



# Planning Pembrokeshire's Future **Local Development Plan**

**Cynllun Datblygu Lleol**  
Cynllunio Dyfodol Sir Benfro



Pembrokeshire County Council  
Local Development Plan 2  
2017-2033

Deposit 2 Plan HRA: September 2024

Focussed Changes: July 2025 (track changes accepted)

Inspectors' Initial Questions letter: March 2026

- Edits for Inspectors' Initial Questions shown as track changes.
- For ease of reading whole new sections/paragraphs/tables and figures are not shown as track changes but are highlighted with the label **NEW**.
- New sections/paragraphs/tables and figures taken from the Position Statement on Nitrogen 8<sup>th</sup> October 2025 are also highlighted with the label **PS**.

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.

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Date: 20 March 2024

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## 1. Executive Summary

- 1.1. The [Pembrokeshire County Council Local Development Plan 2 \(LDP2\)](#) 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. [This updated Habitats Regulations Assessment \(HRA\), incorporating the latest Natural Resources Wales \(NRW\) advice, new national guidance \(2021–2025\), and the Council's focussed changes, evaluates whether LDP2 could give rise to adverse effects on the integrity of European sites \(SACs, SPAs and Ramsar sites\), either alone or in combination with other plans or projects.](#)
- 1.2. 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:

**Table 1 Stage 1 Initial Screening of European Sites**

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 Bosherton 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	

- 1.3. 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.
- 1.4. The initial policy screening (HRA Stage 1) found:
1. The Plan's introductory chapters, vision and objectives can be screened out.
  2. [42-15](#) out of the 21 Strategic Policies would be Likely to have a Significant

Effect (LSE) without mitigation.

3. 25-35 General Policies would be Likely to have a Significant Effect (LSE) without mitigation .

4. All site allocations and commitments (housing, employment, mixed-use, minerals, transport, community facilities, and Gypsy/Traveller sites) were screened in initially.

5. Impact pathways include:

- Water quality (phosphate and nitrogen increases in sensitive catchments)
- Recreation pressure
- Air quality (proximity to road emissions)
- Loss of functionally linked land
- Construction-related disturbance

~~4.6. 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.~~

~~5.7. Appendices to the Plan: The appendices can be screen out.~~

1.5. 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.

1.6. All European sites excluding Grassholm SPA will be impacted by LSE resulting from policies and allocations.

**Table 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
	Carmarthen Bay Dunes SAC	No - lack of likely commuting routes associated with allocations
Water Quality	Afonydd Cleddau SAC (Nutrient Neutrality) Pembrokeshire Marine SAC (Nutrient Neutrality) Carmarthen Bay SAC	Yes

Impact Pathway	Affected Designated Site	Screened in for AA
	Carmarthen Bay SPA. Cardigan Bay SAC Afon Teifi SAC Gweunydd Blaencleddau SAC North Pembrokeshire Woodlands SAC	
Recreation	All sites excluding: 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 Bosherton Lakes SAC Yerbeston Tops SAC	Yes
Disturbance	Pembrokeshire Marine SAC West Wales Marine SAC	Yes

1.7. On the basis of the information available to PCC, the **Stage 2** Appropriate Assessment identified that the current plan following policies for mitigation.

**Table 3 Strategic Policies Requiring Further Mitigation**

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
<u>SP 13: Port and energy-related Development and Celtic Freeport</u>
SP14: Strategic Employment Provision Part 2 Allocations
SP15: Safeguarding of Existing Employment Sites Part 2 Safeguarded

Strategic Policy
Sites
SP16: Retail Hierarchy
SP17: Visitor Economy
SP20: Transport Infrastructure and Accessibility

**Table 4 General Policies Requiring Further Mitigation**

General Policy
<a href="#"><u>GN 02 Sustainable Design</u></a>
<a href="#"><u>GN 03 Infrastructure and New Development</u></a>
<a href="#"><u>GN 04 Resource Efficiency and Renewable and Low-carbon Energy Proposals</u></a>
GN 5 Renewable Energy - Part 2 Allocations
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
GN 10 Mixed-use Housing and Employment Proposals Part 1 Policy and Part 2 Allocations
GN 11 Protection of Employment Sites and Buildings
GN 12 Extensions to Employment Sites
GN 13 Residential Development
<a href="#"><u>GN 14 Replacement Dwellings in the Countryside</u></a>
GN 16 Residential Allocations
<a href="#"><u>GN 17 Residential Commitments</u></a>
GN 18 Slade Lane, Haverfordwest
GN 19a Maesgwynne, Fishguard
GN 19b South of Conway Drive, Castle Pill Road, Steynton –
GN 21 Exception Sites for Local Needs Affordable Housing
GN 22 Specialist and Supported Accommodation
GN 23 Specialist and Supported Accommodation Allocations
GN 24 Gypsy and Traveller Site Allocations
GN 25 Gypsy and Traveller Sites and Pitches
GN 28 Protection and Enhancement of the Historic Environment
GN 29 Community Facilities

General Policy
GN 30 Community Facility Allocations
GN 31 Retail and Commercial Centre Development
GN 32 Out-of-Centre Retail and Commercial Development
GN 33 Farm Diversification
GN 34 Conversion or Change of Use of Agricultural Buildings
GN 35 Marinas
GN 36 Transport Routes and Improvements – <u>2.4</u> safeguarded sites <del>TS/LDP2/03 Road &amp; Footpath Well Hill improvement, Pembroke Well Hill – Pembroke &amp; TS/LDP2/08 Public Transport Interchange – Haverfordwest public transport interchange Haverfordwest Bus Station</del> This policy has two elements.
GN 37 – Working of Minerals –allocation - MN/000/LDP2/001 Trefigin Quarry extension
<u>GN 38 – Safeguarding and Prior Extraction of the Mineral Resource</u>
<u>GN 39 – Secondary Aggregates and Recycled Waste Minerals</u>
GN 41 Protection of National Statutory Environmental Designations
<u>GN 47 Water Quality and Protection of Water Resources</u>
<u>GN 53 Community Growing Spaces</u>
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 Part 1 Policy and Part 2 Allocations
GN 60 Disposal of Waste on Land

### **Construction and Functionally Linked Land**

1.8. Without strengthened safeguards, construction-phase impacts and loss/disturbance of off-site habitats supporting qualifying species (birds, bats, otter, etc.) could lead to adverse effects. Strengthening SP 12 and GN 41 is required to ensure project-level HRA controls are embedded.

1.8.1.9. Maintaining and Enhancing the Natural Environment implemented within LDP2 ~~is~~ are 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.

4.9.1.10. Additional mitigation is required to fully mitigate adverse effects on site integrity resulting from the appropriate assessment of the following Policies listed above and all allocations and commitments (except those that are except for two transport improvement schemes ;screened out, (including reserved matters approval where appropriate), where all relevant conditions have been discharged.

4.10.1.11. 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.

### **Recreation**

4.11.1.12. 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.

### **Water quality (phosphate and nitrogen increases in sensitive catchments)**

4.12.1.13. 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 a suite of policies is proposed for amendment including amendments to SP 12, GN 41, and the renaming/elevation of GN 47 to Strategic Policy SP12A to secure water quality protections and nutrient neutrality standards. Additional safeguards include SuDS requirements, “fair share” catchment budgeting, and stricter phasing of housing where mitigation is not yet secured.

### **New Table 5 Mitigation Required regarding Phosphates**

<u>SP 2 Housing Requirement</u>
<u>SP 4 Gypsy, Traveller and Show-people’s Accommodation</u>
<u>SP 5 Supporting Prosperity</u>
<u>SP 8 Regional Growth Areas and Urban Settlements</u>
<u>SP 9 Service Centres and Service Villages</u>
<u>SP 10 Local Villages</u>
<u>SP 12 Maintaining and Enhancing the Natural Environment</u>
<u>SP 12A Water Quality and Protection of Water Resources (formerly GN 47)</u>
<u>SP 13 Port and Energy Related Development and Celtic Freeport</u>

<a href="#"><u>SP 14 Strategic Employment Provision</u></a>
<a href="#"><u>SP 15 Safeguarding of existing Strategic Employment Sites</u></a>
<a href="#"><u>SP 15 Safeguarding of existing Strategic Employment Sites</u></a>
<a href="#"><u>GN 2 Sustainable Design and Placemaking</u></a>
<a href="#"><u>GN 3 Infrastructure and New Development</u></a>
<a href="#"><u>GN 9 Employment Allocations</u></a>
<a href="#"><u>GN 10 Mixed-Use Proposals</u></a>
<a href="#"><u>GN 13 Residential Development</u></a>
<a href="#"><u>GN 16 Residential Allocations</u></a>
<a href="#"><u>GN 17 Residential Commitments (planning status dependant)</u></a>
<a href="#"><u>GN 30 Community Facility Allocations</u></a>
<a href="#"><u>GN 24 Gypsy and Traveller Site Allocations</u></a>
<a href="#"><u>GN 23 Specialist and Supported Accommodation Allocations</u></a>
<a href="#"><u>GN 24 Gypsy and Traveller Site Allocations</u></a>
<a href="#"><u>GN 24 Gypsy and Traveller Site Allocations</u></a>
<a href="#"><u>GN 25 Gypsy, Traveller and Show-people's Sites</u></a>
<a href="#"><u>GN 36 Transport Routes and Improvements</u></a>
<a href="#"><u>GN 38 Safeguarding and Prior Extraction of the Mineral Resource</u></a>
<a href="#"><u>GN 41 Protection of National Statutory Environmental Designations</u></a>
<a href="#"><u>GN 59 Waste Management Facilities</u></a>

~~1.13.1.14. \_\_\_\_\_, 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.~~

1.15. Nitrogen issues, following NRW's 2025 guidance for the **Milford Haven Inner sub-catchment** and related freshwater SACs (Western and Eastern Cleddau), require further mitigation. Several strategic and general policies must be strengthened to ensure nitrogen neutrality or demonstrate catchment improvements. To mitigate the increase in nitrogen to the Cleddau catchment a suite of policies is proposed for amendment.

**New** Table 6 Mitigation Required regarding Nitrogen

<a href="#"><u>SP 2 Housing Requirement</u></a>
<a href="#"><u>SP 4 Gypsy, Traveller and Show-people's Accommodation</u></a>
<a href="#"><u>SP 5 Supporting Prosperity</u></a>
<a href="#"><u>SP 08 - Regional Growth Areas</u></a>
<a href="#"><u>SP9: Service Centres and Service Villages</u></a>
<a href="#"><u>SP13: Port and energy-related Development and Celtic Freeport</u></a>
<a href="#"><u>SP 14 Strategic Employment Provision</u></a>
<a href="#"><u>SP 15 Safeguarding of existing Strategic Employment Sites</u></a>
<a href="#"><u>GN 2 Sustainable Design</u></a>
<a href="#"><u>GN 3 Infrastructure and New Development</u></a>
<a href="#"><u>GN 9 Employment Allocations</u></a>
<a href="#"><u>GN 10 Mixed-Use Proposals GN 13 – Residential Development</u></a>
<a href="#"><u>GN 16 Residential Allocations</u></a>
<a href="#"><u>GN 17 Residential Commitments (planning status dependant)</u></a>
<a href="#"><u>GN 23 Specialist and Supported Accommodation Allocations</u></a>
<a href="#"><u>GN 24 Gypsy and Traveller Site Allocations</u></a>
<a href="#"><u>GN 25 Gypsy and Traveller Sites and Pitches</u></a>
<a href="#"><u>GN 30 Community Facilities Allocations</u></a>
<a href="#"><u>GN 36 Transport Routes and Improvements</u></a>
<a href="#"><u>GN 38 – Safeguarding and Prior Extraction of the Mineral Resource</u></a>
<a href="#"><u>GN 41 Protection of National Statutory Environmental Designations</u></a>
<a href="#"><u>GN 59 Waste Management Facilities</u></a>

1.16. In terms of air quality, it is considered that there will be no significant additional contributions to nitrogen and ammonia levels from the proposed plan. Although several sites lie within 200m of roads, the assessment concludes **no significant additional contribution** to exceedances of critical loads or levels is expected from the plan.

4.14.1.17. 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 Trefign Quarry Site allocation under Policy GN 37 are also highlighted.

4.15.1.18. Due to the implementation of the mitigation measures explained above, the LDP2 will lead to no adverse effect on European Sites listed above.

**In-combination**

1.19. 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

<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.

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.

1.20. Nutrient management for phosphates at a river catchment level (includes neighbouring authorities) uses the integrated/fair share approach which provides for the safeguarding of the integrity of sites, i.e. considering in-combination effects is inherent to the approach. If this is not achievable in practice then nutrient neutrality is required.

1.21. Nutrient neutrality is mandated for nitrogen so there can be no in-combination effects with other plans and projects. 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, Carmarthenshire County Council and Ceredigion County Council are required to undertake similar assessments for new development proposals under their respective adopted Local Development Plans.

## **New Overall Conclusion**

1.22. With the strengthened suite of policies, cross-references, nutrient mitigation frameworks, and implementation mechanisms, the HRA concludes that LDP2 can be implemented without adverse effects on the integrity of any European site, provided that:

- all recommended policy amendments are incorporated into the final plan, and
- all planning applications comply with the updated mitigation requirements and project-level HRA processes.

## 2. Introduction

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### The overall Plan

- 3.1 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.
- 3.2 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.
- 3.3 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 guidance<sup>2</sup> had been put in place in Wales.

[3.4 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. NRW comments on this HRA resulted in a revised HRA \(for the Focussed Changes consultation\). Since that time the publication of the Practical planning guidance to support development, in SAC river catchments affected by phosphorous by DTA and Welsh Government in](#)

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

August 2025<sup>3</sup> and NRW's publication of the Conditions Assessment<sup>4</sup> for the marine SACs in Wales with nutrient neutrality mandated for the Milford Haven Inner sub-catchment and areas draining into this, which include the upstream freshwater SAC catchment of the Western and Eastern Cleddau) have resulted in the need to carry out a further revision to this HRA.

## Legislation Summary

**3.43.5** Under the Conservation of Habitats and Species Regulations 2017 (as amended)<sup>5</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.

**3.53.6** 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).

**3.63.7** The UK Government has also advised that Ramsar sites should be considered and included within the assessment<sup>6</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).

**3.73.8** 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'.

<sup>3</sup> <https://www.gov.wales/development-special-areas-conservation-sac-rivers-interim-planning-policy-statement>

<sup>4</sup> <https://www.naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/condition-assessments-for-welsh-european-marine-sites-ems/?lang=en> - see in particular conditions assessments and conservation advice for Pembrokeshire Marine SAC, Cardigan Bay SAC, Carmarthen Bay SAC, Grassholm SPA, Carmarthen Bay SPA, Cardigan

<sup>5</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>6</sup> Department for Communities and Local Government (2012) National Planning Policy Framework.

## Potentially Affected Habitat Sites

**3.83.9** 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:

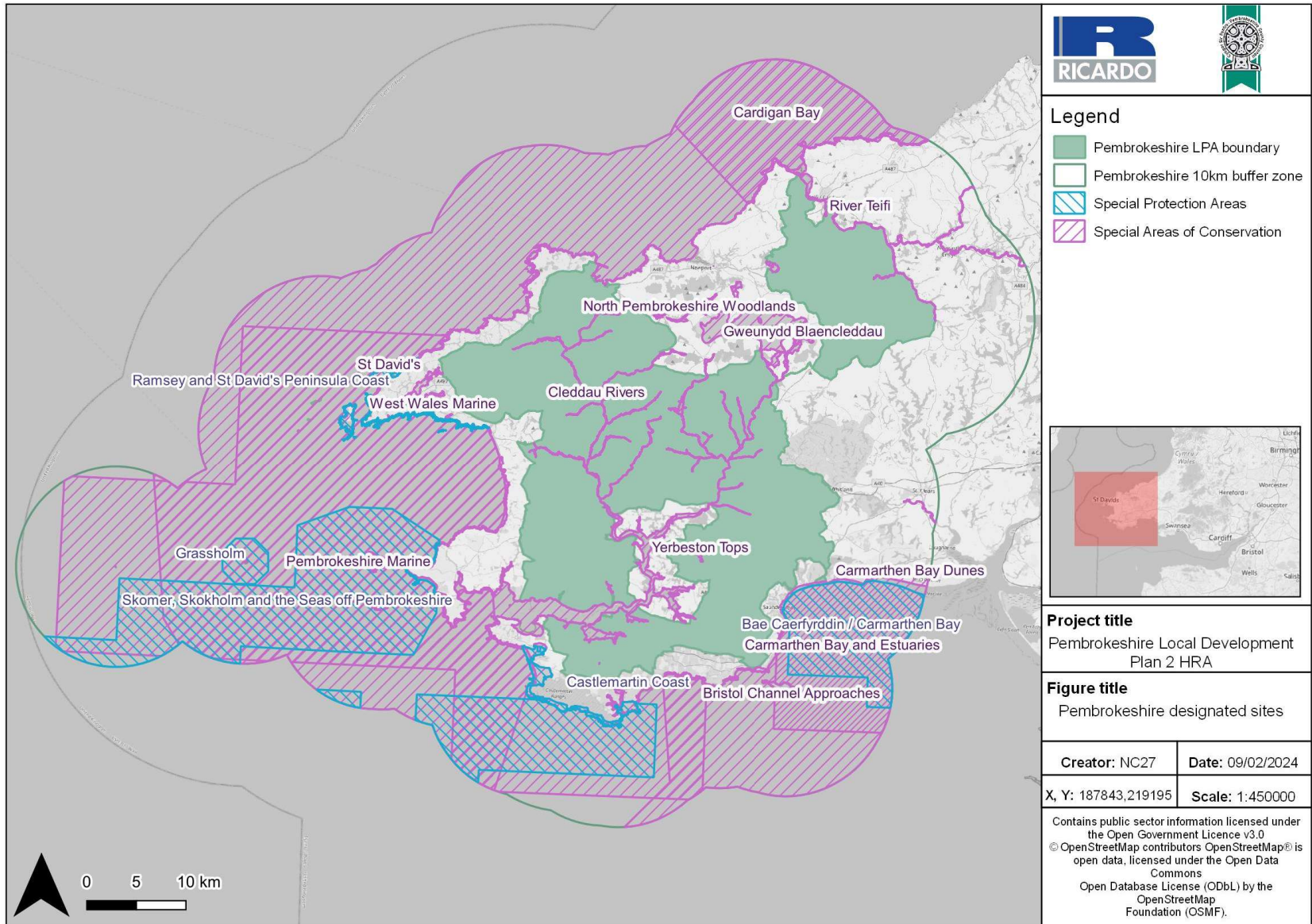
**Table 7 Potentially Affected Habitat Sites**

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
West Wales Marine SAC	Limestone Coast SAC
Yerbeston Tops SAC	Carmarthen Bay Dunes SAC
Castlemartin Coast SPA	Pembrokeshire Marine SAC
Pembrokeshire Bat Sites and Bosherton Lakes SAC	Afonydd Cleddau SAC
North Pembrokeshire Woodlands SAC	Northwest Pembrokeshire Commons SAC
Skomer Skokholm and Seas SPA	

## Purpose of this report

**3.93.10** 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 Table 1 Stage 1 Initial Screening of European Sites above. A summary of the HRA process that informs this purpose is provide in [Chapter 2](#) below.

**Figure 1 Local Development Plan Area and Relevant European Site**



## 3. Methodology

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### Guidance

3.1 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

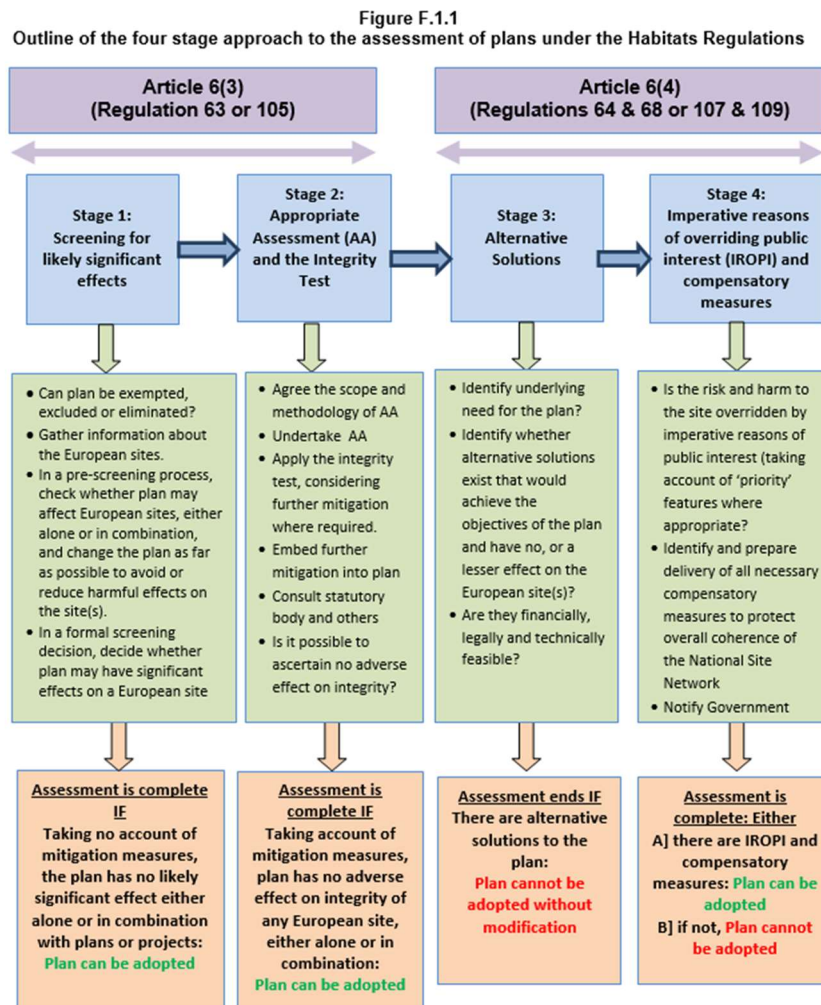
3.2 An HRA determines whether there will be any 'likely significant effects' (LSE) on any European site as a result of a plan's implementation (either on its own or 'in-combination' with other plans or projects)<sup>7</sup> and, if so, whether there will be any 'adverse effects on site integrity'<sup>8</sup>.

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<sup>7</sup> Also referred to as the 'test of significance'.

<sup>8</sup> Also referred to as the 'integrity test'.

**Figure 2 Stages of Habitats Regulations Assessment for Plans**



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

- 3.3 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.
- 3.4 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.
- 3.5 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).

- 3.6 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

- 3.7 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.
- 3.8 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>9</sup>
- 3.9 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 in-combination 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>10</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.

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<sup>9</sup> People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018.

<sup>10</sup> Annexes are contained within the relevant EC Directive.

3.10 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.

### Screening of revised LDP2

3.11 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'.<sup>11</sup> Section F.6.3 introduces 'screening categories' against which each policy within a plan should be assessed. The screening categories are shown in Table 8 below.

