.
1491/PS/SA/09	PCNPA	<p><u>Q4 Assessment of LDP General Policies</u> GN.1 – General Development Policy, assessment against SA Objective 17. Should the policy make a more direct reference to soils? Protection of soils is implied by “...protects the natural environment” but the protection of other features such as water are mentioned more specifically.</p>	No change proposed.	No amendment necessary. The reasoned justification (supporting text) of the Policy includes reference to soils in 7.4 “Any development proposal must therefore demonstrate that it respects the natural environment, the landscape character, coherence and integrity, native species, soils, and ground and surface waters.”
1491/PS/SA/10	PCNPA	GN.1 – General Development Policy, assessment against SA Objective 20. Policy seems to be lacking any reference to the historic environment in general beyond character. What about archaeology?	No change proposed.	No amendment necessary. A separate policy on historic environment, which will include archaeology will be included in the Deposit Plan.
1491/PS/SA/11	PCNPA	GN.3 -Infrastructure and New Development, assessment against SA Objective 9. Does the broad band element of the policy potentially contribute to the object by enabling home working? (reducing the need to travel).	Minor change proposed.	Proposed change to the matrix to take account of broadband enabling home working (and reducing the need to travel).
1491/PS/SA/12	PCNPA	GN.4 Resource Efficiency and Renewable and Low-carbon Energy, assessment against SA Objective 4. This assessment is indicated to contribute to the SA Objective but the commentary says that the policy has no direct relationship. It also includes a paragraph about sustainable transport, which isn’t part of this policy or its reasoned justification. Suggest removing the paragraph and changing the assessment to ‘0’.	Minor change proposed.	Proposed change to remove reference to sustainable transport.
1491/PS/SA/13	PCNPA	GN.4 Resource Efficiency and Renewable and Low-carbon Energy, assessment against SA Objective 11. Some renewable energy projects can have an impact on air quality, specifically wood burning/biomass systems.	Minor change proposed.	Proposed change to include reference to wood burning and biomass systems potentially impacting air quality.
1491/PS/SA/14	PCNPA	<p>Q5 Other comments Would suggest including full policy text in all assessment matrices so that readers do not need to alternate between the Preferred Strategy and the SA to fully grasp what measure a policy covers, and therefore which SA Objectives are relevant to the assessment.</p>	Minor change proposed.	Proposed changes improves the clarity of the assessments. Full policy text will be added to the Initial SA Report and subsequent assessments.
1507/PS/SA/01	WG	<p><u>SA Report - general comments from WG letter</u> As always, we would urge you to seek your own legal advice to ensure that you have met all the procedural requirements, including Sustainability Appraisal (SA) Strategic Environmental</p>	No change proposed.	Welsh Governments comments in relation to the procedural requirements of SA, SEA and HRA are noted.

		Assessment (SEA) and Habitats Regulation Assessment (HRA) as responsibility for these matters rests with your Authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality		
1491/PS/HRA/01	PCNPA	<p><u>HRA Screening Report</u> It is suggested that the Preferred Strategy should include specific policy wording in regard to sites and species of European importance. This might be included within SP11, or as additional policy. Screened-in elements of the Preferred Strategy may then be amended to cross-refer to this policy wording, e.g. 'subject to there being no unacceptable adverse effects on Pembrokeshire's environment (see SP11), including sites and species of European importance (see SP11 (and / or new policy reference))'.</p> <p>This would complement the approach taken in Pembrokeshire Coast National Park Local Development Plan 2 and enhance the compatibility of the plans.</p>	No change to Preferred Strategy proposed.	A policy on biodiversity will be included at Deposit Plan Stage, which will include specific reference to Natura 2000 sites or wording will be included to reference Natura 2000 sites. Subsequent screening as part of the HRA will then be undertaken accordingly.
1475/PS/HRA/01	NRW	<p><u>HRA Screening Report</u> Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales on the above Habitats Regulations Appraisal Screening Report, which we received on 17 December 2018. Having reviewed the above report we are satisfied that it includes all the necessary information, including details on the SAC's and SPA's in and bordering Pembrokeshire.</p>	No change proposed	Support welcomed, no amendment necessary.