**Table 8 Screening categories used for high level screening of plans and policies**

Category	Description	Screening Outcome
<b>A</b>	General statements of policy/general aspirations.	<b>Screen Out</b>
<b>B</b>	Policies listing general criteria for testing the acceptability/sustainability of proposals.	<b>Screen Out</b>
<b>C</b>	Proposal referred to but not proposed by the plan	<b>Screen Out</b>
<b>D</b>	Environmental protection/site safeguarding policy	<b>Screen Out</b>
<b>E</b>	Policies or proposals which steer change in such a way as to protect European sites from adverse effects	<b>Screen Out</b>
<b>F</b>	Policy that cannot lead to development or other change	<b>Screen Out</b>
<b>G</b>	Policy or proposal that could not have any conceivable effect on a site	<b>Screen Out</b>
<b>H</b>	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)	<b>Screen Out</b>
<b>I</b>	Policy or proposal with a likely significant effect on a site alone	<b>Screen In</b>
<b>J</b>	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.	<b>Check for in-combination effects and re-categorised as K or L</b>
<b>K</b>	Policy or proposal not likely to have significant effect either alone or in combination.	<b>Screen out after in-combination test</b>
<b>L</b>	Policy or proposal likely to have a significant effect in combination	<b>Screen in after in-combination test</b>

<sup>11</sup> <https://www.dtapublications.co.uk/handbooks>

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

3.12 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

3.13 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).

3.14 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>12</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

3.15 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 their interest features; the current pressures and threats for the sites; and the

<sup>12</sup> Boggis and Another v Natural England: Court of Appeal, 20 Oct 2009

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

3.16 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>13</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>14</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

3.17 The DTA HRA Handbook<sup>15</sup> provides guidance on **Table 3**, 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).

3.18 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 'no effects' on sites beyond this distance (and so no possibility of 'in-

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<sup>13</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>14</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>14</sup>

<sup>15</sup> Tyldesley, D. & Chapman, C. (2021). The Habitats Regulations Assessment Handbook [online]. DTA Publications Limited.



housing/ growth). JNCC guidance (JNCC Report 696)<sup>16</sup> 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.

- 3.20 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 10 Extract from JNCC guidance (JNCC Report 696)**

**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/m <sup>3</sup> )	1% of CL for ammonia (1 µg/m <sup>3</sup> )	1% of CL for ammonia (3 µg/m <sup>3</sup> )
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

<sup>16</sup> <https://data.jncc.gov.uk/data/6cce4f2e-e481-4ec2-b369-2b4026c88447/JNCC-Report-696-Main-FINAL-WEB.pdf>

**Table 11 Extract from JNCC guidance (JNCC Report 696)**

**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)
<b>Deposition to forest vegetation</b>				
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
<b>Deposition to short vegetation</b>				
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**

3.21 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 no discernible 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 in-combination Plans/Projects with the Competent Authority before doing the assessment.
- **STEP 5** – Assess these other Plans/Projects in combination with this Plan.

3.22 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.

3.23 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

3.24 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). Pembrokeshire County Council has also liaised and consulted with Natural Resources Wales on the preparation of the Deposit 2 Local Development Plan (including the Focussed Changes). The Council has also liaised with Natural Resources Wales on preparation of the Position Statement on Nitrogen which has been included in this Composite HRA. The Council has also consulted with NRW on this Composite HRA.

### Impact assessment

3.25 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.

3.26 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.

- 3.27 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.
- 3.28 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 in-combination) 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.
- 3.29 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**

3.30 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**

3.31 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.

3.32 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.

3.33 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**

3.34 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

- 3.35 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>17</sup> and some key generic principles are summarised in Table 6 below:

<b>Table 12 Key overarching principles from section C.11 of the HRA handbook</b>
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 competent authority is ‘convinced’ about the lack of effects on integrity which will be the case where no

<sup>17</sup> Tyldesley, D. and Chapman, C., (2013) [The Habitats Regulations Assessment Handbook](#), October 2024 Edition UK, DTA Publications Limited.

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.

- 3.36 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”

- 3.37 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

- 3.38 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.

- 3.39 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.

- 3.40 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.

- 3.41 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.

3.42 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:

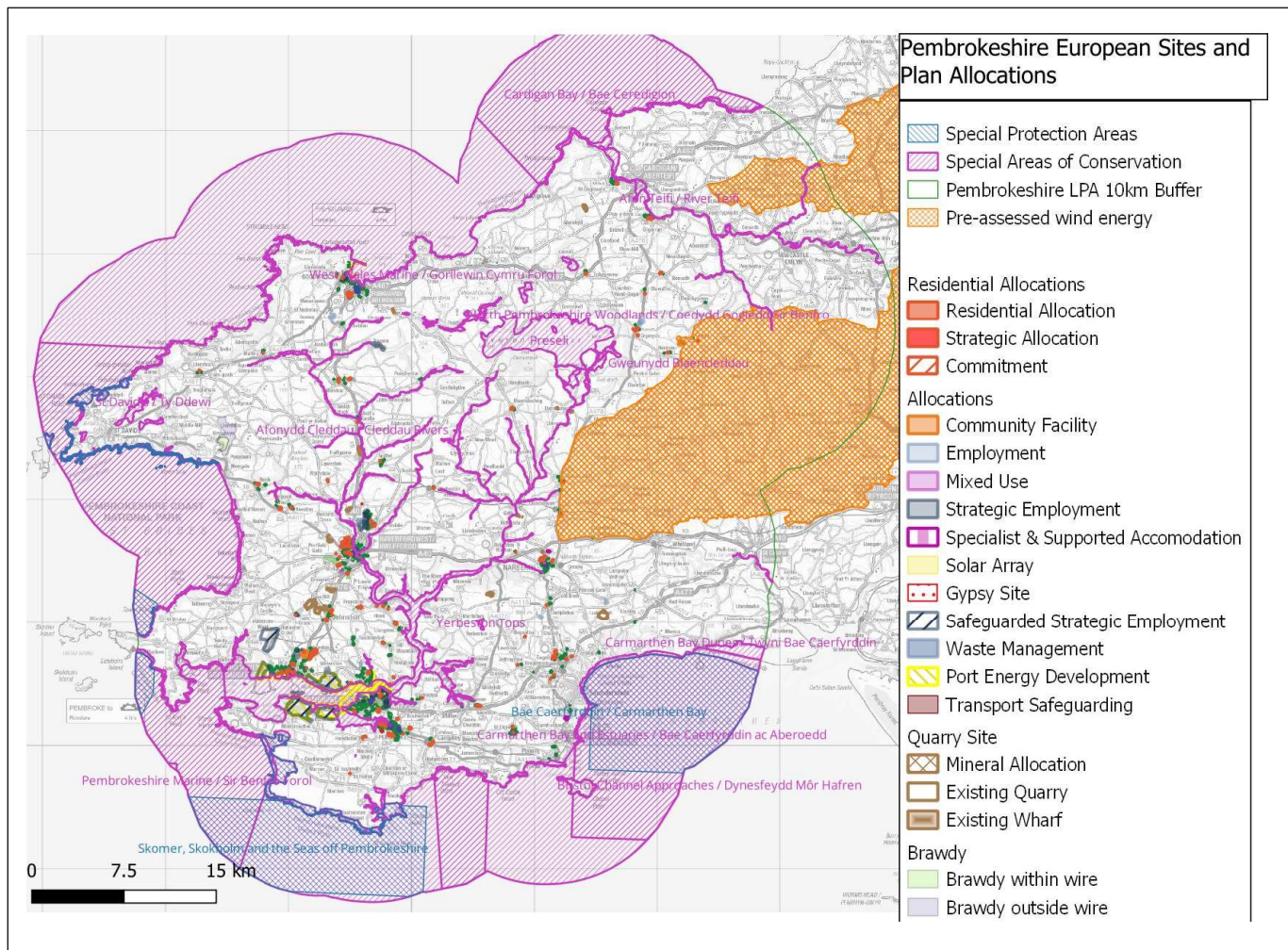
- Areas of search for sand and gravel.
- Quarry/mineral site extensions.
- Major minerals proposals.
- Major waste proposals, including landfill site extension, waste sites.
- Others as identified during the process.

## 4. HRA Stage 1 Screening

### Identification of Likely Significant Effects

4.1. 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**.

**Figure 3 Local Development Plan Area and relevant European sites**



## HRA Stage 1 Screening

4.2. Using the methodology outlined in Chapter 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 13 Screening of LPD2 Introductory Chapters, Vision and Objectives.
- ~~12-15~~ out of the **21 Strategic Policies** have been in screened for LSE as seen in the summary Table 14 Screening of LDP2 Strategic Policies.
- ~~25-35~~ **General Policies** (excluding those that just identify allocated land for development) have been screened in for LSE as seen in Table 15 Screening of LPD2 General Policies.
- **Allocations:** All allocations ~~except for two transport improvement schemes~~ have initially been screened in as they are likely to have LSE on European sites without mitigation – see Table 14 in part and Table 15 below.
- **General Policies: Policy GN 17 Commitments:** In the case of CG Fry & Son Ltd vs SSHCLG [2025], the Supreme Court held that the Court of Appeal interpreted regulation 63 of the Habitats Regulation correctly. It found that for development that has a potential to impact a site protected by the Habitats Regulations, a decision that would result in an authorisation for a project to commence (i.e. reserved matters approval or approval through the discharge of conditions) would require an “appropriate assessment” to be undertaken and positively concluded prior to approval being issued. The screening undertaken for Policy GN 17 Residential Commitments reflects this judgement in so far as the screening only screens out sites with permission, (including reserved matters approval where appropriate), where all relevant conditions have been discharged. Initially, all commitment sites listed under this policy are screened in.
- **Appendices to the Plan:** - See commentary below under paragraph 4.7 below. The appendices can be screen out.

4.3. Those policies and allocations, i.e. those that have been screened in, have been progressed to Stage 2 Appropriate Assessment.

4.4. All European sites excluding Grassholm SPA will be impacted by LSE resulting from policies and allocations. The list of screened in European sites of the European sites can be found in Table 16. The initial screening of European sites can be found in Appendix A HRA Stage 1 Screening Initial Review.

4.5. Screening of allocations and commitments in relation to phosphates and nitrogen can be found in Appendix B.1 and Appendix B.2 respectively

4.5. Screening of allocations and commitment sites in relation to recreational impacts can be found in Appendix C.-

**-Introductory Chapters, Vision and Objectives**

4.6. 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 13 Screening of LPD2 Introductory Chapters, Vision and Objectives**

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

Element of plan	Assessment and rationale	Category	Screening conclusion
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	A	Screened out
F) Protect and promote the Welsh language.	General statement	A	Screened out
G) Support a range of uses in Town Centres to assist regeneration.	General statement	A	Screened out
H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure.	General statement	A	Screened out
I) Improve access to goods and services by facilitating improvements in infrastructure <sup>18</sup> and community facilities and directing development to sustainable locations.	General statement, however there may be potential effects – implications assessed under subsequent policies	A	Screened out
J) Protect and enhance the County's environment, biodiversity and habitats.	General statement	A	Screened out
K) Prevent waste arising and ensure resources are used responsibly.	General statement, however there may be potential effects – implications assessed	A	Screened out

<sup>18</sup> Note that infrastructure includes mobile and broadband provision, transport improvements and sewerage capacity.

Element of plan	Assessment and rationale	Category	Screening conclusion
	under subsequent policies		

Strategic Policies

**Table 14 Screening of LDP2 Strategic Policies**

	Policy	Screening Category	Screening Outcome
1.	SP1: Creating Sustainable Places	B	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.

	Policy	Screening Category	Screening Outcome
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. <b>As a precautionary principle</b> 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. <b>Also nitrogen issues arise.</b> 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

	Policy	Screening Category	Screening Outcome
			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 – <del>precautionary as</del> Regional growth areas are within 10km of European sites. <u>Water quality issues arise for both phosphates and nitrates in some Regional Growth Centres.</u>
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 <u>issues arise for both phosphates and nitrates in some settlements.</u> <del>(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.</del>
10.	SP10: Local Villages	I	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. <u>Specifically, Phosphate related AA required. Of particular concern are water quality issues arise for both phosphates and nitrates arising in some settlements.</u>
11.	SP11: Countryside	I	Screened in – limited development will be permitted. <del>As a precautionary principle</del> however, <u>a</u> Although not spatially specific increased population

	Policy	Screening Category	Screening Outcome
			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	M	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
13.	SP13: Port and energy-related Development and Celtic Freeport	B/H/I	Screened <del>Out</del> In: HRA is required for proposals brought forward under SP13. 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 80, 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. <u>However, the location of the most relevant text in the reasoned justification needs to be addressed.</u>
14.	SP14: Strategic Employment Provision	H/I	Screened <del>Out</del> In: <u>This policy identifies strategic employment site allocations. The policy allows for development of land for employment at locations where impacts on European sites are possible. Project level HRA required for sites impacting</u>

	Policy	Screening Category	Screening Outcome
			<p><del>Pembrokeshire marine SAC. This policy identifies strategic employment site allocations.</del></p> <p><del>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.</del></p>
	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; Yerboston 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	I_H	Screened <del>out</del> <u>In</u> - 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. <del>However, t</del> <u>he</u> 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. <u>The location of the text is however queried and issues regarding phosphates as well as nitrogen need to be considered.</u>
	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)	I	Screened in for: Afonydd Cleddau SAC; Limestone Coast SAC; Pembs Marine SAC; W Wales Marine

	Policy	Screening Category	Screening Outcome
	Energy)		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
	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

	Policy	Screening Category	Screening Outcome
	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; Yerboston 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; Yerboston 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; Yerboston Tops SAC; ; Castlemartin SPA ; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/096/00006 S/EMP/096/C2 Waterloo & London	I	Screened in for: Bristol Channel SAC;; Pembs Marine SAC; Limestone Coast SAC; Yerboston Tops SAC

	Policy	Screening Category	Screening Outcome
	Road Industrial Estate cluster (Waterloo & London Road Industrial Estate)		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; Yerboston Tops SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; ; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
16.	SP16: Retail Hierarchy	I	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	C	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
20.	SP20: Transport Infrastructure and Accessibility	I	Screened in –.Precautionary principle Policy listing general criteria, however proposals depending on

	Policy	Screening Category	Screening Outcome
			<p>their detail and location may have a likely significant effect on European sites</p> <p>Safeguarded routes which are referred to in Policy GN 36 are considered separately.</p>
21.	SP 21 Waste Prevention and Management	F	<p>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.</p>

Table 15 Screening of LPD2 General Policies

	Policy	Category (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	<u>B</u>	Screened <del>out</del> <u>in</u> : policy listing general criteria for testing the acceptability / sustainability of proposals. <u>However, criterion 3 includes requirements for resource efficiency and climate responsive design regarding water conservation and the use of sustainable drainage systems (SuDS).</u> Screened in.
3.	GN 3 Infrastructure and New Development	<u>B</u>	Screened <del>out</del> <u>in</u> : this is a policy listing general criteria for testing acceptability defining requirements for proposals. <u>Requirements do however include the need to require appropriate contributions for water, wastewater treatment and sewerage infrastructure but this is caveated in the final paragraph. Also the prioritising of obligations may undermine the authority's ability to prioritise addressing mitigation opportunities in relation to phosphorous and nitrogen impacts.</u>
4.	GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	B / I	Screened <del>out</del> <u>in</u> : <del>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</del> 'Developments which enable the

	Policy	Category (criteria A-M)	Screening conclusion
			<p><del>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</del> This is a policy listing the general criteria for testing acceptability of renewable energy proposals. It is not spatially specific but could be relevant to schemes which could result in the release of additional nutrients into the river system.</p>
5.	<p>GN 5 Renewable Energy – target and allocations</p> <p>The policy consists of 2 parts:</p> <ul style="list-style-type: none"> <li>▪ Part 1: sets out the target per annum for renewable energy generation.</li> <li>▪ Part 2: allocates two sites for solar arrays.</li> </ul>	A	<p>For Part 1</p> <p>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.</p> <p>For Part 2</p> <p>This policy identifies solar panel array allocations which are considered in further detail below.</p>
	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; 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>19</sup> Appendix B, Table B outlines the potential impacts associated with each Pre-Assessed

<sup>19</sup> <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
			<p>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.</p> <p>Further assessment of this policy is required.</p>
7.	GN 7 Cawdor Barracks including the former Brawdy Airfield	I	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 significant effect on European sites.
8.	GN 8 Employment Proposals	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 9 Employment Allocations	—	This policy identifies employment site allocations which are considered in further detail below.
	EMP/030/00001 Parc Gwynfryn, Crymych	I	Screened in for: Afonydd Cleddau SAC; Afon Teifi SAC; N Pembs Woodlands SAC; Gweunydd Blaencleddau SAC; Preseli SAC
	EMP/034/00006 Celtic Link Business Park, near Sclleddau	I	Screened in for: Afonydd Cleddau SAC;; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
	EMP/040/LDP2/01 Witybush Showground, Haverfordwest	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Pembs Bat Sites and Bos Lakes SAC; W Wales Marine SAC

	Policy	Category (criteria A-M)	Screening conclusion
	EMP/053/00001 Old Station Yard, Letterston	I	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; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
	EMP/000/LDP2/01 Land at Princes Gate Spring Water	i	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC <del>Carms Bay Dunes SAC</del> ; Yerboston 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
	EMP/132/LDP2/01 South of K.P. Thomas & Sons, near Templeton	I	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
	EMP/093/00001 North of Honeyborough Industrial Estate, Neyland	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Bristol Channel SAC; Pembs Bat Sites and Bosh Lakes SAC; Limestone Coast SAC; Yerboston Tops SAC; Castlemartin Coast SPA

	Policy	Category (criteria A-M)	Screening conclusion
9.	<p>GN 10 Mixed-use Housing and Employment Proposals This policy is a two-part policy.</p> <p>Part 1 sets out the circumstances under which a mixed-use site will be permitted.</p> <p>Part 2 identifies two site allocations.</p>	B/I	<p>Part 1</p> <p>Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.</p> <p>For Part 2</p> <p>This policy identifies mixed use allocations which are considered in further detail below.</p>
	MXU/040/01 Old Hakin Road, Haverfordwest	I	Screened in for: Afonydd Cleddau SAC; Pembrokeshire Bat Sites and Bosherton 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 Bosherton 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.
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

	Policy	Category (criteria A-M)	Screening conclusion
			sites.
13	GN 14 Replacement Dwellings in the Countryside	B/I	<del>Screened in: policy listing general criteria and applies Plan wide. Depending on their detail and location proposals may have a likely significant effect where a larger replacement dwelling could result in the release of additional nutrients into the river system.</del> 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	B	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 in 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

	Policy	Category (criteria A-M)	Screening conclusion
	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
	HSG/086/LDP2/2 East of Castle Pill Road 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
	HSG/086/LDP2/4 Former Hakin Infants' School 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;; Skomer Skokholm and the Seas off Pembrokeshire SPA
	HSG/086/LDP2/5 Former Hubberston VC School, Hakin 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/LDP2/6 Former Hakin Junior School 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/LDP2/7 North East of Beaconing, 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
	S/HSG/086/LDP2/3 South of	I	Screened in for:

	Policy	Category (criteria A-M)	Screening conclusion
	Conway Drive, Castle Pill Road, Steynton Milford Haven		Afonydd Cleddau SAC; W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	HSG/095/00144 North of Gibbas Way Pembroke	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Yerboston Tops SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
	HSG/095/LDP2/1 Between St Daniels Hill & Norgans Hill Pembroke	I	Screened in for: 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
	HSG/095/LDP2/2 SW of Southlands, St. Daniels Hill Pembroke	I	Screened in for: 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
	HSG/095/LDP2/4 East of Golden Hill Road Pembroke	I	Screened in for: Bristol Channel SAC; Limestone Coast SAC; Pembs Marine SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
	HSG/095/LDP2/5 South East of Southlands St.Daniels Hill Pembroke	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/096/00238 North of Pembroke Road Pembroke	I	Screened in for: Bristol Channel SAC; W Wales Marine

	Policy	Category (criteria A-M)	Screening conclusion
	Dock		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/096/LDP2/1 Land at Hampshire Drive Pembroke Dock	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA; Skomer Skokholm and the Seas off Pembrokeshire SPA
	HSG/096/LDP2/2 West of Stranraer Road Pembroke Dock	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 ; 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
	S/HSG/034F/LDP2/1 Maesgwynne Fishguard	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
	HSG/093/00066 East of Poppy Drive Neyland	I	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park Narberth	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC ; Bristol Channel SAC; Carmarthen Bay SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carmarthen Bay SPA
	HSG/020/LDP2/1 Land at Tan	I	Screened in for:

	Policy	Category (criteria A-M)	Screening conclusion
	Ffynnon Fields      Cilgerran		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: Afonydd Cleddau SAC; Afon Teifi SAC; Gweunydd Blaencleddau SAC; N Pembs Woodlands SAC; Preseli SAC
	HSG/048/00038      North of Hayston View Johnston	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 Park Kilgetty	I	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Limestone Coast SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
	HSG/052/00011      South 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; Yerboston Tops SAC; Castlemartin Coast SPA ; Skomer, Skokholm and the Seas off Pembrokeshire SPA
	HSG/053/LDP2/1 Between Longstone Court and 62, St. Davids Road Letterston	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
	HSG/063/00024      North of The Kilns Llangwm	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine

	Policy	Category (criteria A-M)	Screening conclusion
			SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC
	HSG/122/00035 Awel y Mor extension St Dogmaels	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; Yerboston 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
	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/029/00014 Opposite 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; Yerboston 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

	Policy	Category (criteria A-M)	Screening conclusion
			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 Jeffreyton	I	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Yerboston 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; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA Afonydd Cleddau SAC ; Limestone Coast SAC
	HSG/113/LDP2/01 South of Robeston Court Robeston Wathen	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC
	HSG/114/LDP/01 East of Pilgrim's Way Roch	I	Screened in for: Afonydd Cleddau SAC; North West Pembrokeshire Commons SAC;W

	Policy	Category (criteria A-M)	Screening conclusion
			Wales Marine SAC; Pembs Marine SAC; St David's SAC; Ramsey and St David's Peninsula Coast SPA
	HSG/119/LDP2/1 Between Cornerways and Austalise Simpson Cross	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; St David's SAC; Ramsey and St David's Pen Coast SPA
	HSG/120/00018 NW of Wesley Way Spittal	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Preseli SAC
	HSG/123/LDP/01 North of Parsons Green St Florence	I	Screened in for: Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Limestone Coast SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
	HSG/132/LDP2/1 West of Kings Park Farm Templeton	I	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA
	HSG/135/LDP2/1 North of Bulford Road Bypass Tiers Cross	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Castlemartin Coast SPA
	HSG/149/LDP2/1 Land at Ford Farm Wolfscastle	I	Screened in for: Afonydd Cleddau SAC; North Pembrokeshire Woodland SAC; Preseli SAC
15	GN 17 Residential Commitments	-	Screened <del>out</del> in: <a href="#"><u>Taking account of the Supreme Court judgment (CG Fry &amp; Son Ltd v SSHCLG [2025] UKSC 35) which confirms that HRA applies to the discharge of planning conditions. All sites are initially screened in prior to planning status being established. There is no requirement to effectively reassess commitments</u></a>

	Policy	Category (criteria A-M)	Screening conclusion
			<del>under the provisions of the 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>20</sup>, in addition to advice published by NRW specifically concerning those situated within SAG P Sensitive Catchments<sup>21</sup>.</del>
	000/01202	Bluebell Lane	
	003/00025	Barley Park Close	
	003/00040	North of New Road	
	007/00047	Old Station Yard	
	011/00011	Hawn Lake	
	012/00004	Land to the S of Kiln Park	
	015/00022	Sageston Fields	
	<a href="#">015/00024</a>	<del>Cornfields Walk</del>	<a href="#">Site Completed</a>
	025/00028	South of Tinker's Fold	
	028/00012	North of the Forge	
	029/00013	Dingle Lane	
	029/00026	Woodholm Farm	
	030/00019	Crug yr Efydd	
	030/00043	Between the school and station road	
	<a href="#">033/00035</a>	<del>South West of Eglwyswrw School</del>	<a href="#">Site Completed</a>
	034/00099	Delfryn, Heol Pentlan, Stop & Call	
	<a href="#">034/00165</a>	<del>West of Clos-Y-Bigney</del>	<a href="#">Site Completed</a>
	034/00165	Maesgwynne Farm Complex	
	034/00292	Main Street	
	035/00021	Poplar Meadow	
	035/00030	Will Meadows	

<sup>20</sup> Part C.12. Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook, April 2021 Edition. UK: DTA Publications Limited.

<sup>21</sup> Advice for the review of LDPs – <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> 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...”

	040/00077	Kensington Garden/Area of land behind City Rd		
	040/00106	Brooklands Park		
	040/00373	Calvary Church		
	040/00397	141 Portfield		
	040/00430	Snooker Club		
	<a href="#">040/00431</a>	<b>Scarrowscant</b>		<a href="#">Site Completed</a>
	040/00445	7 Dew Street		
	042/00013	North of Cartref		
	044/00015	Harcourt Close		
	044/00050	Leven Close		
	044/00063	Cyfin Barn Farm		
	046/00015	Bowett Close		
	048/00017	Pond Bridge Farm		
	050/00043	Land to rear of Newton Hall		
	053/00009	Phase 2, Court Meadow		
	<a href="#">053/00034</a>	<b>Parc Maen Hir</b>		<a href="#">Site Completed</a>
	053/00052	Former Go Cart Track		
	081//LDP/01	Maes Roslyn		
	081/LDP/01	Ger Y Lein Fach		
	085/00022	Parc Yr Odyn		
	086/00129	Beaconing Drive, Steynton		
	<a href="#">086/00223</a>	<b>Thornton Rd</b>		<a href="#">Site Completed</a>
	086/00282	Woodlands View		
	086/00377	Land at Milford Marina		
	086/00378	132 Robert Street		
	086/00381	72-78 Charles Street		
	088/00074	Dingle Farm		
	088/00077	Rushacre Gardens		
	<a href="#">088/00360</a>	<b>Old Narberth CP School</b>		<a href="#">Site Completed</a>
	095/00147	Land adjacent to Long Mains and Monkton Priory		
	095/00180	Green Haven, Monkton		
	095/00240	Springfield		
	096/00230	Hampshire Drive		
	096/00274	Land N of Cleddau Bridge Hotel		
	<a href="#">096/00373</a>	<b>Imble Lane</b>		<a href="#">Site Completed</a>
	096/00375	Land N of Cleddau Bridge Hotel		
	<a href="#">099/00045</a>	<b>Sycamore Close</b>		<a href="#">Site Completed</a>

	110/00015	Maes Elwyn John		
	119/00028	Old Smithy Craft Centre		
	119/00030	Pembrokeshire Motor Museum		
	119/LDP/01	East of Hill Lane		
	123/00045	Ash Grove Gardens		
	125/00009	St Twynnelles Farm		
	131/00021	Land adj Blaenffynnon Farm		
	154/00001	Barnlake Point		
	GN 18	Slade Lane, Haverfordwest		This policy identifies a residential allocation which is screened under GN 16 Allocations.
	GN 19a	Maesgwynne, Fishguard		This policy identifies a residential allocation which is screened under GN 16 Allocations
	GN 19b	South of Conway Drive, Castle Pill Road, Steynton –		This policy identifies a residential allocation which is screened under GN 16 Allocations
	GN 20 – Local Needs Affordable Housing		B	Screened out: policy listing general criteria. <u>Can only be used in conjunction with other policies that allow for development to take place and these have been screened in.</u>
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		Screened in for: Bristol Channel SAC; Carms Bay SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC Yerboston Tops SAC; Pembs Marine SAC;

			Carms Bay SPA
	SSA/089/LDP2/01 East of Park House, Tenby		Screened in for: Bristol Channel SAC; Carmarthen Bay SAC; Limestone Coast SAC; ; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC; Yerboston Tops SAC; Carmarthen Bay SPA
	SSA/135/LDP2/01 North of Bulford Road Bypass, Tiers Cross		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		Screened in for: Afonydd Cleddau SAC; Carms Bay SAC; Pembs Marine SAC;; Yerboston 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.
	<del>GT/095/LDP2/01 Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke (Site deleted)</del>	<del>+</del>	<del>Screened in for: 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</del>
	GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly		Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Limestone Coast SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC;; Carmarthen Bay SPA
	GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site		Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	GT/095/LDP2/02 Adjacent to Monkton Playing Field		Screened in for: Bristol Channel SAC; Limestone Coast SAC; Pembrokeshire Bat Sites and Bosherton 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	B	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	B	Screened out: policy listing criteria for testing the acceptability of proposals.
21.	GN 28 – Protection and Enhancement of the Historic Environment	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 (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.
	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.	<p>GN 36 – Transport Routes and Improvements This policy has two elements.</p> <p>Part 1 provides a criteria-based approach for the evaluation of new transport schemes.</p> <p>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.</p>	B / I	<p>Part 1</p> <p>screened <del>out</del> <u>in</u>: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.</p> <p><u>Reference is made to roadside service areas and to public transport interchanges where non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. 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.'</u></p> <p><del>and it is 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 36 cannot undermine the conservation objectives of any European sites.</del></p> <p>Part 2: Safeguarded routes are screened below.</p>
	TS/LDP2/03 Road & Footpath Well Hill improvement, Pembroke Well	I	Screened in: The site is <1 km from the Pembrokeshire Marine SAC

	Hill — Pembroke		<p>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</p> <p>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</p>
	TS/LDP2/04 Public Transport Interchange Milford Haven public transport interchange Milford Haven Train Station	I	<p>Screened <del>out in</del>: <del>This allocation does not detail the proposal. However, due to the location of development it is unlikely to have a significant effect.</del></p> <p><del>Other policies of the Plan in particular SP12, GN 41 and GN 47 will ensure that development is carried out appropriately.</del></p>
	TS/LDP2/05 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Train Station	I	<p>Screened <del>out in</del>: 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.</p>
	TS/LDP2/08 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Bus Station	I	<p>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.</p> <p>Afonydd Cleddau SAC; Pembrokeshire Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; W Wales Marine</p>
29.	<p>GN 37 – Working of Minerals</p> <p>This policy has two parts.</p> <p>Part 1 sets out the criteria for considering minerals development.</p> <p>Part 2 allocates the site at Trefigin for sand and gravel</p>	BI	<p>Screened <del>out in</del>: <u>Part 1: Although not locationally specific proposal may come forward with the catchment area. Non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the</u></p>

	extraction.		<p><del>case. Screened in as a precautionary. 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.</del></p> <p>Part 2: The site allocation at Trefigin is screened below.</p>
	MN/000/LDP2/001 Trefigin Quarry extension	I	<p>Screened in: allocation may have a likely significant effect on European sites. Issues to consider regarding groundwater.</p> <p>Afon Teifi SAC; North Pembrokeshire Woodlands SAC; Preseli SAC; Cardigan Bay SAC; W Wales Marine SAC; Pembrokeshire Bat Sites and Bosherton Lakes SAC;</p>
30.	GN 38 – Safeguarding and Prior Extraction of the Mineral Resource	B1	<p><del>Screen in: 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. Criterion 2 provides for extraction not having an unacceptable impact on environmental or amenity considerations. However, a typo gives the opposite meaning.</del></p> <p><del>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</del></p>

			<i>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.'</i>
31.	GN 39 – Secondary Aggregates and Recycled Waste Minerals	B/I	<u>Screened in: policy listing general criteria for the acceptability of proposals. Although not locationally a specific proposal may come forward in locations that may cause adverse effects on national statutorily designated sites. Also, non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the case. Screened in. Screened out: policy listing general criteria for the acceptability of proposals.</u>
32.	GN 40 – Buffer Zones around Mineral Sites	A	Screened out as policy does not lead to development.
33.	GN 41 Protection of National Statutory Environmental Designations	M	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
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	<del>B</del>	<p><u>This Policy is proposed for deletion through the Focussed Changes consultation.</u> <del>Screened out: policy lists general criteria applying in defined coastal change management areas which are in proximity to European sites.</del></p> <p><del>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.</del></p> <p><del>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.</del></p>
39.	GN 47 Water Quality and Protection of Water Resources	B/D/E_I	<p><u>Screened In: DTA Handbook includes that <del>Bespoke</del> area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in).</u> F.6.3.12</p> <p><del>Screen out: Policies listing general criteria for testing the acceptability/ sustainability of proposals.</del></p> <p><del>Environmental protection/site safeguarding policy. Policies or proposals which steer change in such a way as to protect European sites from adverse effects.</del></p>
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 <del>Policy deleted.</del>		
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	B/I	<u>Screened in: Policies listing general criteria for testing the acceptability. May include the potential use of more intensive forms of fertilization.</u> <del>Screened out: Policies listing general criteria for testing the acceptability.</del>
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 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	<p>Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.</p> <p>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.</p>
50.	GN 58 Self-Catering Accommodation	B/I	<p>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.</p>
51.	<p>GN 59 – Waste Management Facilities</p> <p>The policy is in two parts.</p> <p>Part 1 lists criteria for the consideration of waste management facilities.</p> <p>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.</p>	B/I	<p>Part 1</p> <p>Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.</p> <p>Part 2</p> <p>Potential sites have been screened below.</p>
	S/EMP/000/00003 Milford Haven petro-chemical	I	<p>Screened in for:</p> <p>Afonydd Cleddau SAC; W Wales</p>

	storage facility (Puma Energy)		Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
	S/EMP/000/00004 Waterston – tank farm and LNG		Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembrokeshire Marine SAC; Limestone Coast SAC; Pembrokeshire Bat Sites and Bosherton Lakes SAC; Castlemartin Coast SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA
	EMP/146/00001 Waterston Industrial Estate		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/095/00001 Pembroke Power Station Site		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;
	S/EMP/096/00005 Kingswood Industrial Estate, Pembroke Dock		Screened in for: Bristol Channel SAC; W Wales Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC; Yerboston Tops SAC; Castlemartin SPA ; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/096/00006 Waterloo and London Road Industrial Estate, Pembroke Dock		Screened in for: Bristol Channel SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Yerboston Tops SAC; Castlemartin SPA; Skomer, Skokholm and the Seas off Pembrokeshire SPA;
	S/EMP/000/00002 Valero Refinery, Rhoscrowther		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
	EMP/034/00006 Celtic Link Business Park, Scleddau		Screened in for: Afonydd Cleddau SAC;
	S/EMP/136/00001 Trecwn		Screened in for:

			Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St David's SAC
	EMP/030/00001 Parc 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

- 4.7. 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 – Screened in For AA

**Table 16 Screening of European Sites Screened in For AA**

Impact Pathway	Affected Designated Site	Screened in for AA
Atmospheric Pollution	Afonydd Cleddau SAC Pembrokeshire Marine SAC	Yes – Major roads were located within 200m of the sites.
	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.
Water Quality	Afonydd Cleddau SAC ( <del>Nutrient Neutrality</del> ) 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, <del>and</del> <del>P</del> phosphates related LSE to the Afon Teifi and Afonydd Cleddau. <u>Nitrogen related LSE to the Milford Haven inner water body of Pembrokeshire Marine SAC.</u>
Recreation	All sites excluding: 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

Impact Pathway	Affected Designated Site	Screened in for AA
		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 Pembrokeshire Bat Sites and Bosherton Lakes SAC Yerbeston Tops SAC	Yes – screened in as under the precautionary principle and potential to infringe on functionally linked habitat and conservation objectives.
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

4.8. 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.

**Table 17 European Sites Screened in for Appropriate Assessment**

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 Bosherton Lakes SAC	Pembrokeshire Marine SAC
North Pembrokeshire Woodlands SAC	Afonydd Cleddau SAC
Skomer Skokholm and Seas off Pembrokeshire SPA	Northwest Pembrokeshire Commons SAC

4.9. The following sites have been screened out due to there being no likely

significant effects:

- Grassholm SPA

**Table 18 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
SP12: Maintaining and Enhancing the Natural Environment	Screened in
<u>SP13: Port and energy-related Development and Celtic Freeport</u>	<u>Screened in</u>
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 <del>Out</del> <u>In</u> 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 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 <del>Out</del> <u>In</u> Part 2 Screened in
S/EMP/000/00002 Pembroke Oil Refinery (Valero)	Screened In

Strategic Policy	Screening Outcome
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

**Table 19 General Policies Screened In**

General Policy	Screening outcome
<a href="#"><u>GN 2 Sustainable Design</u></a>	<a href="#"><u>Screened in</u></a>
<a href="#"><u>GN 3 Infrastructure and New Development</u></a>	<a href="#"><u>Screen in</u></a>
<a href="#"><u>GN 4 Resource Efficiency and Renewable and Low-</u></a>	<a href="#"><u>Screened in</u></a>

General Policy	Screening outcome
<u>carbon Energy Proposals</u>	
<p>GN 5 Renewable Energy – target and allocations The policy consists of 2 parts:</p> <ul style="list-style-type: none"> <li>▪ Part 1: sets out the target per annum for renewable energy generation.</li> <li>▪ Part 2: allocates two sites for solar arrays.</li> </ul>	<p>For Part 1 Screened out</p> <p>For Part 2 The sites are screened below.</p>
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/034/00006 Celtic Link Business Park, near Scleddau	Screened in
EMP/040/LDP2/01 Withybush Showground, Haverfordwest	Screened in
EMP/053/00001 Old 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/093/00001 North of Honeyborough Industrial Estate, Neyland	Screened in
<p>GN 10 Mixed-use Housing and Employment Proposals This policy is a two-part policy.</p> <p>Part 1 sets out the circumstances under which a mixed-use site will be permitted.</p> <p>Part 2 identifies two site allocations.</p>	<p>Part 1 Screened in</p> <p>For Part 2 This policy identifies mixed use allocations which are summarised below.</p>

General Policy	Screening outcome
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:
<u>GN 14 Replacement Dwellings</u>	<u>Screened in</u>
GN 16 – Residential Allocations Sites have been allocated for residential development	This policy identifies residential allocations which are considered in further below.
HSG/040/LDP2/1 Former 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
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/095/00144 North 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

General Policy	Screening outcome
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/093/00066 East 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/048/00038 North 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/052/00011 South 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/063/00024 North of The Kilns Llangwm	Screened in
HSG/122/00035 Awel y Mor extension St Dogmaels	Screened in
HSG/003/LDP2/01 North of Begelly Farm Begelly	Screened in
HSG/006/00003 Adjacent 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/029/00014 Opposite 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

General Policy	Screening outcome
HSG/046/LDP2/1 Land at West End Cottages Hundleton	Screened in
HSG/047/LDP2/1 South of The Crown Jeffreyton	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
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/120/00018 NW 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 19b South 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

General Policy	Screening outcome
SSA/089/01 South west of Park House, Tenby	Screened in
SSA/089/LDP2/01 East of Park House, Tenby	Screened in
SSA/135/LDP2/01 North 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:
GN 30 – Community Facility Allocations	This policy identifies 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	Screened in
GN 31 – Retail and Commercial Centre Development	Screened in
GN 32 – Out-of-Centre Retail and Commercial Development	Screened in:
GN 33 – Farm Diversification	Screened in:
GN 34 – Conversion or Change of Use of Agricultural Buildings	Screened in:
GN 35 – Marinas	Screened in:
<p>GN 36 – Transport Routes and Improvements</p> <p>This policy has two elements.</p> <p>Part 1 provides a criteria-based approach for the evaluation of new transport schemes.</p> <p>Part 2 identifies the main proposals in the Plan area for improvements to the transport network and, wherever</p>	<p>Part 1 screened <b>outin</b>:</p> <p>Part 2: Safeguarded routes are screened</p>

General Policy	Screening outcome
the routes for these are known, to safeguard them from other developments that might compromise their implementation.	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 <del>out</del> in:
TS/LDP2/05 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Train Station	Screened <del>out</del> in:
TS/LDP2/08 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Bus Station	Screen in
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 <del>out</del> in: Part 2: The site allocation at Trefigin is screened below.
MN/000/LDP2/001 Trefigin Quarry extension	Screened in:
<a href="#"><u>GN 38 – Safeguarding and Prior Extraction of the Mineral Resource</u></a>	<a href="#"><u>Screened in</u></a>
<a href="#"><u>GN 39 Secondary Aggregates and Recycled Waste Minerals</u></a>	<a href="#"><u>Screened in</u></a>
GN 41 Protection of National Statutory Environmental Designations	Screened in
<a href="#"><u>GN 47 Water Quality and Protection of Water Resources</u></a>	<a href="#"><u>Screened in</u></a>
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:

General Policy	Screening outcome
<p>GN 59 – Waste Management Facilities</p> <p>The policy is in two parts.</p> <p>Part 1 lists criteria for the consideration of waste management facilities.</p> <p>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.</p>	<p>Part 1 Screened in: Part 2 Potential sites have been screened below.</p>
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/146/00001 Waterston 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
S/EMP/096/00006 Waterloo and London Road Industrial Estate, Pembroke Dock	Screened in
S/EMP/000/00002 Valero Refinery, Rhoscrowther	Screened in
EMP/034/00006 Celtic Link Business Park, Scleddau	Screened in
S/EMP/136/00001 Trecwn	Screened in
EMP/030/00001 Parc Gwynfryn, Crymych	Screened in
GN 60 – Disposal of Waste on Land	Screened in

## 5. HRA Stage 2 Appropriate Assessment

5.1 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 20.

**Table 20 Summary of Stage 1 Screening.**

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 ( <u>Nutrient Neutrality Phosphate</u> ) Pembrokeshire Marine SAC ( <u>Nitrogen</u> ) Carmarthen Bay SAC Carmarthen Bay SPA. Cardigan Bay SAC Afon Teifi SAC ( <u>Phosphate</u> ) Gweunydd Blaencleddau SAC North Pembrokeshire Woodlands SAC	Yes
Recreation	All sites excluding: Grassholm SPA,  Carmarthen Bay Dunes SAC	Yes, all <u>designated</u> sites excluding those listed as exempt due to distance.
Loss of Functionally Linked Land	Afonydd Cleddau SAC Pembrokeshire Marine SAC Limestone Coast SAC Gweunydd Blaencleddau SAC Preseli SAC North Pembrokeshire Woodlands SAC Pembrokeshire Bat Sites and Bosherton Lakes SAC Yerbeston Tops SAC	Yes
Disturbance	Pembrokeshire Marine SAC 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.

## 6. (Appropriate Assessment)

### General Measures

- 5.2 The Screening in Chapter 4 HRA Stage 1 Screening showed that there will be a credible risk of LSE to designated sites via
- non-phosphorous/nitrogen related water quality,
  - loss of functionally linked land and
  - disturbance to terrestrial species.
  - Recreation
  - N/P – Nutrient neutrality Phosphorous
  - Nitrogen
  - Air quality impacts

### Non phosphorous/nitrogen Water quality

- 5.3 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.

### Recommended Mitigation Water Quality (non-phosphorus/nitrogen)

- 5.4 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. Please note (as at January 2026) edits have been proposed through the Focussed Changes consultation to Policy SP 12 and Policy GN 41 to address this issue – see SD14.<sup>22</sup>

### Functionally linked land

- 5.5 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 Local Development Plan Area and Relevant European Site).

<sup>22</sup> [https://www.pembrokeshire.gov.uk/objview.asp?object\\_id=12126&language=](https://www.pembrokeshire.gov.uk/objview.asp?object_id=12126&language=)

## Disturbance during construction

- 5.6 In addition to this, species may be harmed or killed during construction phases of allocations. The current mitigation within the LDP2, *SP\_12 Maintaining and enhancing the Environment* and *GN\_41 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.
- 5.7 Disturbance may occur during construction due to increased personnel and noise during construction phases of the allocations. The current mitigation within the LDP2, *SP\_12 Maintaining and enhancing the Environment* and *GN\_41 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.
- ~~5.8~~ On the basis of the information available within the plan, additional plan specific mitigation or policy caveats may be are required to fully mitigate potential adverse effects resulting from the following Policies and allocations : Aa as they relate to the above impacts on site Conservation Objectives.

### 5.8

**Table 21 Policies and allocations requiring mitigation (Non-Phosphorous/Nutrient) Water Quality & Disturbance during construction**

Strategic Policy
<b>SP2: Housing requirement</b>
<b>SP3: Affordable housing Target</b>
<b>SP4: Gypsy, Traveller and Show-people</b>
<b>SP5: Supporting Prosperity</b>
<b>SP8: Regional Growth Areas</b>
<b>SP9: Narberth Rural Town, Service Centres and Service Villages</b>
<b>SP10: Local Villages</b>
<b>SP11: Countryside</b>
<b>SP12: Maintaining and Enhancing the Natural Environment</b>
<b>SP13: Port and energy-related Development and Celtic Freeport</b>
<b><u>SP14: Strategic Employment Provision</u></b>
<b><u>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 In Part 2: Screened In</u></b>
S/EMP/086/LDP/01 Blackbridge
S/EMP/136/00001 Former RNAD Site, Trecwn
S/EMP/034/LDP/02 Goodwick – Parrog
S/EMP/040/00004 Withybush Cluster (Trading Estate)

Strategic Policy
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
<b>SP15: Safeguarding of Existing Employment Sites</b>
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)
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)
<b>SP16: Retail Hierarchy</b>
<b>SP17: Visitor Economy</b>
<b>SP20: Transport Infrastructure and Accessibility</b>
<del><b>SP21: Waste Prevention and Management</b></del>

**Table 22 Policies and allocations requiring mitigation (Non-Phosphorous/Nutrient) Water Quality & Disturbance during construction**

General Policy
<del><b>GN 2 Sustainable Design</b></del>
<del><b>GN 3 Infrastructure and New Development</b></del>
<del><b>GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals</b></del>
<b>GN 5 Renewable Energy – target and allocations</b>
The policy consists of 2 parts: <ul style="list-style-type: none"> <li>▪ Part 1: sets out the target per annum for renewable energy generation.</li> </ul>

General Policy
<ul style="list-style-type: none"> <li>▪ Part 2: allocates two sites for solar arrays.</li> </ul>
SPV/066/LDP2/01 East of Hazelbank, Llanstadwell
SPV/149/LDP2/01 West of Ford Farm, Wolfscastle
<b>GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)</b>
<b>GN 7 Cawdor Barracks including the former Brawdy Airfield</b>
<b>GN 8 Employment Proposals</b>
<b>GN 9 Employment Allocations</b>
EMP/030/00001 Parc Gwynfryn, Crymych
EMP/034/00006 Celtic Link Business Park, near Sclleddau
EMP/040/LDP2/01 Withybush Cluster, Haverfordwest
EMP/053/00001 Old 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/093/00001 North of Honeyborough Industrial Estate, Neyland
<b>GN 10 Mixed-use Housing and Employment Proposals</b>
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
<b>GN 11 Protection of Employment Sites and Buildings</b>
<b>GN 12 Extensions to Employment Sites</b>
<b>GN 13 Residential Development</b>
<b>GN 14 Replacement Dwelling</b>
<b>GN 16 – Residential Allocations</b> Sites have been allocated for residential development
HSG/040/LDP2/1 Former 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/095/00144 North 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

<b>General Policy</b>	
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/093/00066	East 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/048/00038	North of Hayston View Johnston
HSG/048/LDP2/1	Maes yr Ysgol Johnston
HSG/050/LDP2/1	South of Rock Park Kilgetty
HSG/052/00011	South 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/063/00024	North of The Kilns Llangwm
HSG/122/00035	Awel y Mor extension St Dogmaels
HSG/003/LDP2/01	North of Begelly Farm Begelly
HSG/006/00003	Adjacent to Hafod Blaenffos
HSG/022/LDP2/1	Land at Dungleddy Court Clarboston Road
HSG/152/LDP2/1	South of Bro'r Dderwen Clunderwen
HSG/029/00014	Opposite Woodholm Close Crundale
HSG/029/LDP2/1	West of Ashford Park Crundale
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 Jeffreyton
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/120/00018	NW 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
<b>GN 17 Residential Commitments (subject to planning status)</b>	
000/01202	Bluebell Lane
003/00025	Barley Park Close
003/00040	North of New Road
007/00047	Old Station Yard

011/00011	Hawn Lake
012/00004	Land to the S of Kiln Park
015/00022	Sageston Fields
<del>015/00024</del>	<del>Cornfields Walk</del> ( <a href="#">Site Complete</a> )
025/00028	South of Tinker's Fold
028/00012	North of the Forge
029/00013	Dingle Lane
029/00026	Woodholm Farm
030/00019	Crug yr Efydd
030/00043	Between the school and station road
<del>033/00035</del>	<del>South West of Eglwysrwrw School</del> ( <a href="#">Site Complete</a> )
034/00099	Delfryn, Heol Penlan, Stop & Call
<del>034/00165</del>	<del>West of Clos-Y-Bigney</del> ( <a href="#">Site Complete</a> )
034/00165	Maesgwynne Farm Complex
034/00292	Main Street
035/00021	Poplar Meadow
035/00030	Will Meadows
040/00077	Kensington Garden/Area of land behind City Rd
040/00106	Brooklands Park
040/00373	Calvary Church
040/00397	141 Portfield
040/00430	Snooker Club
<del>040/00431</del>	<del>Scarrowscant</del> ( <a href="#">Site Complete</a> )
040/00445	7 Dew Street
042/00013	North of Cartref
044/00015	Harcourt Close
044/00050	Leven Close
044/00063	Cyfin Barn Farm
046/00015	Bowett Close
048/00017	Pond Bridge Farm
050/00043	Land to rear of Newton Hall
053/00009	Phase 2, Court Meadow
<del>053/00034</del>	<del>Parc Maen Hir</del> ( <a href="#">Site Complete</a> )
053/00052	Former Go Cart Track
081//LDP/01	Maes Roslyn
081/LDP/01	Ger Y Lein Fach
085/00022	Parc Yr Odyn
086/00129	Beaconing Drive, Steynton
<del>086/00223</del>	<del>Thornton Rd</del> ( <a href="#">Site Complete</a> )
086/00282	Woodlands View
086/00377	Land at Milford Marina
086/00378	132 Robert Street
086/00381	72-78 Charles Street
088/00074	Dingle Farm

088/00077	Rushacre Gardens
<del>088/00360</del>	<del>Old Narberth CP School (Site Complete)</del>
095/00147	Land adjacent to Long Mains and Monkton Priory
095/00180	Green Haven, Monkton
095/00240	Springfield
096/00230	Hampshire Drive
096/00274	Land N of Cleddau Bridge Hotel
<del>096/00373</del>	<del>Imble Lane (Site Complete)</del>
096/00375	Land N of Cleddau Bridge Hotel
<del>099/00045</del>	<del>Sycamore Close (Site Complete)</del>
110/00015	Maes Elwyn John
119/00028	Old Smithy Craft Centre
119/00030	Pembrokeshire Motor Museum
119/LDP/01	East of Hill Lane
123/00045	Ash Grove Gardens
125/00009	St Twynnells Farm
131/00021	Land adj Blaenffynnon Farm
154/00001	Barnlake Point
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.	
<b>GN 19b South of Conway Drive, Castle Pill Road, Steynton –</b> This policy identifies a residential allocation which was screened in under Policy GN 16.	
<b>GN 21 – Exception Sites for Local Needs Affordable Housing</b>	
<b>GN 22 – Specialist and Supported Accommodation</b>	
<b>GN 23 – Specialist and Supported Accommodation Allocations</b>	
SSA/089/01 South west of Park House, Tenby	
SSA/089/LDP2/01 East of Park House, Tenby	
SSA/135/LDP2/01 North of Bulford Road Bypass, Tiers Cross	
SSA/088/LDP2/01 Redstone, Narberth	
<b>GN 24 Gypsy and Traveller Site Allocations</b>	
<del>GT/095/LDP2/01 Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke (deleted at Focussed Change stage)</del>	
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	
<b>GN 25 – Gypsy and Traveller Sites and Pitches</b>	
<b>GN 28 – Protection and Enhancement of the Historic Environment</b>	
<b>GN 29 – Community Facilities</b>	
<b>GN 30 – Community Facility Allocations</b>	
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	
<b>GN 31 – Retail and Commercial Centre Development</b>	
<b>GN 32 – Out-of-Centre Retail and Commercial Development</b>	
<b>GN 33 – Farm Diversification</b>	

GN 18 Slade Lane, Haverfordwest This policy identifies a residential allocation which was screened in under Policy GN 16.		
<b>GN 34 – Conversion or Change of Use of Agricultural Buildings</b>		
<b>GN 35 – Marinas</b>		
<b>GN 36 – Transport Routes and Improvements</b>		
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 Bus Station	Haverfordwest public transport
<a href="#">TS/LDP2/04</a>	<a href="#">Public Transport Interchange</a>	<a href="#">Milford Haven public transport</a>
	<a href="#">Milford Haven Train Station</a>	
<a href="#">TS/LDP2/05</a>	<a href="#">Public Transport Interchange</a>	<a href="#">Haverfordwest public transport</a>
	<a href="#">Haverfordwest Train Station</a>	
<b>GN 37 – Working of Minerals</b>		
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		
<b><a href="#">GN 38 – Safeguarding and Prior Extraction of the Mineral Resource</a></b>		
<b><a href="#">GN 39 Secondary Aggregates and Recycled Waste Minerals</a></b>		
<b>GN 41 Protection of National Statutory Environmental Designations</b>		
<b><a href="#">GN 47 Water Quality and Protection of Water Resources</a></b>		
<b><a href="#">GN 53 Community Growing Spaces</a></b>		
<b>GN 54 – Visitor Attractions and Leisure Facilities</b>		
<b>GN 55 – Serviced and Hotel Accommodation</b>		
<b>GN 56 – Caravan, Camping and Chalet Development</b>		
<b>GN 57 – Site Facilities on Existing Caravan and Camping Sites</b>		
<b>GN 58 Self-Catering Accommodation</b>		
<b>GN 59 – Waste Management Facilities</b>		
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/146/00001 Waterston 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/034/00006 Celtic Link Business Park, Sclledau		

GN 18 Slade Lane, Haverfordwest This policy identifies a residential allocation which was screened in under Policy GN 16.
S/EMP/136/00001 Trecwn
EMP/030/00001 Parc Gwynfryn, Crymych
<b>GN 60 – Disposal of Waste on Land</b>

### Recommended Mitigation – Disturbance during construction

- 5.9 To mitigate the **above** policies **and proposals of the Plan which permit development**, the wording of SP\_12 *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.
- 5.10 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.*
- 5.11 Additionally, adverse effects on site integrity will be mitigated by the amendment of the wording in GN 41 *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.
- 5.12 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>23</sup> and the Pollution Control Construction Site Handbook<sup>24</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.

- 5.13 As such, the mitigation above avoids adverse effects on designated sites for the aforementioned impact pathways. Please note (as at January 2026) edits have been proposed through the Deposit Local Development Plan and the Focussed Changes consultation to Policies SP 12 and Policy GN 41 to address these issue– see [SD14](#).

## Recreation

- 5.14 The following European sites have been screened in due to the residential allocations-allocation or commitment being located within 7km of the site (Table 23). Where a residential allocation or commitments 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>25</sup>. A full list of allocations and commitments screened in for recreation can be found in Appendix C. These may give rise to additional recreational use / pressure on the listed sites.

**Table 23 Designated Sites screened in for recreational LSE**

Designated Site	Total Allocations (including all commitments)	Total Number of units	Population Increase
Bristol Channel Approaches SAC	<u>27</u>	<u>710</u>	<u>1704</u>
West Wales Marine SAC	<u>23</u>	<u>647</u>	<u>1553</u>
Afon Teifi SAC	9	<u>173</u>	<u>415</u>
Afonydd Cleddau SAC	<u>61</u>	<u>1719</u>	<u>4126</u>
Carmarthen Bay SAC	<u>11</u>	<u>184</u>	<u>442</u>
Pembrokeshire Marine	<u>85</u>	<u>2580</u>	<u>6192</u>
Cardigan Bay	2	78	187
Gweunydd Blaencleddau	<u>9</u>	<u>123</u>	<u>295</u>
Limestone Coast SAC	<u>32</u>	<u>1083</u>	<u>2599</u>

23 ABPmer, (2020). *Mitigation and Compensation Opportunity in Marine Consenting*, ABPmer Report No. R.3385. A report produced by ABPmer for Welsh Government, March 2020.

24 Shared Regulatory Services Wales (2018) *Pollution Control Construction Site Handbook*. [SRS PollutionControlHandbook ConstructionA4 E](#)

25 *Household and resident characteristics, England and Wales - Office for National Statistics (ons.gov.uk)*

Designated Site	Total Allocations (including all commitments)	Total Number of units	Population Increase
North Pembrokeshire Woodlands SAC	<u>10</u>	<u>343</u>	<u>823</u>
<u>North West</u> Pembrokeshire Commons SAC	1	<u>23</u>	<u>55</u>
Preseli SAC	<u>412</u>	<u>177</u>	<u>425</u>
St David's SAC	<u>2</u>	<u>358</u>	<u>859</u>
Yerbeston Tops SAC	<u>12</u>	<u>315</u>	<u>756</u>
Pembrokeshire Bat Sites and Bosherton Lakes SAC	<u>42</u>	<u>1028</u>	<u>2467</u>
Ramsey and St David's Peninsula SPA	<u>7</u>	<u>145</u>	<u>348</u>
Castlemartin Coast SPA	<u>26</u>	<u>1011</u>	<u>2426</u>
Carmarthen Bay SPA	<u>11</u>	<u>184</u>	<u>442</u>
Skomer, Skokholm and the Seas off Pembrokeshire SPA	13	<u>483</u>	<u>1159</u>

## Marine<sup>26</sup>

- 5.15 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.

<sup>26</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

- 5.16 The condition assessment for Pembrokeshire Marine SAC<sup>27</sup> and Cardigan Bay SAC<sup>28</sup> have identified that the grey seal component of the SAC is in favourable condition with a growing population. The seals that 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.
- 5.17 Cardigan Bay SAC and Pembrokeshire Marine SAC have a website<sup>29,30</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.
- 5.18 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>31</sup> and the Pembrokeshire Marine Code<sup>32</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/>).
- 5.19 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>33</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/>).
- 5.20 Skomer, Skokholm and the Seas off Pembrokeshire SPA: Visits to Skomer

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27 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

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

29 Cardigan-Bay-Marine-Code.pdf (cardiganbaysac.org.uk)

30 Home | Pembrokeshire Marine Special Area of Conservation (pembrokeshiremarinesac.org.uk)

31 [Cardigan-Bay-Marine-Code-ENG.pdf \(wildseas.wales\)](#)

32 [Pembrokeshire Marine Code | The Codes](#)

33 [Protection Zones for seagrass and maerl beds \(pembrokeshiremarinesac.org.uk\)](#)

island via the Skomer boat are booked via the Wildlife Trust of South and West Wales who manage visitor numbers to the island.

- 5.21 Recreational net fishing in Wales occurs at a very low density and has been shown to have little to no bycatch.
- 5.22 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.

## Terrestrial

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

**Table 24 Appropriate Assessment for recreational impacts at terrestrial European Sites.**

European Site	Mitigation
St David's SAC	<p>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>34</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.</p> <p>The SAC is located within the Pembrokeshire National Park. Policy E2/G of the Pembrokeshire Coast National Park Partnership Plan 2025-2029<sup>35</sup> states '<i>Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.</i>' Policy W1/C) advises '<i>Manage recreational pressures and site and community capacity</i> 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.</p> <p>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.</p> <p>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.</p>
Ramsey and St. David Peninsula Coast SPA	<p>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.</p>

<sup>34</sup> Visiting Pembrokeshire with your dog | National Trust

<sup>35</sup> <https://www.pembrokeshirecoast.wales/wp-content/uploads/2025/03/1-Partnership-Plan.pdf>

European Site	Mitigation
	<p>David's<sup>36</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.</p> <p>The SAC is located within the Pembrokeshire National Park. Policy E2/G of the Pembrokeshire Coast National Park Management Partnership Plan 2025-2029 states '<i>Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.</i>' Policy W1/C advises '<i>Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.</i>' Policy W1/G advises <i>Manage the Milford Haven Waterway in line with recreation management objectives and relevant byelaws.</i> This work is done by the National Park Authority often in conjunction with various partnerships.</p> <p>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.</p> <p>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.</p>
Yerbeston Tops SAC	<p>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</p> <p>Policy W1/C advises '<i>Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.</i>'</p> <p>GN 51 <i>Protection and Creation of Outdoor Recreation Areas</i>, GN 52 <i>Protection of Open Spaces with Amenity Value</i>, and GN45 <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.</p> <p>Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact</p>

European Site	Mitigation
Castlemartin coast SPA	<p>on site Conservation Objectives has been identified.</p> <p>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 '<i>Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.</i>' Policy W1/C advises '<i>Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.</i>'</p> <p>GN 51 <i>Protection and Creation of Outdoor Recreation Areas</i>, GN 52 <i>Protection of Open Spaces with Amenity Value</i>, and GN45 <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.</p> <p>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.</p>
Pembrokeshire Bat Sites and Bosherton Lakes SAC	<p>Recreational use is known to erode the banks as well as increase litter and fishing line at Bosherton Lakes (Stock Pool SSSI). Bosherton 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.</p> <p>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 '<i>Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.</i>' Policy W1/C advises '<i>Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.</i>'</p> <p>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. <b>Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact on site Conservation Objectives has been</b></p>

European Site	Mitigation
	<b>identified.</b>
North Pembrokeshire Woodlands SAC	<p>Pengelli SSSI has walking trails and is managed by the Wildlife Trust of South &amp; 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 '<i>Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.</i>'</p> <p>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.</p> <p>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.</p> <p>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.</p>
Preseli SAC	<p>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 Park. Additionally, there are sufficient recreational opportunities within the National Park and local area such that recreation will not become localised at the site.</p> <p>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.</p> <p>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.</p> <p>Following consideration of the mitigation measures to prevent adverse effect on the sites no credible risk of impact</p>

European Site	Mitigation
	on site Conservation Objectives has been identified.
Gweunydd Blaencleddau SAC	<p>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 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.</p> <p>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.</p>
Afon Teifi SAC	<p>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 <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.</p> <p>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 '<i>Manage recreational disturbance to wildlife e.g. through codes of conduct, restrictions, awareness raising and legal enforcement.</i>' Policy W1/C advises '<i>Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.</i>'</p> <p>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.</p>
Limestone Coast SAC	<p>Recreational disturbance to horseshoe bats submerged or partially submerged sea caves and caves not open to the public is limited as access has been blocked to the public or is naturally inaccessible. The Pembrokeshire Coast Path is located near the site and will reduce footfall on the sensitive grassland habitats and species. There is thought to be sufficient recreational space and paths along the coast that will reduce the concentration of recreational users at the site. Policy E2/G of the Pembrokeshire Coast National Park Management Partnership Plan 2025-2029 states '<i>Manage recreational disturbance to wildlife e.g. through codes of</i></p>

European Site	Mitigation
	<p><i>conduct, restrictions, awareness raising and legal enforcement.</i> Policy W1/C advises <i>'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.</i> 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.</p> <p>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.</p>
Afonydd Cleddau SAC	<p>There is sufficient amenity greenspace, footpaths, and allocated recreational areas within 7km of 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.</p> <p>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.</p>
Northwest Pembrokeshire Commons SAC	<p>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 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. Policy W1/C advises <i>'Manage recreational pressures and site and community capacity issues e.g. those arising from unauthorised camping or congestion.</i> <b>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.</b></p>
Skomer, Skokholm and the Seas off Pembrokeshire SPA	<p>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.</p>

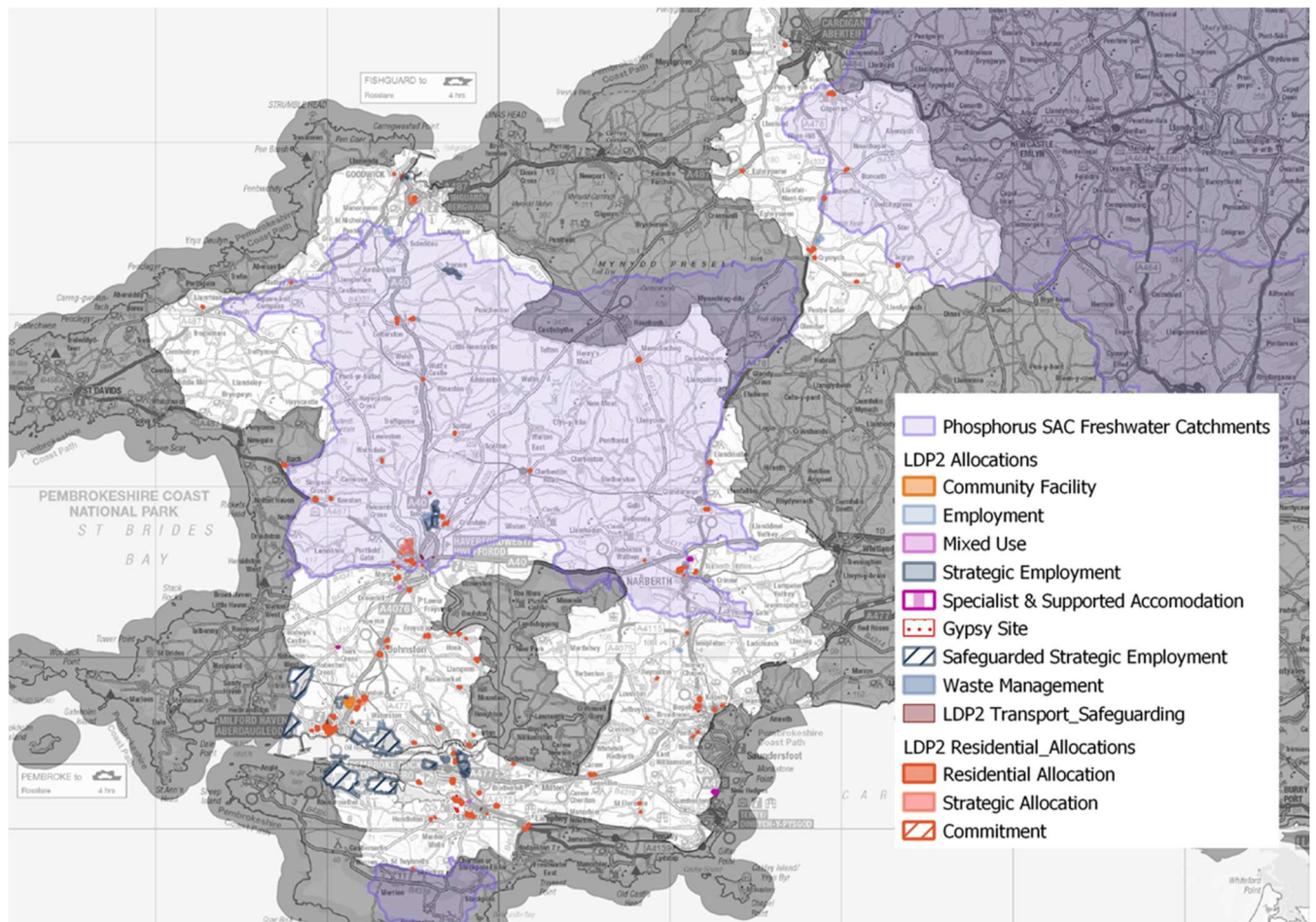
5.24 Given all of the existing management measures to reduce the effect of recreation there will be no adverse effect to the integrity of the sites, in view of the conservation objectives for each site, from the increased population within 7km of these sites.

**Water Quality: Nutrient Neutrality\_ - Phosphorous**

5.25 **New:** Nutrient related water quality impacts within the Afonydd Cleddau SAC and Afon Teifi SAC were found to lead to adverse effects on these European sites. In terms of geographical extent, the map below shows the extent of the affected area.<sup>37</sup>

5.26 Phosphate targets have been substantially tightened and the report in the link below identifies where data on phosphorous concentrations shows that the Afonydd Cleddau and Afon Teifi failing to meet the new targets.

**New Figure 4 Cleddau and Teifi Catchments affected by Phosphorous**



5.27 **New:** Screening regarding phosphates of the LDPs introductory chapters etc., strategic and general policies can be found in Stage 1 HRA Screening. Introductory chapters were screened out.

5.28 **New:** See Appendix C.1 the full list of sites located in the catchments and their

<sup>37</sup> <https://naturalresourceswales.gov.uk/evidence-and-data/research-and-reports/water-reports/water-quality/compliance-assessment-of-welsh-river-sacs-against-phosphorus-targets/?lang=en>

screening conclusions. The table below provides a count of policies and site allocations screened in and out.

**New Table 25 Policies/Allocation/Commitment Policies Screened in for Phosphates**

Plan Reference	Policy	Screen In	Screen Out	Total
Introductory Section and Chapter 1 Context and Key Issues	See across	None	All	–
Strategic Policies (excludes sites screened below)	See across	15	6	21
General Policies ( excludes sites screened below)	See across	35	15	50
Residential Allocations - count of sites	GN 16	17	38	55
Residential Commitments - count of sites	GN 17	6	60	66
Other Allocations (Policy GN 05, GN 09, GN 10, GN 23, GN 24, GN 30, GN 59, SP 14, SP 15) - count of sites	See across	14	32	46
Transport	GN 36	1	3	4
Totals		88	154	242

Paragraphs 26, 27 and the first part of paragraph 28 of the Focussed Changes HRA have been deleted.

5.29 **New**: The tables below list the screened in sites.

**New Table 26 Policy GN 16 Residential Allocations in the Cleddau and Teifi Catchments**

LDP2 Reference	Site Name	Settlement	Discharges to SAC
HSG/006/00003	Adjacent to Hafod	Blaenffos	West Wales Marine (Nyfer)
HSG/020/LDP2/1	Land at Tan Ffynnon Fields	Cilgerran	Cardigan Bay (Teifi )(Also West Wales Marine)
HSG/022/LDP2/1	Land at Dungleddy Court	Clarboston Road	Freshwater Cleddau
HSG/152/LDP2/1	South of Bro'r Dderwen	Clunderwen	Freshwater Cleddau
HSG/029/00014	Opposite Woodholm Close	Crundale	Freshwater Cleddau - surface water screen in - sewage drains to Merlins Bridge
HSG/029/LDP2/1	West of Ashford Park	Crundale	Freshwater Cleddau - surface water screen in - sewage drains to Merlins Bridge
HSG/040/LDP2/1	Former Education Centre, Dew Street	Haverfordwest	Freshwater Cleddau - surface water screen in - sewage drains to Merlins Bridge
S/HSG/040/LDP2/6	Slade Lane	Haverfordwest	Freshwater Cleddau - surface water screen in - sewage drains to Merlins Bridge
HSG/049/LDP2/1	East of Brookfield Close	Keeston	Freshwater Cleddau
HSG/053/LDP2/1	Between Longstone Court and 62, St. Davids Road	Letterston	Freshwater Cleddau

LDP2 Reference	Site Name	Settlement	Discharges to SAC
HSG/060/LDP2/1	Adjacent to Maesybryn	Llandissilio	Pembrokeshire Marine inner - (via riverine Cleddau) Sewage only
HSG/081/LDP2/1	West of Globe Inn	Maenclochog	Freshwater Cleddau
HSG/088/LDP2/1	West of Bloomfield Gardens and North of Adams Drive & Highfield Park	Narberth	Freshwater Cleddau - surface water screen in - sewage outfall Canaston Bridge - Marine SAC
HSG/113/LDP2/01	South of Robeston Court	Robeston Wathen	Freshwater Cleddau - and to note that there is no water company WwTW in this settlement.
HSG/119/LDP2/1	Between Cornerways and Austalise	Simpson Cross	Freshwater Cleddau
HSG/120/00018	North West of Wesley Way	Spittal	Freshwater Cleddau
HSG/149/LDP2/1	Land at Ford Farm	Wolfscastle	Pembrokeshire Marine - (via riverine Cleddau)

**New Table 27 Policy GN 17 Residential Commitments Screening In**

	Site Name	Site Reference	Settlement	Units Screened In
1.	Old Station Yard	007/00047	Boncath	20
2.	Dingle Lane	029/00013	Crundale	1
3.	Woodholm Farm	029/00026	Crundale	3
4.	Calvary Church	040/00373	Haverfordwest	8
5.	Maes Roslyn	081//LDP/01	Maenclochog	4
6.	Rushacre Gardens	088/00077	Narberth	1

**New Table 28 Other Allocations Screening (Policy GN 05, GN 09, GN 10, GN 23, GN 24, GN 30, GN 59, SP 14, SP 15)**

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
GN 05	SPV/149/LDP2/01	Solar Array	Ford Farm, Wolfscastle	Wolfscastle	Freshwater Cleddau	Screened in as a precautionary
GN 09	EMP/040/LDP2/01	Employment	Withybush Showground	Crundale/ Haverfordwest	Freshwater Cleddau - surface water screen in - sewage drains to Merlins Bridge - Marine SAC	Site will need service extensions to connect into existing public sewerage systems - drains to Marine SAC . NRW are requiring this at Withybush. Screen in for surface water
GN 09	EMP/053/00001	Employment	Old Station Yard, Letterston	Letterston	Freshwater Cleddau	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
GN 09	EMP/088/LDP/01	Employment	Rushacre Enterprise Park Extension Narberth	Narberth	Freshwater Cleddau surface water-sewerage systems drains to Marine SAC	
GN 09	EMP/034/00006	Employment	Celtic Link Business Park, Scleddau	Scleddau	No public sewerage. Crosses watershed - Either West Wales Marine via Goodwick Brook or riverine Cleddau SAC)	No public sewerage. Crosses watershed.
GN 23	SSA/088/LDP2/01	Supported Accommodation	Redstone, Narberth	Narberth	Freshwater Cleddau (Cleddau) - Sewage drains to Marine SAC - screen in for surface water	
GN 24	GT/040/LDP2/01	Gypsy Site	East of Withybush Gypsy and Traveller site	Crundale/Haverfordwest	Freshwater Cleddau	
SP 14	S/EMP/040/00001	Strategic Employment	Withybush cluster (West Estate)	Crundale/Haverfordwest	Freshwater Cleddau - surface water screen in. Sewage drains to Merlins Bridge - Marine SAC	Site will need service extensions to connect into existing public sewerage systems - drains to Marine SAC . NRW are requiring this at Withybush. Screen in for surface water
SP 14	S/EMP/040/00004	Strategic Employment	Withybush cluster (Trading Estate)	Crundale/Haverfordwest	Freshwater Cleddau - surface water screen in. Sewage drains to Merlins Bridge - Marine SAC	Site will need service extensions to connect into existing public sewerage systems - drains to Marine SAC . NRW are requiring this at Withybush. Screen in for surface water

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
SP 14	S/EMP/040/00005	Strategic Employment	Withybush cluster (East of Lodge Estate)	Crundale/Haverfordwest	Freshwater Cleddau - surface water screen in. Sewage drains to Merlins Bridge - Marine SAC	Site will need service extensions to connect into existing public sewerage systems - drains to Marine SAC . NRW are requiring this at Withybush. Screen in for surface water
SP 14	S/EMP/136/00001	Strategic Employment	Former RNAD Site, Trecwn	Letterston	Freshwater Cleddau -	The current WwTW in this area is unlikely to have capacity to serve any redevelopment of any significant scale on this site – a new (private) WwTW would therefore be needed.
SP 15	S/EMP/040/00011	Safeguarded Strategic Employment	Withybush cluster (East Estate)	Crundale/Haverfordwest	Freshwater Cleddau - surface water screen in. Sewage drains to Merlins Bridge - Marine SAC)	Site will need service extensions to connect into existing public sewerage systems - drains to Marine SAC . NRW are requiring this at Withybush. Screen in for surface water
SP 15	S/EMP/040/00012	Safeguarded Strategic Employment	Withybush cluster (North Estate)	Crundale/Haverfordwest	Freshwater Cleddau - surface water screen in. Sewage drains to Merlins Bridge - Marine SAC	Site will need service extensions to connect into existing public sewerage systems - drains to Marine SAC . NRW are requiring this at Withybush. Screen in for surface water
SP 15	S/EMP/040/00015	Safeguarded Strategic Employment	Withybush cluster (Lodge Estate)	Crundale/Haverfordwest	Freshwater Cleddau - surface water screen in. Sewage drains to Merlins Bridge - Marine SAC	Site will need service extensions to connect into existing public sewerage systems - drains to Marine SAC . NRW are requiring this at Withybush. Screen in for surface

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
						water

**New Table 29 Policy GN 36 Transport Routes Screening**

Reference	Scheme Name	Location	Notes	Screen In
TS/LDP2/05	Haverfordwest public transport interchange	Haverfordwest Train Station	Within the catchment area	Yes

## **New** Evolution of approach

- 5.30 To mitigate the increase in Total Phosphorous (TP) to the Cleddau catchments, 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. Dwr Cymru has also confirmed capacity for residential commitments identified in the Local Development Plan. 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).~~
- 5.31 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.
- 5.32 Following liaison with representatives of DCWW, it has been established that at the time of writing (Deposit Local Development Plan 2) 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.**

Paragraph 31, 32, Table 5.3. paragraph 33 and Table 5.4, paragraph 34, 35, and Table 5.5 from the Focussed Changes HRA have been deleted.

- 5.33 **New:** The Deposit/Submission Plan HRA relied on the ‘fair share’ approach identified in NRW’s ‘Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation’, which indicates that a conclusion of no likely significant effect (LSE) could be drawn for allocations where there is capacity to treat the likely additional wastewater within environmental permit limits.
- 5.34 **New:** However, the Welsh Government’s Interim Planning Policy Statement on Development in SAC Rivers [etc] (IPPS) (5 August 2025) indicates that a fair share approach can be relied upon by local planning authorities and developers where it can be demonstrated that actions by public bodies and statutory agencies to reduce nutrient loading to SAC catchments are being taken [our emphasis]. This is an inherent component of Article 6(2) of the Habitats Directive, which requires Member States to take ‘appropriate steps’ to avoid the deterioration of SACs.
- 5.35 **New:** The Review of Permits applies a ‘fair share’ approach whereby improvements to permitted sources are proportionate to their contribution to overall loading. The fair share approach aligns with the polluter pays principle to ensure that burdens placed on different sectors are fair. The underlying assumption is that, in addition to the planned permit improvements, other action to deliver necessary (proportionate) reductions from other sectors will also be delivered. Under a fair share approach, the achievement of the conservation objectives can therefore be dependent upon the improvements being delivered through Review of Permits and the timely delivery of other action to secure necessary reductions from other sectors.
- 5.36 **New:** The IPPS sets out what is needed for a decision-maker to be satisfied that the appropriate steps are ‘secure’. To paraphrase, these are that:
- The scale of further improvements necessary to avoid deterioration from existing/ongoing activities has been estimated,
  - The appropriate steps to be taken have been clearly identified and associated with an appropriate delivery mechanism, and
  - There is a clear timeframe for implementing the appropriate steps.
- 5.37 **New:** In terms of the proposals coming forward under Local Development Plan 2 the following tables provides an estimate of phosphorus loading where such a calculation was feasible (i.e. for housing allocations and for residential commitments). Given that the implications of wastewater treatment for non-housing sites are uncertain non-housing sites will need to be considered on a case-by-case basis in terms of likely implications.

**New** Table 30 Phosphorous Loadings from Housing Allocations in the Catchments in KGs

LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Cumulative 2025-26	Cumulative 2026-27	Cumulative 2027-28	Cumulative 2028-29	Cumulative 2029-30	Cumulative 2030-31	Cumulative 2031-32	Cumulative 2032-2033	Cumulative 2033
HSG/022/L DP2/1	Land at Dungleddy Court	Clarboston Road	19	0.00	0.00	4.28	9.26	13.54	5.77	5.77	5.77	5.77
HSG/152/L DP2/1	South of Bro'r Dderwen	Clunderwen	37	0.00	0.00	0.00	2.57	5.51	6.43	8.66	8.66	8.66
HSG/029/00014	Opposite Woodholm Close	Crundale	15	0.00	0.00	0.58	1.17	1.75	1.75	1.75	1.75	1.75
HSG/029/L DP2/1	West of Ashford Park	Crundale	22	0.00	0.00	1.26	2.93	4.61	4.61	4.61	4.61	4.61
HSG/040/L DP2/1	Former Library Dew Street	Haverford west	22	0.00	0.00	0.00	0.84	0.84	0.84	0.84	0.84	0.84
S/HSG/040/LDP2/6	Slade Lane*	Haverford west	372	0.00	0.00	17.10	34.19	46.78	56.51	64.82	76.70	88.33
HSG/049/L DP2/1	East of Brookfield Close	Keeston	27	0.00	0.00	1.93	5.79	9.64	4.92	6.32	6.32	6.32
HSG/053/L DP2/1	Between Longstone Court and 62, Station Road	Letterston	38	0.00	0.00	0.00	0.00	3.37	7.58	11.79	16.00	16.00
HSG/060/L DP2/1	Adjacent to Maesybryn	Llandissilio	26	0.00	0.00	0.00	0.00	0.00	0.15	0.35	0.56	0.76
HSG/081/L DP2/1	West of Globe Inn	Maenclochog	15	0.00	2.96	5.92	8.88	8.88	8.88	8.88	8.88	8.88
HSG/088/L DP2/1	North of Highfield Park & Parc Roberts	Narberth	89	0.00	1.78	5.03	8.27	11.52	14.44	14.44	14.44	14.44
HSG/113/L DP2/1	South of Robeston Court	Robeston Wathen	5	0.00	0.00	2.58	6.44	6.44	6.44	6.44	6.44	6.44

HSG/119/L DP2/1	Land between Cornerways and Austalise	Simpson Cross	18	0.00	0.00	2.80	5.60	8.39	4.65	5.23	5.23	5.23
HSG/120/00018	NW of Wesley Way	Spittal	10	0.00	0.63	1.25	1.88	2.50	3.13	3.13	3.13	3.13
HSG/149/L DP2/1	Land at Ford Farm	Wolfscastle	14	0.00	0.00	0.00	0.00	1.59	3.18	4.77	5.56	5.56
<b>Cumulative load per year</b>				<b>0.00</b>	<b>5.37</b>	<b>42.72</b>	<b>87.82</b>	<b>125.36</b>	<b>129.26</b>	<b>147.79</b>	<b>164.88</b>	<b>176.72</b>

LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Cumulative 2025-26	Cumulative 2026-27	Cumulative 2027-28	Cumulative 2028-29	Cumulative 2029-30	Cumulative 2030-31	Cumulative 2031-32	Cumulative 2032-2033	Cumulative 2033
HSG/006/00003	Adjacent to Hafod	Blaenffos	6	0.00	1.55	3.10	3.10	3.10	3.10	3.10	3.10	3.10
HSG/020/L DP2/1	Land at Tan Ffynnon Fields	Cilgerran	50	0.00	0.00	0.00	6.75	13.50	20.24	26.99	33.74	33.74
<b>Cumulative load per year</b>				<b>0.00</b>	<b>1.55</b>	<b>3.10</b>	<b>9.85</b>	<b>16.60</b>	<b>23.34</b>	<b>30.09</b>	<b>36.84</b>	<b>36.84</b>

\*Slade Lane Phase 1 discounted from figures. Screened out as all pre-commencement conditions discharged/approved for this phase.

**New** Table 31 Phosphorous Loading Sites with planning permission for housing in KGs

Development Monitoring Reference	Site Name	Settlement	Development proposal (number of additional units):	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Phosphate load +20% buffer (surface water inc)
040/00373	Calvary Church	Haverfordwest	8	0.1	0.1	0	0	0	0	0	0	0	0.2
088/00077	Rushacre Gardens	Narberth	1	0	7.1	0	0	0	0	0	0	0	7.1
007/00047	Old Station Yard	Boncath	20	5.62	5.62	4.8	0	0	0	0	0	0	16.07
029/00013	Dingle Lane	Crundale	1	0	0.76	0	0	0	0	0	0	0	0.76
029/00026	Woodholm Farm	Crundale	3	0	0	0	0	0.24	0.47	0	0	0	0.71
081/LDP/01	Maes Roslyn	Maenclochog	4	1.92	0	0	0	0	0	0	0	0	1.92
<b>Additional load per year</b>				<b>7.64</b>	<b>13.58</b>	<b>4.82</b>	<b>0.00</b>	<b>0.24</b>	<b>0.47</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	
<b>Cumulative load per year</b>				<b>7.64</b>	<b>21.23</b>	<b>26.05</b>	<b>26.05</b>	<b>26.29</b>	<b>26.76</b>	<b>26.76</b>	<b>26.76</b>	<b>26.76</b>	

5.38 **New** The nutrient budget calculator using the windfall dwellings affected total (304 dwellings) with an average estimate of 23 dwellings per hectare figures to calculate a land area (13.22 Ha) results in an estimated 180.34 kg TP/year without SUDS or 159.30 kg TPyear with 51% SuDS<sup>38</sup>.

**New Table 32 Phosphorous Affected Windfall Sites**

	Number of housing units	Potentially affected by Phosphate Issues	% Affected
Large Windfall (Urban)	226	89	39%
Large Windfall (Non-Urban)	95	33	35%
Small Windfall in settlements	488	153	31%
Small Windfall in countryside	61	29	48%
		304	dwellings
	23 dph	13.22	Ha

5.39 The table below shows the total estimated load from phosphate from housing and Gypsy and Traveller Sites.

**New Table 33 Sum of Phosphate Budget – Housing & Gypsy & Traveller Sites**

	Total in KGs	Total in KGs with SUDS
Windfall	180.34	159.30
Commitments	26.76	18.42
Allocations	176.72	97.11
G+T Sites	7.93	6.69
Total	391.75	281.52

### **New Teifi and Cleddau<sup>39</sup> Nutrient Management Plans**

5.40 **New:** These Plans will be the primary vehicle to co-ordinate and deliver the

<sup>38</sup> In terms of using SuDS to reduce phosphorous in surface water runoff C808 [Use of SuDS to reduce phosphorus in surface water runoff https://epg-ltd.co.uk/wp-content/uploads/2024/03/c808-using-suds-to-reduce-phosphorus-in-surface-water-runoff-psg-1.pdf](https://epg-ltd.co.uk/wp-content/uploads/2024/03/c808-using-suds-to-reduce-phosphorus-in-surface-water-runoff-psg-1.pdf) provides guidance on what forms of SuDS works best – pages 24 to 26. The guidance advises that using three stages for treatment produces the most results and gives examples at 3.3.3 where Train 1: pervious paving discharging into swale discharging into pond gives a mean removal of 51%.... Ponds are seen as the best method for dealing with this pollution.

<sup>39</sup> The NMPs have been prepared by Arcadis and developed with the support of and consultation with the following stakeholders: Natural Resources Wales (NRW), Dŵr Cymru Welsh Water (DCWW), Carmarthenshire County Council (CCC), Ceredigion County Council (CeCC), Pembrokeshire County Council (PCC), Pembrokeshire Coastal Forum (PCF), Pembrokeshire Coast National Park (PCNP), Afonydd Cymru, West Wales Rivers Trust (WWRT), World Wildlife Fund (WWF), NMB Technical Advisory Group (TAG), NMB Stakeholder Group, Achub y Tywi, Save the Teifi, The Cleddau Project, and other interested individuals.

strategic mitigation in the catchment that will be supported by subsequent local action plans for delivery. *'The Nutrient Management Board (NMB) operates on a voluntary basis, drawing on the commitment and expertise of its members to address the complex issue of nutrient management in the region. The success of the NMP relies heavily on collaborative and constructive efforts among various stakeholders, including local authorities, environmental groups, and regulatory bodies.'*<sup>40</sup>

- 5.41 **New:** The Nutrient Management Plans set out a range of measures that are technically feasible and can reasonably be delivered in relation to the policies and allocations within the LDP to avoid adverse effects to site integrity and are achievable in practice.
- 5.42 **New:** To ensure that this can be delivered a joint approach has been undertaken with Carmarthenshire and Ceredigion and in addition to LDP sources, wider environmental P sources have been considered within the Nutrient Management Plan.
- 5.43 **New:** This requires that the Nutrient Management Plans contain two distinct categories of measures.

### Category 1 measures

- 5.44 **New:** Those which allow compliance with the Habitats Regulations and avoid adverse effects from the developments arising from the LDP allocations. The checklist for Category 1 measures includes:
- Measures are effective for the lifetime of the development
  - Measures are achievable and can be maintained
  - The expected nutrient mitigation benefits of such measures are certain and can be quantified
  - The measures are deliverable in line with an agreed timetable ahead of the development occupation
  - Delivery of such measures will not compromise the ability to meet the SAC targets in the future (i.e. will not undermine delivery of other category 2 measures in the catchment)
- 5.45 **New:** The following are the potential key Category 1 measures that will satisfy the above checklist for the inclusion within the Afonydd Cleddau and Teifi NMPs:
- Enhanced wastewater treatment – includes ferric dosing, electrocoagulation, enhanced biological phosphorus removal and algae treatment
  - Constructed wetlands, reedbeds and willow beds
  - Sustainable Urban Drainage Systems (SuDS)
- 5.46 **New:** A full range of Category measures that could be pursued through the planning process are listed in Table C 7 1: Cleddau NMP Phosphorus Removal Interventions Matrix and Table C1 Teifi NMP Phosphorous Removal

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<sup>40</sup> Section 2.1 page 3 Cleddau Nutrient Management Plan March 2025 by Arcadis

## Intervention Matrix.

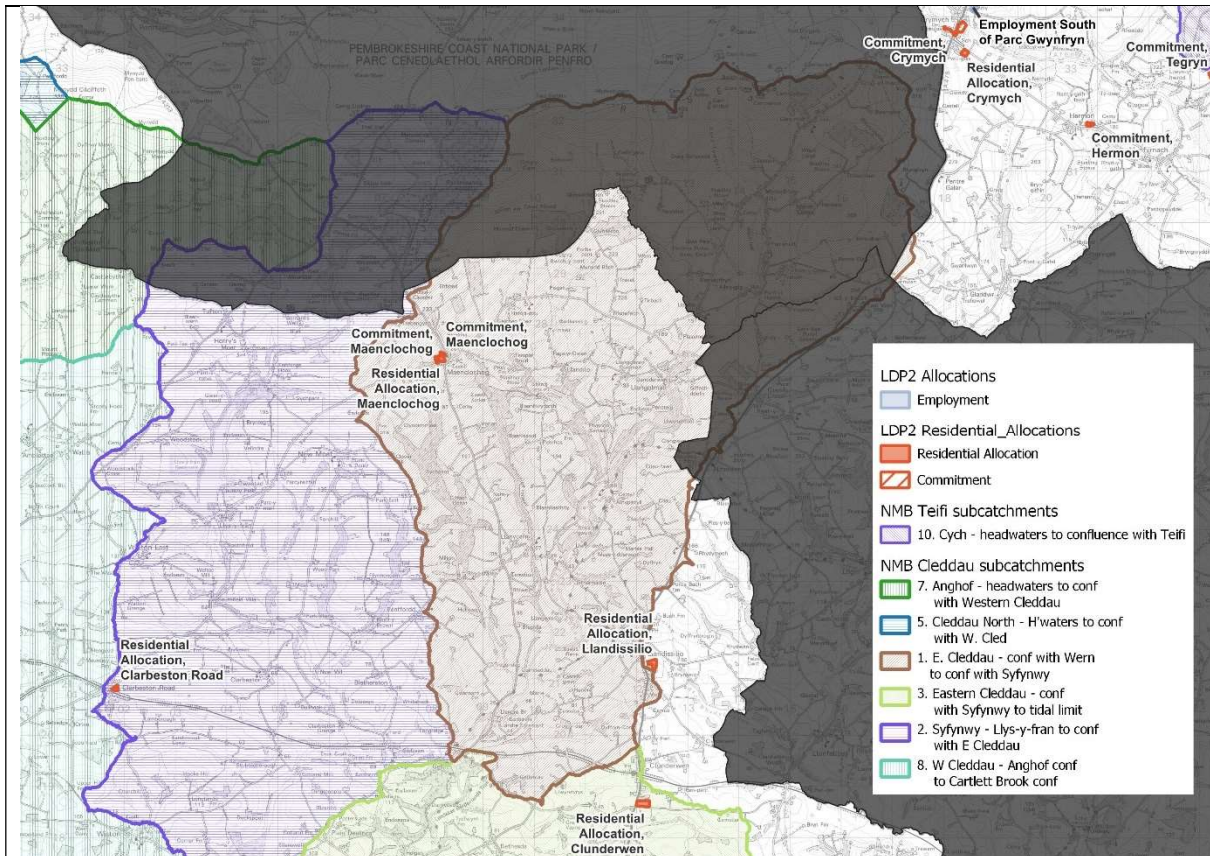
- 5.47 **New:** The Local Development Plan phasing of its housing provision takes account of the currently proposed timescales for waste water treatment. The Plan's policies would need to ensure that appropriate triggers are in place to ensure that delaying development will happen if the milestones for delivery of improvements have not been met – see proposed edits the policies of the Plan to reflect this in Appendix D to this document.

### Category 2 measures

- 5.48 **New:** Those that will deliver wider phosphorus reductions across the catchment to increase certainty of success.
- 5.49 **New:** A range of interventions have been assessed within the Nutrient Management Plan including nature-based solutions that would be entirely within the control of the Council to deliver.
- 5.50 **New:** For purpose of clarification, development cannot be held accountable for achieving the phosphate targets, but it is necessary to ensure that the delivery of mitigation measures which serve to create capacity for new development does not prevent or hinder the delivery of wider measures to achieve the phosphate targets for the SAC.
- 5.51 **New:** Responsibility for securing the delivery of category 1 measures lies with the Council. The delivery of wider category 2 measures will provide the necessary assurances that the delivery of development provided for within the Local Development Plan will not undermine or hinder the achievement of the conservation objectives for the SAC. Delivery of wider category 2 measures is a shared responsibility across statutory bodies. Ultimate responsibility rests with the Welsh Government but NRW Wales have specific powers associated with improving water quality and their role will be central.
- 5.52 **New:** For the Cleddau the Nutrient Management Plan Sections 6.2.1 through to 6.2.8 identifies 8 sub-catchment action plans, including waterfall charts documenting the total availability of mitigation if the various focus areas for mitigation are explored to their fullest. It should be noted that, the practicalities of reaching full potential for these focus areas is another challenge, both in terms of stakeholder support, funding, and land availability. The success of the NMP will be in investigating opportunities within each of the focus areas and sub-catchments to meet the required reductions.
- 5.53 **New:** Each waterfall chart for the Afonydd Cleddau Management Plan does not have the anticipated phosphorous load from the Local Development Plan included. The waterfall charts in Appendix E (taken from the Nutrient Management Plan).
- 5.54 **New:** The tables below provide a summary of conclusions reached in the Afonydd Cleddau Nutrient Management Plan for each sub catchment and identifies the mitigation measures where highlighted that are relevant for Local

Development Plan 2 along with other actions. The tables also include a map of the extent of the sub catchment with the allocations and commitments from the Local Development Plan identified. The phosphate load anticipated from the housing land supply is also provided.

## New Sub-catchment 1 - Afonydd Cleddau



Paragraph 6.2.1 of the Nutrient Management Plan advises *In summary, based on current information, Sub-catchment 1 does not require immediate or urgent action to address P compliance. However, measures could still prove valuable in securing the long-term health of the Cleddau, and efforts in this upstream sub-catchment may offer benefits to downstream sub-catchments.*

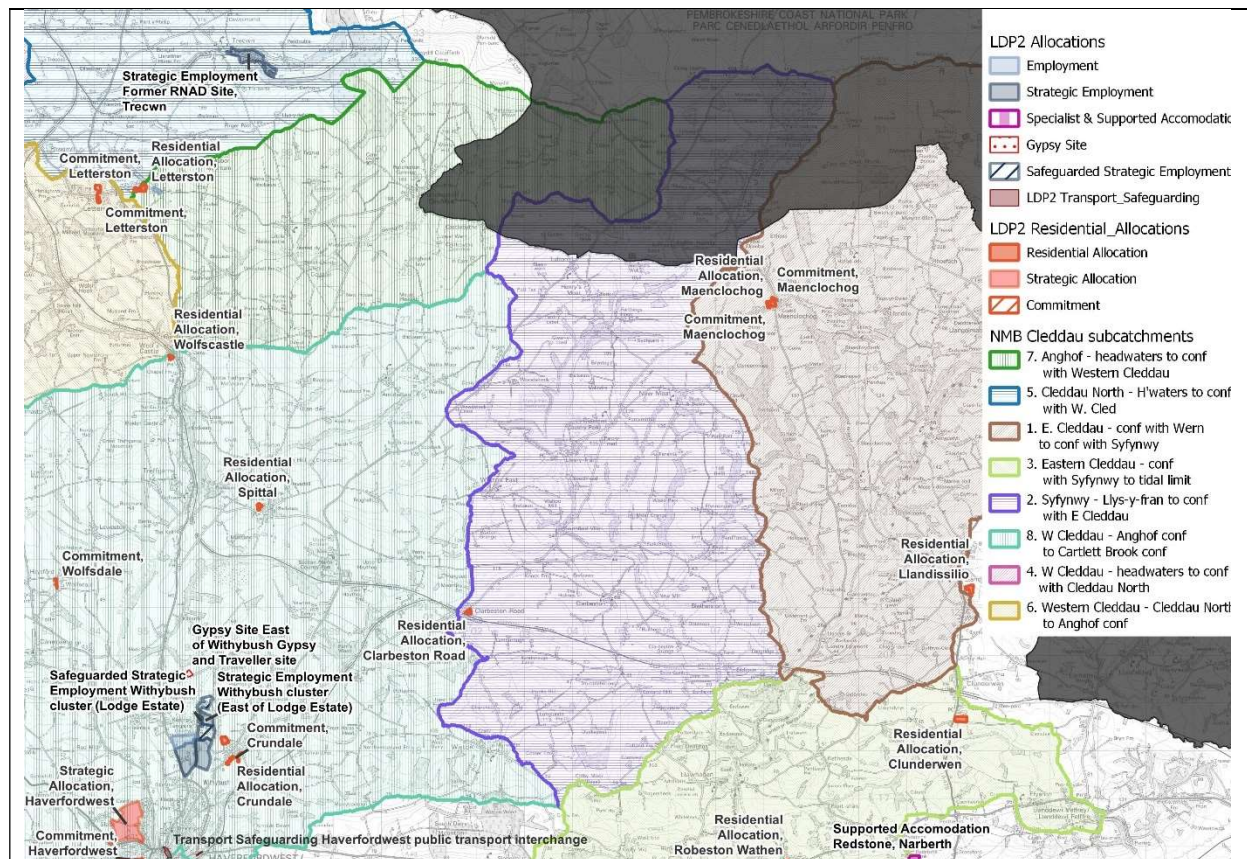
In terms of Generic Actions in the catchment the Nutrient Management Plan advises: • *Local Development Plans (LDP): The impact of the LDP is currently unknown, this should be confirmed with the council, i.e., are there developments planned in this catchment, what impact could they have and what Category 1 measures would be required to offset.*

Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – (tonnes per year in brackets)

Housing Allocations HSG/081/LDP2/1 West of Globe Inn Maenclochog	(0.009)	Housing Commitments	(0.002)	Windfalls	(0.015)
Sewage discharge & Surface water discharge HSG/081/LDP2/1 West of Globe Inn Maenclochog 081/LDP/01 Maes Roslyn	Sewage Discharge Only  None		Surface Only  None		
<b>WwTW Name:</b>	Maenclochog				
<b>Settlement:</b>	Service Village				
<b>WwTW with allocation/ commitment</b>	Yes				
<b>Permit Number</b>	BG0000401				
<b>Issue date of reviewed permit</b>	02/08/2023				
<b>Start Date Initial Permit Phosphorus Concentration limit</b>	02/08/2023				
<b>Initial Permit Phosphorus Concentration limit mg/l</b>	2				
<b>Start Date 2nd Permit Phosphorus Concentration limit</b>	n/a				
<b>2nd Phosphorus Concentration limit (2) mg/l</b>	n/a				
<b>Affected Other Allocation Sites in the Sub- Catchment:</b> There are no other identified allocations in this sub-catchment.					

Other Actions/Opportunities (extract from Table 6 2 Sub-catchment 1 action tracker provides further detailed information.)			
Focus Area	Action	Detail	Total P removal estimate (t/yr)
CoAP	Work with key stakeholders to ensure that CoAP is successfully implemented in this catchment.	Agriculture a primary source of P in the catchment. Compliance with regulations offers a chance to enhance current situation in the catchment whilst offering benefits for downstream.	Up to 0.24
Farm Source Control and SFS	Investigate farms willing to consider voluntary measures to reduce P export in the catchment	Agriculture the dominant source of P in catchment. Whilst the catchment is passing, improvements could support downstream catchments.	Up to 0.40
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)	Whilst not a priority for SAC compliance, there is an opportunity for nature-based solutions to improve the resilience of the catchment and improve water quality more generally.	Up to 0.88

## New Sub-catchment 2 - Afonydd Cleddau



Paragraph 6.2.2 of the Nutrient Management Plan advises *In summary, based on current information, Sub-catchment 2 requires action to address P compliance. These measures should focus on the Deepford Brook based on current information. With limited commitment / certainty around the measures relating to CoAP and Farm Source Control, there is a risk that without change, conditions will continue to worsen, and SAC compliance will not be achieved.*

In terms of Generic Actions in the catchment the Nutrient Management Plan advises: • *Local Development Plans (LDP): The impact of the LDP is currently unknown, this should be confirmed with the council, i.e., are there developments planned in this catchment, what impact could they have and what Category 1 measures would be required to offset.*

### Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets

Housing Allocations:	(0.002)	Housing Commitments	(-)	Windfall	(0.004)
Sewage discharge & Surface water discharge	Sewage Discharge Only		Surface Only		
None	None		HSG/022/LDP2/1 Land at Dungleddy Court Clarbeston Road		
<b>WwTW Name:</b>	Clarbeston Road				
<b>Settlement:</b>	Service Village				
<b>WwTW with allocation/ commitment</b>	Yes				
<b>Permit Number</b>	BG0014501				
<b>Issue date of reviewed permit</b>	29/04/2024				
<b>Start Date Initial Permit Phosphorus Concentration limit</b>	07/05/2024				
<b>Initial Permit Phosphorus Concentration limit mg/l</b>	5				
<b>Start Date 2nd Permit Phosphorus Concentration limit</b>	31/03/2030				
<b>2nd Phosphorus Concentration limit (2) mg/l</b>	1.5				

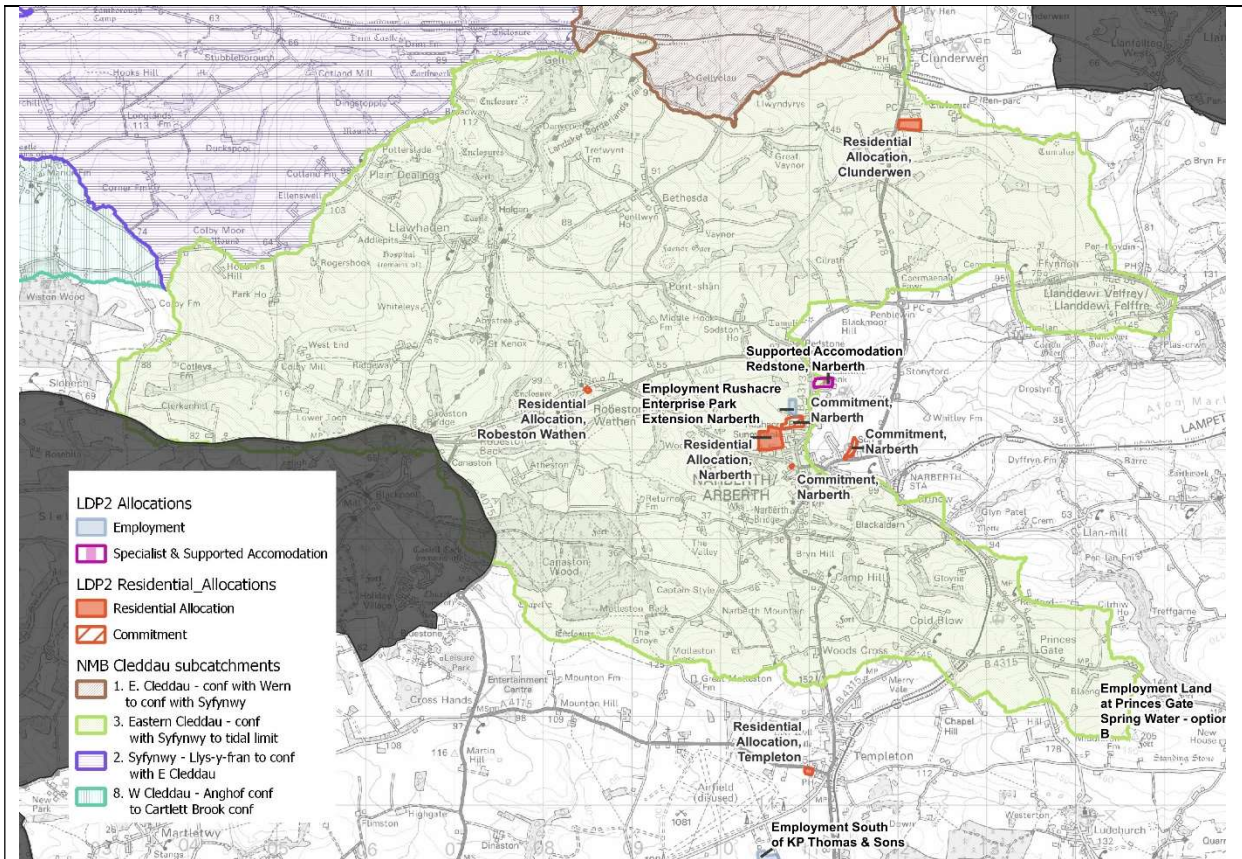
Affected Other Allocation Sites in the Sub- Catchment: None

### Other Actions/Opportunities (extract from Table 6 4 Sub-catchment 2 action tracker provides further detailed information.)

Focus Area	Action	Detail	Total P removal estimate (t/yr)
CoAP	Work with key stakeholders to ensure that CoAP is successfully	Important to maintaining SAC compliance and improving situation	Up to 0.20

	implemented in this catchment.	downstream. Focus on Deepford Brook required.	
Farm Source Control and SFS	Proactively explore opportunities to implement measures to reduce P export in the catchment from farms. Establishment of 'Zero flow' farms should be explored through in line with the holistic actions around farm source control.	Vital action in this catchment, particularly the Deepford Brook. Current projection of 10% should be seen as minimum target, further reductions would be needed to secure SAC compliance on the Deepford Brook.	Up to 0.33
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)	This measure needs to be explored given that CoAP and Farm Source Control measures are unlikely to meet the requirements for compliance. Details on sediment transport risk are highlighted in Appendix D and can guide where to focus efforts. Nature Based Solution such as woodland planting should be explored. Existing measures, if they are progressing, should be highlighted, quantified and tracked.	Up to 1.03

## New Sub-catchment 3 - Afonydd Cleddau



Paragraph 6.2.3 of the Nutrient Management Plan advises *In summary, based on current information, Sub-catchment 3 requires action to address P compliance. These measures should focus on the Narberth Brook based on current information. Additional work focussing on the prevalence of private sewerage assets in this catchment offers a tangible avenue for improvements which could prove important. However, agriculture remains a significant source of P in the catchment and with limited commitment / certainty around the measures relating to CoAP and Farm Source Control, there is a risk that without change, conditions will continue to worsen, and SAC compliance will not be achieved.*

In terms of Generic Actions in the catchment the Nutrient Management Plan advises: • *Local Development Plans (LDP): The impact of the LDP is currently unknown, this should be confirmed with the council, i.e., are there developments planned in this catchment, what impact could they have and what Category 1 measures would be required to offset.*

### Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets

Housing Allocations	(0.035)	Housing Commitments	(0.007)	Windfalls	(0.028)
Sewage discharge & Surface water discharge	Sewage Discharge Only		Surface Only		
HSG/152/LDP2/1 South of Bro'r Dderwen Clunderwen HSG/113/LDP2/01 South of Robeston Court Robeston Wathen	HSG/060/LDP2/1 Adjacent to Maesybryn Llandissilio		HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park Narberth 088/00077 Rushacre Gardens Narberth		

LDP2 Reference	Site Name	Settlement	Sewage drain into Waterbody Name	WwTW	WwTW Current phosphate limit	WwTW phosphate limit 31/03/2030 mg/l
HSG/152/LDP2/1	South of Bro'r Dderwen	Clunderwen	Longford Brook - HW to conf with E. Cleddau	Clunderwen	1	0.25
HSG/060/LDP2/1	Adjacent to Maesybryn	Llandissilio	Longford Brook - HW to conf with E. Cleddau	Clunderwen	1	0.25
HSG/088/LDP2/1	West of Bloomfield Gardens and North of Adams Drive & Highfield Park	Narberth	n/a	Narberth	n/a	n/a
088/00077	Rushacre Gardens	Narberth	n/a	Narberth	n/a	n/a
HSG/113/LDP2/01	South of Robeston Court	Robeston Wathen	Narbeth Brook - headwaters to conf with E. Cleddau	PTP	n/a	n/a

**Affected Other Allocation Sites in the Sub- Catchment:**

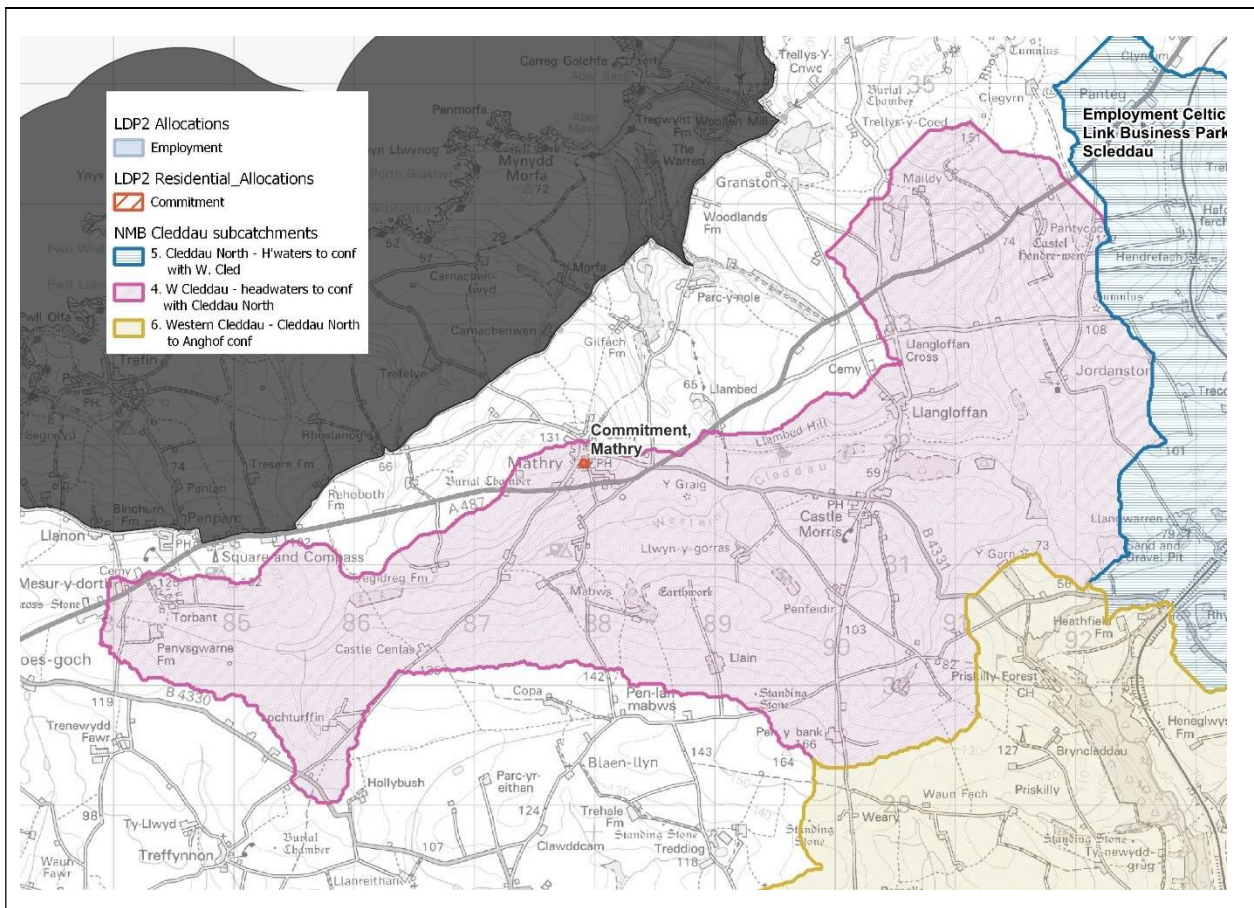
LDP2 Reference	AllocationType	Site Name	surface water Sub-Catch No	Sewage drains to	Sewage Sub-Catch No
EMP/088/LDP/01	Employment	Rushacre Enterprise Park Extension Narberth	3	Narberth STW	Outside SAC
SSA/088/LDP2/01	Supported Accommodation	Redstone, Narberth	3	PTP	3

**Other Actions/Opportunities (extract from Table 6 6 Sub-catchment 3 action tracker provides further detailed information.)**

Focus Area	Action	Detail	Total P removal estimate (t/yr)
CoAP	Work with key stakeholders to ensure that CoAP is successfully implemented in this catchment.	Important to achieve SAC Compliance and secure long-term health across wider catchment. Focus on Narbeth Brook required.	Up to 0.11
Farm Source Control and SFS	Proactively explore opportunities to implement measures to reduce P export in the catchment from farms. Establishment of 'Zero flow' farms could be explored in line with the holistic actions around farm source control.	Vital action in this catchment, particularly the Narbeth Brook.	Up to 0.19
PTPs / SPs	Assess / address performance of private sewerage assets in the catchment	Private sewerage a relatively high contribution in the Narbeth Brook compared to other catchments (noting limitations around source apportionment modelling). Improvements to these assets could prove important in the Narbeth catchment.	Up to 0.03
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based	This measure needs to be explored given that CoAP and Farm Source Control	Up to 0.58

	<p>solutions (see Appendix C-1 for complete list)</p>	<p>measures are unlikely to meet the requirements for compliance. Details on sediment transport risk are highlighted in Appendix D and can guide where to focus efforts. Nature Based Solution such as woodland planting should be explored. Existing measures, if they are progressing, should be highlighted, quantified and tracked.</p>	
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## New Sub-catchment 4 - Afonydd Cleddau



Paragraph 6.2.4 of the Nutrient Management Plan advises *In summary, based on current information, Sub-catchment 4 requires action to address phosphorus compliance. Planned enhancement works at the WwTWs in the catchment go a long way towards meeting the compliance target for the catchment. Were a constructed wetland also delivered at the Category B1 WwTW, this would likely be sufficient to meet compliance. However, exploration of measures to address agricultural exports should also be explored, particularly given uncertainty around wetlands. Furthermore, any additional measures in this upstream catchment, beyond compliance, could assist in improving the situation downstream, for example, this catchment feeds into sub-catchment 6. Table 6.8 Sub-catchment 4 action tracker provides further detailed information.*

In terms of Generic Actions in the catchment the Nutrient Management Plan advises: • **Local Development Plans (LDP):** *The impact of the LDP is currently unknown, this should be confirmed with the council, i.e., are there developments planned in this catchment, what impact could they have and what Category 1 measures would be required to offset.*

Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets

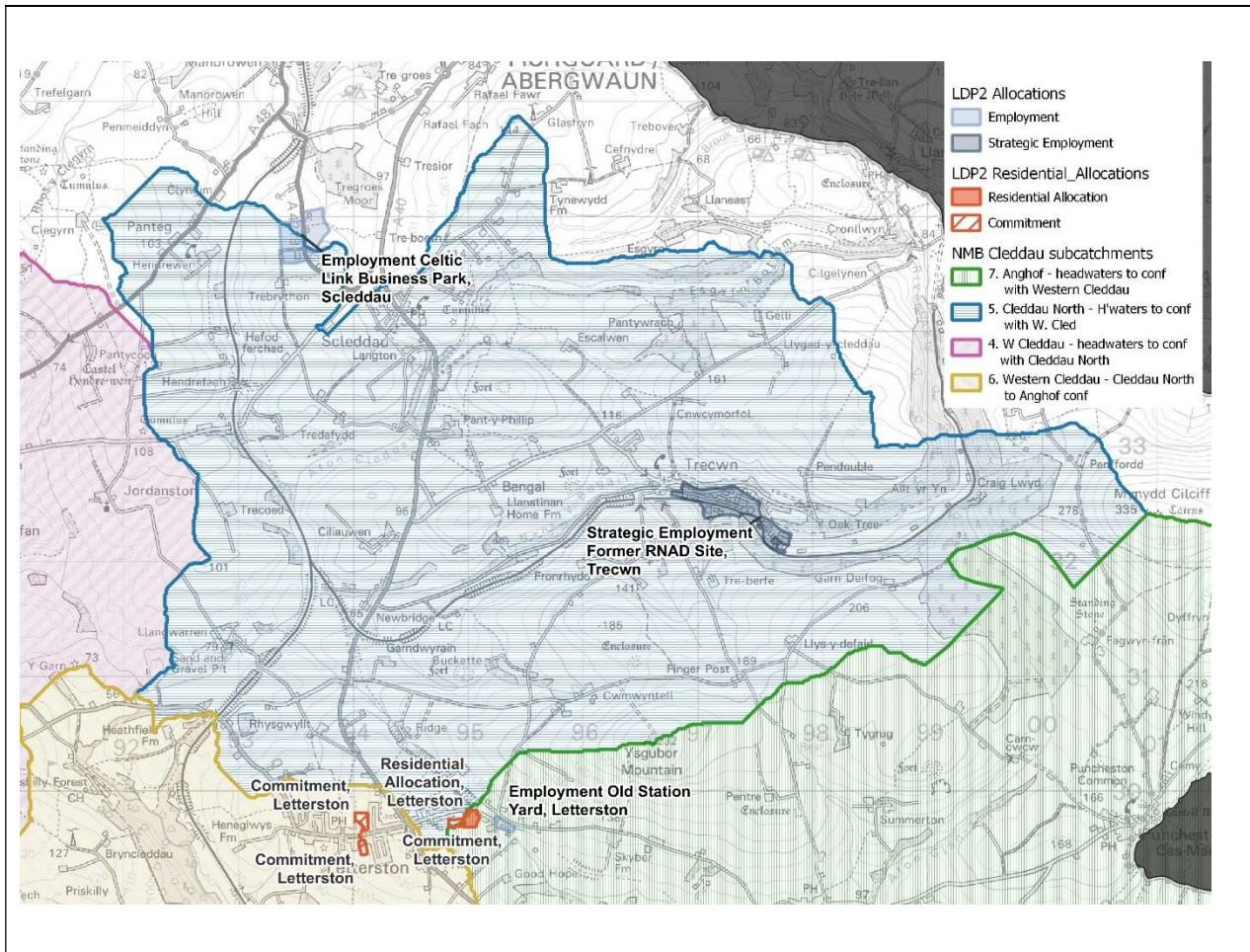
Housing Allocations	(-)	Housing Commitments	(-)	Windfalls	(0.009)
Sewage discharge & Surface water discharge	Sewage Discharge Only		Surface Only		
None	None		None		
<b>Permit Reviews</b>					
<b>WwTW Name:</b>				Mathry	
<b>Settlement:</b>				Service Village	
<b>Permit Number</b>				BG0009701	
<b>Issue date of reviewed permit</b>				04/07/2024	
<b>Start Date Initial Permit Phosphorus Concentration limit</b>				28/01/2028	
<b>Initial Permit Phosphorus Concentration limit mg/l</b>				5	
<b>Start Date 2nd Permit Phosphorus Concentration limit</b>				31/03/2030	
<b>2nd Phosphorus Concentration limit (2) mg/l</b>				1	

**Affected Other Allocation Sites in the Sub- Catchment: None**

**Other Actions/Opportunities (extract from Table 6 8 Sub-catchment 5 action tracker provides further detailed information.)**

Focus Area	Action	Detail	Total P removal estimate (t/yr)
CoAP	Work with key stakeholders to ensure that CoAP is successfully implemented in this catchment.	Important to achieve SAC Compliance and secure long-term health across wider catchment.	Up to 0.11
Farm Source Control and SFS	Proactively explore opportunities to implement measures to reduce P export in the catchment from farms. Establishment of 'Zero flow' farms could be explored in line with the holistic actions around farm source control.	Important action given uncertainty around Wetlands and potential for improvements in this catchment to support downstream efforts.	Up to 0.07
Enhanced WwTW	Improvements at Mathry WwTWs.	As part of the RoP and DCWW's Improvement plans, this asset will be upgraded to deliver enhanced P removal	0.28
Wetlands	Opportunity for constructed wetlands at Castlemorris	A constructed wetland at Castlemorris is available considering DCWW's collaboration categorisation (Cat. B1). This could remove additional P from the catchment, above the upgrades already planned at this WWTW.	Estimated 0.1
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)	This measure could prove important for downstream catchments, assuming other measures listed above are delivered. Details on sediment transport risk are highlighted in Appendix D and can guide where to focus efforts. Nature Based Solution such as woodland planting should be explored. Existing measures, if they are progressing, should be highlighted, quantified and tracked.	Up to 0.18

## New Sub-catchment 5 - Afonydd Cleddau



Paragraph 6.2.5 of the Nutrient Management Plan advises: *In summary, based on current information, Sub-catchment 5 does not require immediate or urgent action to address P compliance. However, given the uncertainty attached to the current assessment period, measures should still be explored. Efforts in this catchment may offer benefits to downstream catchments.*

In terms of Generic Actions in the catchment the Nutrient Management Plan advises: • *Local Development Plans (LDP): The impact of the LDP is currently unknown, this should be confirmed with the council, i.e., are there developments planned in this catchment, what impact could they have and what Category 1 measures would be required to offset.*

Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets

Housing Allocations	(-)	Housing Commitments	(-)	Windfalls	(0.010)
Sewage discharge & Surface water discharge	Sewage Discharge Only		Surface Only		
None	None		None		

Permit Review

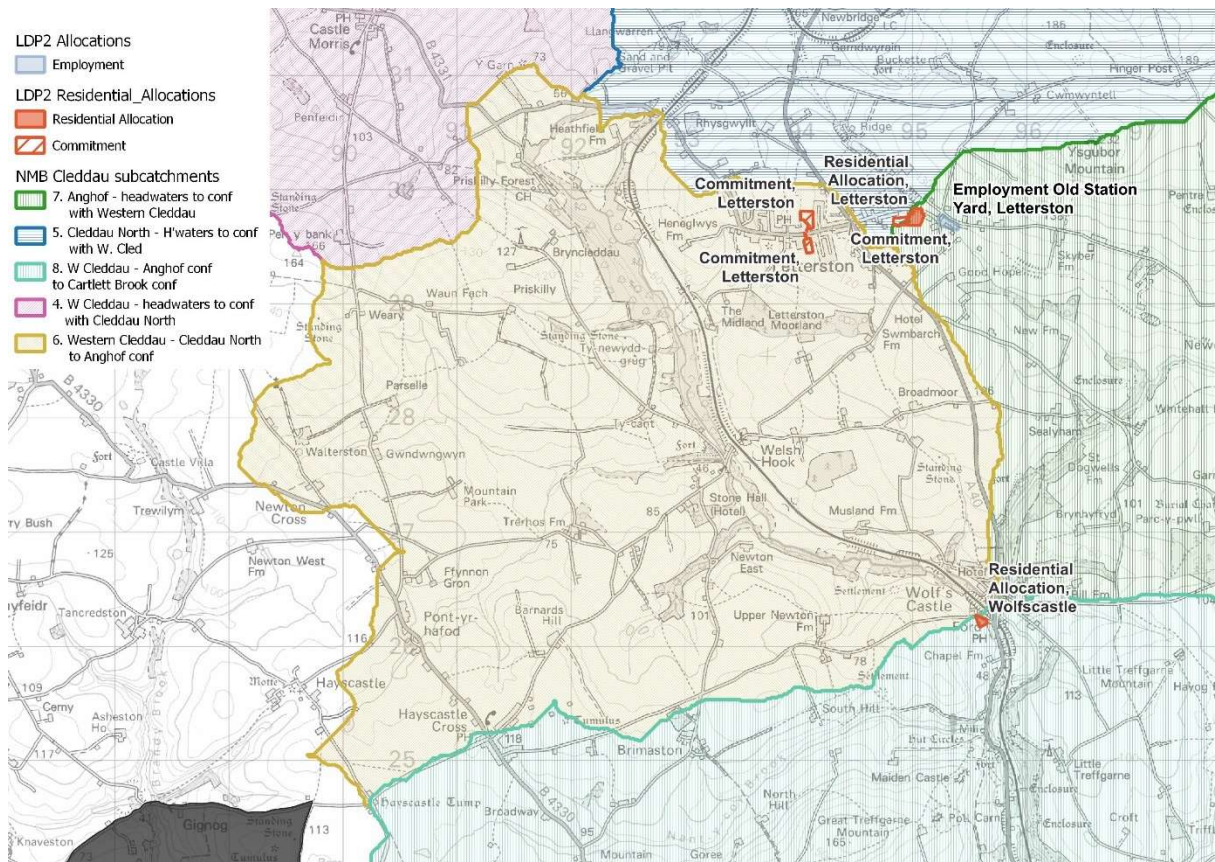
Affected Other Allocation Sites in the Sub- Catchment:

LDP2 Reference	AllocationType	Site Name	surface water Sub-Catch No	Sewage drains to	Sewage Sub-Catch No
EMP/034/00006	Employment	Celtic Link Business Park, Scleddau	5	PTP (Crosses watershed may drain to Fishguard)	5
S/EMP/136/00001	Strategic Employment	Former RNAD Site, Trecwn	5	PTP	5

Other Actions/Opportunities (extract from Table 6 9 Sub-catchment 5 action tracker provides further detailed information.)

Focus Area	Action	Detail	Total P removal estimate (t/yr)
CoAP	Agriculture a primary source of P in the catchment. Compliance with regulations offers a chance.	Important to maintaining SAC compliance and improving situation downstream	Up to 0.08
Farm Source Control and SFS	Investigate farms willing to consider voluntary measures to reduce P export in the catchment	Agriculture the dominant source of P in catchment. Whilst the catchment is passing, improvements could support downstream catchments.	Up to 0.14
Enhanced WwTW	Improvements at Panteg WwTWs	As part of the RoP and DCWW's Improvement plans, this asset will be upgraded to deliver enhanced P removal	0.03
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)	Whilst not a priority for SAC compliance, there is an opportunity for nature-based solutions to improve the resilience of the catchment and improve water quality more generally.	Up to 0.38

## New Sub-catchment 6 - Afonydd Cleddau



Paragraph 6.2.6 of the Nutrient Management Plan advises: *In summary, based on current information, Sub-catchment 6 requires action to address P compliance. Currently, planned measures at Letterston WwTW are projected to sufficiently reduce P export and achieve compliance. However, catchments further downstream have more difficult challenges, and so efforts to explore mitigation to further reduce P should be explored, focussing on agricultural sources.*

In terms of Generic Actions in the catchment the Nutrient Management Plan advises: • Local Development Plans (LDP): The impact of the LDP is currently unknown, this should be confirmed with the council, i.e., are there developments planned in this catchment, what impact could they have and what Category 1 measures would be required to offset.

Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets

Housing Allocations	(0.011)	Housing Commitments	(-)	Windfalls	(0.011)
Sewage discharge & Surface water discharge	Sewage Discharge Only			Surface Only	
None	HSG/053/LDP2/1 Between Longstone Court and 62, St. Davids Road Letterston			None	
<b>Mitigation Planned and Opportunities</b>					
WwTW Name	Current Permit Phosphorus limit mg/l	Start Date 2nd Permit Phosphorus Concentration limit 31/12/2025			
LETTERSTON WEST	5	2.5			

**Affected Other Allocation Sites in the Sub- Catchment:**

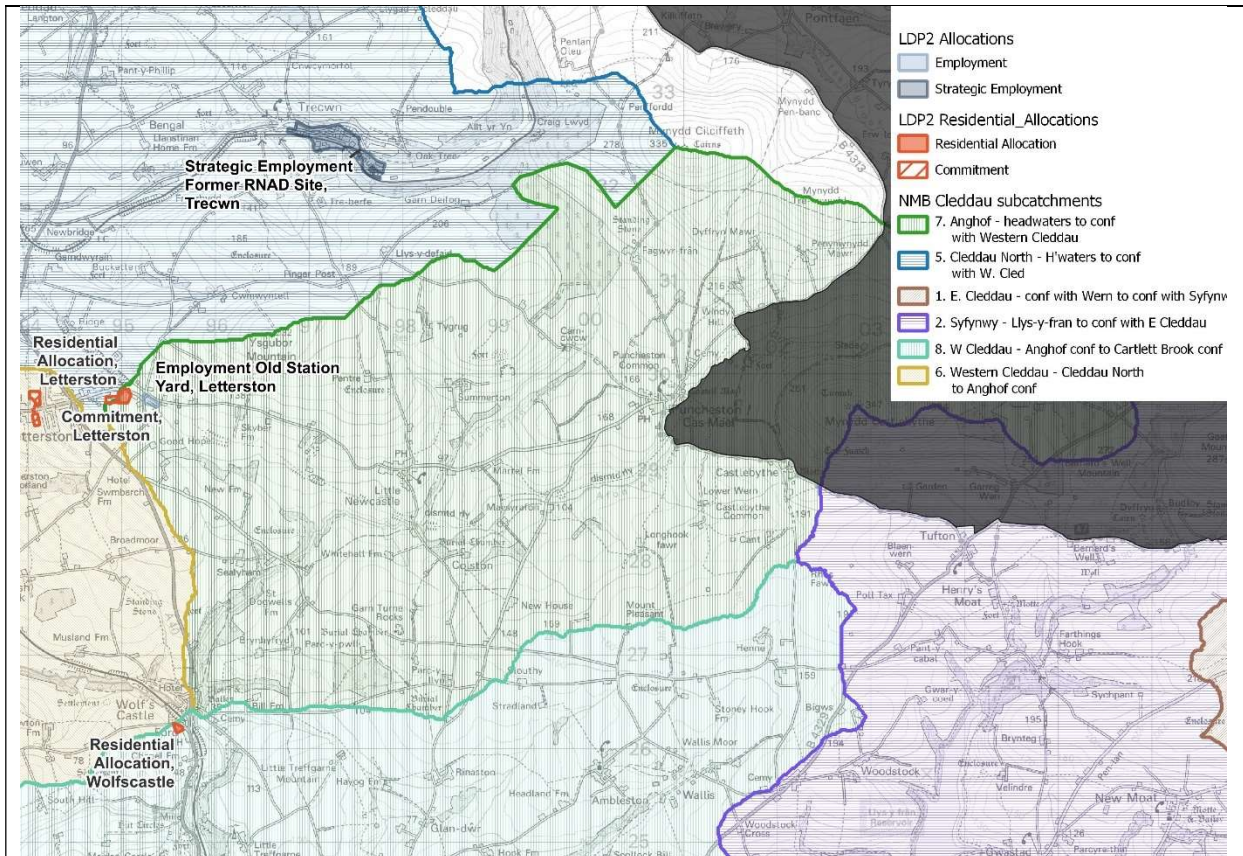
There are two other allocations located in this sub- catchment. Phosphorous loads have not been calculated as it is considered that it would be difficult to make meaningful assumptions regarding these proposals.

LDP2 Reference	AllocationType	Site Name	surface water Sub-Catch No	Sewage drains to	Sewage Sub-Catch No
SPV/149/LDP2/01	Solar Array	Ford Farm, Wolfscastle	6	N/A	6
EMP/053/00001	Employment	Old Station Yard, Letterston	7	Letterston STW subcatchment 6	6

**Other Actions/Opportunities (extract from Table 6 11 Sub-catchment 6 action tracker provides further detailed information.)**

Focus Area	Action	Detail	Total P removal estimate (t/yr)
CoAP	Agriculture a primary source of P in the catchment. Compliance with regulations offers a chance.	Important to maintaining SAC compliance and improving situation downstream	Up to 0.06
Farm Source Control and SFS	Investigate farms willing to consider voluntary measures to reduce P export in the catchment	Agriculture the dominant source of P in catchment. Whilst the catchment is passing, improvements could support downstream catchments.	Up to 0.11
Enhanced WwTW	Improvements at Letterston West STW	As part of the RoP and DCWW's Improvement plans, this asset will be upgraded to deliver enhanced P removal (see above for timescales)	0.58
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)	Whilst not a priority for SAC compliance, there is an opportunity for nature-based solutions to improve the resilience of the catchment and improve water quality more generally.	Up to 0.39

## New Sub-catchment 7 - Afonydd Cleddau



Paragraph 6.2.7 of the Nutrient Management Plan advises: *In summary, based on current information, Sub-catchment 7 requires action to address P compliance. Given the relatively small % reduction needed in this catchment, actions proposed under CoAP and Farm Source Control are likely to be sufficient. However, further opportunities including constructed wetlands at the category B WwTW offering opportunities to go beyond compliance and provide benefits for the struggling catchments downstream.*

In terms of Generic Actions in the catchment the Nutrient Management Plan advises: • *Local Development Plans (LDP): The impact of the LDP is currently unknown, this should be confirmed with the council, i.e., are there developments planned in this catchment, what impact could they have and what Category 1 measures would be required to offset.*

### Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets

Housing Allocations	(0.009)	Housing Commitments	(-)	Windfalls	(0.014)
Sewage discharge & Surface water discharge	Sewage Discharge Only		Surface Only		
None	HSG/149/LDP2/1 Land at Ford Farm Wolfscastle		HSG/053/LDP2/1 Between Longstone Court and 62, St. Davids Road Letterston		

### Permit Review

WwTW Name	Current Permit Phosphorus limit mg/l	Start Date 2nd Permit Phosphorus Concentration limit 31/03/2030	
Wolscastle	5	2.3mg/l	
LDP2 Reference	Site Name	Settlement	WwTW
HSG/149/LDP2/1	Land at Ford Farm	Wolfscastle	WOLFSCASTLE

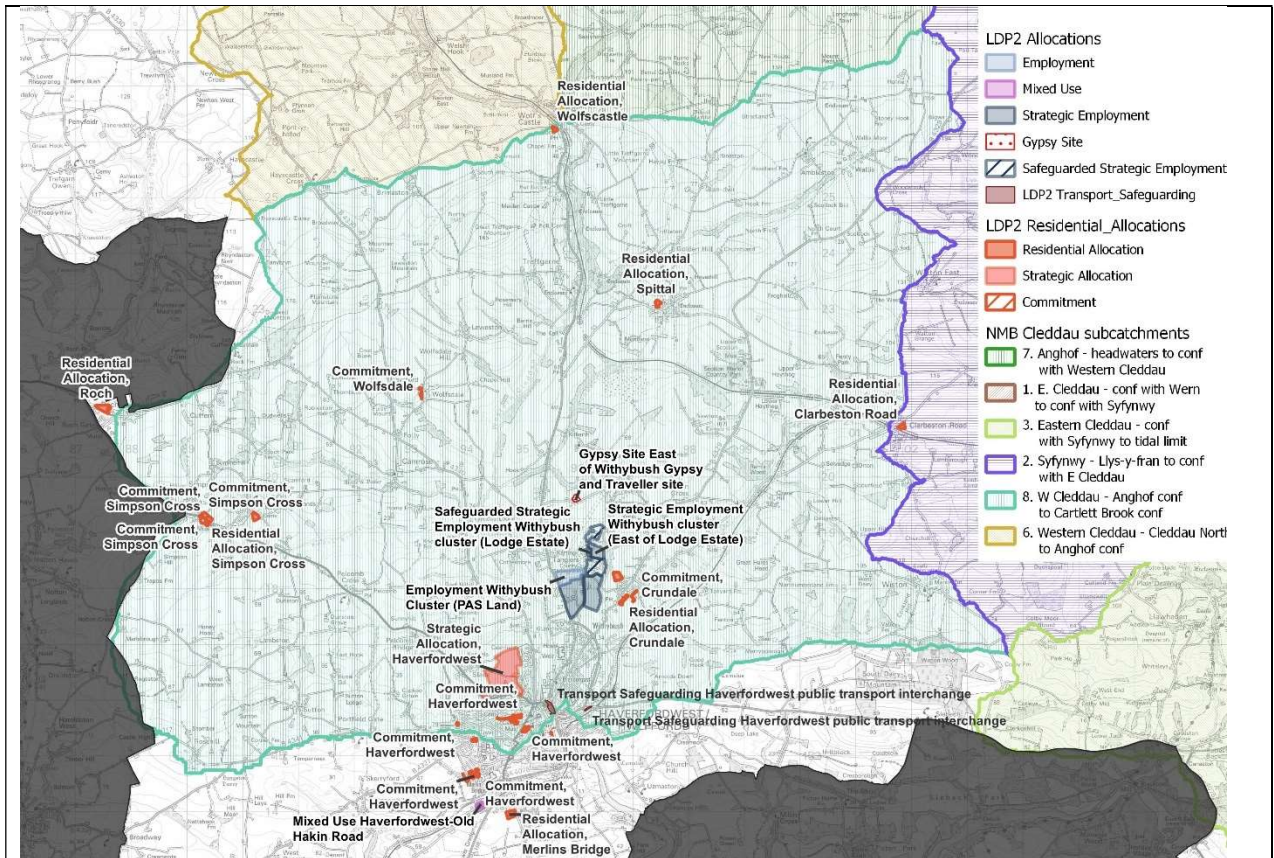
### Affected Other Allocation Sites in the Sub- Catchment

There is one other allocation located in this sub- catchment. Phosphorous loads have not been calculated as it is considered that it would be difficult to make meaningful assumptions regarding these proposals.

LDP2 Reference	AllocationType	Site Name	surface water Sub-Catch No	Sewage drains to	sewage Sub-Catch No
EMP/053/00001	Employment	Old Station Yard, Letterston	7	Letterston STW subcatchment 6	6

Other Actions/Opportunities (extract from Table 6.13 Sub-catchment 7 action tracker provides further detailed information.)			
Focus Area	Action	Detail	Total P removal estimate (t/yr)
CoAP	Work with key stakeholders to ensure that CoAP is successfully implemented in this catchment.	Important to achieve SAC Compliance and secure long-term health across wider catchment.	Up to 0.12
Farm Source Control and SFS	Proactively explore opportunities to implement measures to reduce P export in the catchment from farms. Establishment of 'Zero flow' farms could be explored in line with the holistic actions around farm source control.	Important action given uncertainty around Wetlands and potential for improvements in this catchment to support downstream efforts.	Up to 0.20
Wetlands	Opportunity for Constructed Wetlands at Puncheston and Wolfscastle	Constructed Wetlands possible considering DCWW's collaboration categorisation (Cat. B1). This could remove additional P from the catchment.	Estimated 0.2
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)	This measure could prove important for downstream catchments, assuming other measures listed above are delivered. Details on sediment transport risk are highlighted in Appendix D and can guide where to focus efforts. Nature Based Solution such as woodland planting should be explored. Existing measures, if they are progressing, should be highlighted, quantified and tracked.	Up to 0.48

## New Sub-catchment 8 - Afonydd Cleddau



Paragraph 6.2.8 of the Nutrient Management Plan advises *In summary, sub-catchment 8 is in urgent need of mitigation. The measures currently identified, at a high-level, demonstrate a clear challenge around implementation. Without intervention, that goes beyond voluntary measures on farms or current compliance regulations, the situation in the lower reaches of the Western Cleddau will not improve. Whilst the NMB and its stakeholders should continue to pursue opportunities, a robust plan to meet compliance in this catchment is not currently achievable. Addressing data gaps with regards to agricultural sources will go some way to better understanding what needs to be done. However, this needs to be carried out in tandem with a targeted look at options within the catchment to address the current balance of nutrients in / out of the catchment.*

In terms of Generic Actions in the catchment the Nutrient Management Plan advises: • *Local Development Plans (LDP): The impact of the LDP is currently unknown, this should be confirmed with the council, i.e., are there developments planned in this catchment, what impact could they have and what Category 1 measures would be required to offset.*

### Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets

Housing Allocations	(0.142153)	Housing Commitments	(0.002)	Windfalls	(0.058)
Sewage discharge & Surface water discharge	Sewage Discharge Only		Surface Only		
HSG/049/LDP2/1 Keeston East of Brookfield Close	HSG/022/LDP2/1 Clarbeston Road Land at Dungleddy Court		HSG/149/LDP2/1 Land at Ford Farm Wolfscastle HSG/029/00014 Opposite Woodholm Close Crundale HSG/029/LDP2/1 West of Ashford Park Crundale HSG/040/LDP2/1 Former Education Centre, Dew Street Haverfordwest S/HSG/040/LDP2/6 Slade Lane Haverfordwest		
HSG/119/LDP2/1 Simpson Cross Between Cornerways and Austalise			040-00373		
HSG/120/00018 Spittal North West of Wesley Way					

		Calvary Church Haverfordwest 029/00013 Dingle Lane Crundale 029/00026 Woodholm Farm Crundale
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#### Permit Reviews

Following liaison with representatives of DCWW, it has been established 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.

WwTW	WwTW Current phosphate limit	WwTW phosphate limit 31/03/2030 mg/l
CLARBESTON ROAD	5	1.5
KEESTON	5	1.5
SPITTAL	0.6	n/a

LDP2 Reference	Site Name	Settlement	WwTW
HSG/022/LDP2/1	Land at Dungleddy Court	Clarboston Road	CLARBESTON ROAD
HSG/049/LDP2/1	East of Brookfield Close	Keeston	KEESTON
HSG/119/LDP2/1	Between Cornerways and Austalise	Simpson Cross	KEESTON
HSG/120/00018	North West of Wesley Way	Spittal	SPITTAL

#### Affected Other Allocation Sites in the Sub- Catchment

There are numerous other allocations located in this sub- catchment. Phosphorous loads have not been calculated as it is considered that it would be difficult to make meaningful assumptions regarding these proposals.

LDP2 Reference	Allocation Type	Site Name	surface water Sub-Catch No	Sewage drains to	Sewage Sub-Catchment
S/EMP/040/00005	Strategic Employment	Withybush cluster (East of Lodge Estate)	8	Merlins Bridge STW	Outside SAC
S/EMP/040/00001	Strategic Employment	Withybush cluster (West Estate)	8	Merlins Bridge STW	Outside SAC
SPV/149/LDP2/01	Solar Array	Ford Farm, Wolfscastle	8	N/A	8
S/EMP/040/00011	Safeguarded Strategic Employment	Withybush cluster (East Estate)	8	Merlins Bridge STW	Outside SAC
S/EMP/040/00012	Safeguarded Strategic Employment	Withybush cluster (North Estate)	8	Merlins Bridge STW	Outside SAC
S/EMP/040/00015	Safeguarded Strategic Employment	Withybush cluster (Lodge Estate)	8	Merlins Bridge STW	Outside SAC
EMP/040/LDP2/01	Employment	Withybush Cluster (PAS Land)	8	Merlins Brdige STW	Outside SAC
S/EMP/040/00004	Strategic Employment	Withybush cluster (Trading Estate)	8	Merlins Brdige STW	Outside SAC
GT/040/LDP2/01	Gypsy Site	East of Withybush Gypsy and Traveller site	8	PTP	

#### Other Actions/Opportunities (extract from Table 6.13 Sub-catchment 7 action tracker provides further detailed information.)

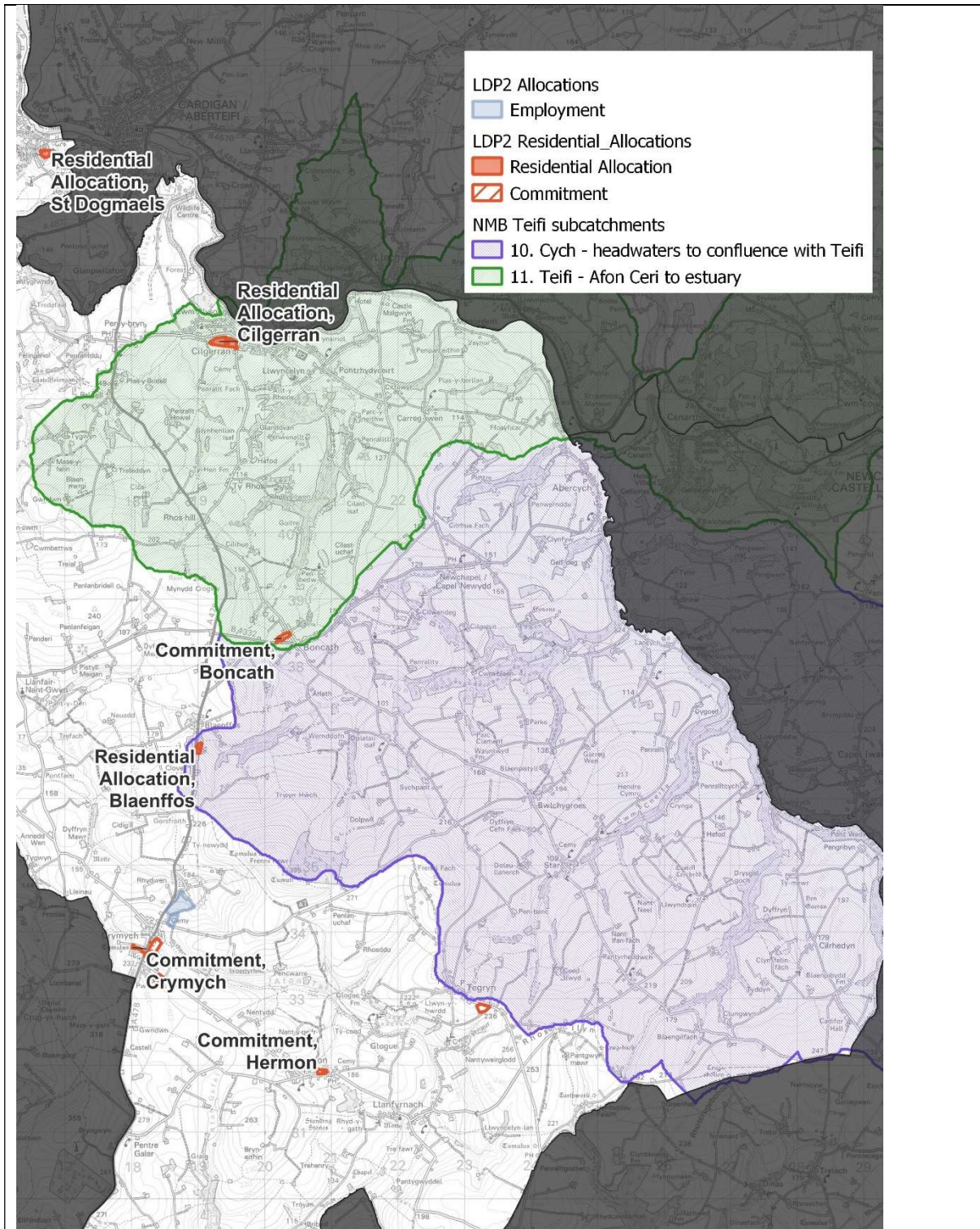
Focus Area	Action	Detail	Total P removal estimate (t/yr)
CoAP	Work with key stakeholders to ensure that CoAP is successfully implemented in this catchment.	Important to achieve SAC Compliance and secure long-term health across wider catchment.	Up to 0.53
Farm Source Control and SFS	Proactively explore opportunities to implement measures to reduce P export in the catchment from farms.	Agriculture the dominant source of P in catchment. Establishment of 'Zero flow' farms could be explored in line with the holistic actions around farm source	Up to 0.88

		control. Emphasis needed on how to achieve or surpass the 10% estimate.	
Enhanced WwTW	Improvements at Camrose, Keeston, Clarbston and Spittal WwTWs.	As part of the RoP and DCWW's Improvement plans, these assets will be upgraded to deliver enhanced P removal	0.51
Wetlands	Opportunities at three Category B WwTW.	An opportunity for CONSTRUCTED WETLANDS at Castlemoris is available considering DCWW's collaboration categorisation (Cat. B1). This could remove additional P from the catchment, above the upgrades already planned at this WWTW.	Estimated 0.3
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)	This measure could prove important for downstream catchments, assuming other measures listed above are delivered. Details on sediment transport risk are highlighted in Appendix D and can guide where to focus efforts. Nature Based Solution such as woodland planting should be explored. Existing measures, if they are progressing, should be highlighted, quantified and tracked.	Up to 3.22

5.55 The Teifi Nutrient Management Plan approved in August 2025 similarly contains a waterfall chart for the relevant sub-catchment for Pembrokeshire (sub-catchments 10 and 11). It should also be noted that other land uses have not been included in these calculations.

5.56 Action Plans are then set out for each Sub-catchment in Section 6 of the Nutrient Management Plan. Action tracker tables are also included for each sub-catchment.

## New Sub-catchment 10 - Teifi



Section 6.2.10 of the Nutrient Management Plan advises *In summary, based on current information, Sub-catchment 10 requires a range of actions to meet its compliance target. Because the catchment is a tributary of the Teifi, upstream improvements cannot be relied upon. Furthermore, there are significant implementation challenges associated with the measures required from the various focus areas in this sub-catchment. Whilst the NMB and its stakeholders should continue to pursue opportunities, a robust plan to meet compliance in this catchment is not currently achievable. Addressing data gaps with regards to agricultural sources will go some way to better understanding what needs to be done. However, this needs to be carried out in tandem with a targeted look at options within the catchment to address the current balance of nutrients in / out of the catchment.*

Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets

Housing Allocations	(0.003)	Housing Commitments	(-)	Windfalls	( 0.015)
Sewage discharge & Surface water discharge		Sewage Discharge Only		Surface Only HSG/006/00003 Adjacent to Hafod Blaenffos	
<b>Permit Reviews – not applicable</b>					
<b>Affected Other Allocation Sites in the Sub- Catchment: None</b>					
<b>Other Actions/Opportunities (extract from Table 6.13 Sub-catchment 7 action tracker provides further detailed information.)</b>					
Focus Area	Action	Detail	Total P removal estimate (t/yr)		
Enhanced WwTW	Improvements at Capel Iwan and Newchapel WwTW.	As part of the RoP and DCWW's Improvement plans, this asset will be upgraded to deliver enhanced P removal	Up to 0.16		
CoAP	Work with key stakeholders to ensure that CoAP is successfully implemented in this catchment.	Agriculture a primary source of P in the catchment. Ensuring compliance with policies will be important in this catchment to achieve SAC compliance	Up to 0.25		
Farm Source Control and SFS	Proactively explore opportunities to implement measures to reduce P export in the catchment from farms.	Agriculture the dominant source of P in catchment. Establishment of 'Zero flow' farms could be explored in line with the holistic actions around farm source control. Emphasis needed on how to achieve or surpass the 10% estimate.	Up to 0.42		
Wetlands	Opportunity for constructed wetlands at Abercych	Constructed wetland available considering DCWW's collaboration categorisation (Cat. B1). This could remove additional P from the catchment and improve conditions for the downstream catchments.	Estimated 0.10		
PTPs / SPs	Assess / address performance of private sewerage assets in the catchment	Private sewerage is a relatively high contribution in the Cych – headwaters to confluence with Teifi compared to other catchments (noting limitations around source apportionment modelling).	Up to 0.01		

<p>Riparian buffers &amp; other Nature Based Solutions</p>	<p>Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)</p>	<p>Whilst not a priority for SAC compliance, there is an opportunity for nature-based solutions to improve the resilience of the catchment and improve water quality more generally.</p>	<p>Up to 0.90</p>
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## New Sub-catchment 11 - Teifi

See Map for sub catchment 10						
Section 6.2.11 of the Nutrient Management Plan advises <i>In summary, based on current information, Sub-catchment 11 requires attention to address P compliance failures. However, considering that potential upstream works, if implemented, will have a positive impact, and that within the Sub-catchment 11 there are good opportunities and the failure is currently low (2% reduction required), it can be said that there is a credible route to achieving compliance. This will require a coordinated approach to mitigation implementation across all sub-catchments.</i>						
Affected Housing Sites in the Catchment – Anticipated Additional Loads Screened in – tonnes per year in brackets						
Housing Allocations	(0.034)	Housing Commitments	(0.016)	Windfalls	(0.018)	
Sewage discharge & Surface water discharge HSG/020/LDP2/1 Land at Tan Ffynnon Fields Cilgerran 007/00047 Old Station Yard Boncath	Sewage Discharge Only  None			Surface Only  None		
<b>Permit Review</b>						
LDP2 Reference	Site Name	Settlement	Sewage drain into Waterbody Name	WwTW	WwTW Current phosphate limit	WwTW phosphate limit 31/03/2030 mg/l
HSG/020/LDP2/1	Land at Tan Ffynnon Fields	Cilgerran	Teifi - Afon Ceri to estuary	CILGERRAN	5	n/a
007/00047	Old Station Yard	Boncath	Y	BONCATH	5	n/a
<b>Affected Other Allocation Sites in the Sub- Catchment:</b> None						
<b>Other Actions/Opportunities (extract from Table 6.13 Sub-catchment 7 action tracker provides further detailed information.)</b> None						
Focus Area	Action	Detail		Total P removal estimate (t/yr)		
CoAP	Work with key stakeholders to ensure that CoAP is successfully implemented in this catchment.	Agriculture a primary source of P in the catchment. Ensuring compliance with policies will be important in this catchment to achieve SAC compliance.		Up to 0.25		
Farm Source Control and SFS	Proactively explore opportunities to implement measures to reduce P export in the catchment from farms.	Agriculture the dominant source of P in catchment. Establishment of 'Zero flow' farms could be explored in line with the holistic actions around farm source control. Emphasis needed on how to achieve or surpass the 10% estimate.		Up to 0.42		
Enhanced WwTW	Improvements at Capel Iwan	As part of the RoP and DCWW's Improvement plans, these assets will		0.16		

	and Newchapel WwTW.	be upgraded to deliver enhanced P removal	
Wetlands	Opportunity for constructed wetlands at Abercych	Constructed wetland available considering DCWW's collaboration categorisation (Cat. B1). This could remove additional P from the catchment and improve conditions for the downstream catchments	Estimated 0.10
PTPs / SPs	Assess / address performance of private sewerage assets in the catchment	Private sewerage is a relatively high contribution in the Cych - headwaters to confluence with Teifi compared to other catchments (noting limitations around source apportionment modelling).	Up to 0.01
Riparian buffers & other Nature Based Solutions	Investigate opportunities to deliver riparian buffers or other nature-based solutions (see Appendix C-1 for complete list)	Whilst not a priority for SAC compliance, there is an opportunity for nature-based solutions to improve the resilience of the catchment and improve water quality more generally.	Up to 0.90

5.57 **New** The Welsh Government Interim Planning Policy Statement on Development in SAC Rivers advises '6.6.31 *A fair share approach relies on effective co-operation taking place in practice across sectors. This in turn broadens the restoration and mitigation options available across catchments to address water quality and conservation objectives whilst at the same time enabling the wider needs of communities to be met. The Nutrient Management Boards will have an invaluable role in setting out the necessary measures and options which have been demonstrated under a fair share approach and are necessary to meet conservation objectives. In turn, this will assist local planning authorities when preparing development plans and in making decision on applications, as well as those proposing development.*<sup>41</sup>

6.6.33 *Where new development is dependent upon an existing permit that represents a risk of deterioration, and a decision-maker is satisfied that appropriate steps (other action) to avoid deterioration under Article 6(2) of the Habitats Directive have been secured, a decisionmaker can rely upon the action to be taken when applying the integrity test under Article 6(3) of the Directive (regulation 63 of the Habitats Regulations) in respect of the new proposal. The action to be taken (appropriate steps) can be regarded as 'secure' if:*

- *The scale of further improvements necessary to avoid deterioration from existing/ongoing activities has been estimated (as far as reasonably possible*

<sup>41</sup> <https://www.gov.wales/sites/default/files/publications/2025-08/interim-planning-policy-statement-on-development-in-sac-rivers.pdf>

on the basis of information currently available);

- *The ‘appropriate steps’ to be taken have been clearly identified and associated with an appropriate delivery mechanism, making proportionate use of statutory powers as necessary to facilitate delivery as soon as reasonably practicable;*

- *There is a clear timeframe for implementation of ‘appropriate steps’ to be taken with associated delivery progress milestones towards achievement of the conservation objective phosphorus targets;*

*6.6.34 Where new development relies upon action to be taken, interdependence must be established to ensure that decision-making for new development is conditional upon associated delivery progress milestones being achieved.*<sup>42</sup>

- 5.58 **New** The Afonydd Cleddau Nutrient Management Plan was signed off in July 2025 and the Teifi Nutrient Management Plan in August 2025. The scale of further improvements necessary to avoid deterioration from existing/ongoing activities has been estimated (as far as reasonably possible on the basis of information currently available) has been provided.
- 5.59 **New** The ‘appropriate steps’ to be taken have been clearly identified and associated with an appropriate delivery mechanism, identifying where statutory powers can be used to facilitate delivery.
- 5.60 **New** The Sub-catchment action tracker tables identify actions, anticipated phosphorous removal levels, timescales, cost estimates, lead responsibility, Intervention Gateway (identifying implementation stage reached/action now needed), commentary on progress so far and next steps. There are however no specific time frames for these actions with Welsh Water Sewage Treatment works being the most specific and often identified as coming forward within a range of years.
- 5.61 **New** Section 7.2 of both Nutrient Management Plans then sets out what is now needed to monitor progress of the NMB Action Plans. *Alongside the roles and responsibilities of the key stakeholders, the NMB has set out within this NMP a series of actions to address gaps in the evidence base as well as mitigation measures. These measures will address known / planned development (Category 1 measures) or provide wider improvements within the catchment designed to provide additional environmental headroom and assist in restoring the SAC to favourable condition (Category 2 measures).  
...., the NMB is a voluntary agreement between groups to facilitate the restoration of the SAC regarding nutrients in particular. The board is supported by a Technical Advisory Group (TAG) and a Stakeholder Group (SG).  
To ensure the success of these actions, the following recommendations are made to support regular progress updates and management of the Action Plan:*
- *Quarterly updates of the Action Plan tables presented in Section 6. This should be tracked in excel tables with access for all members of the*

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<sup>42</sup> <https://www.gov.wales/sites/default/files/publications/2025-08/interim-planning-policy-statement-on-development-in-sac-rivers.pdf>

NMB, SG and TAG.

- *In addition to the above, LPAs to provide a concise quarterly review of developments versus mitigation status to ensure that as development is brought forward, planning is in place to deliver mitigation.*
- *Annual update of the NMP with an activity round up and formal update to the Action Plan tables, gateway and opportunity tracker.*
- *Biannual updates from DCWW / NRW on key projects / initiatives to be captured and tracked by the NMB.*
- *Agree regular reporting timelines for water quality monitoring to ensure measures and impact can be tracked (current cycle of reporting over several years will not successfully identify improvements)*
- *Continued TAG and SG meetings at a regular interval to discuss case studies, project progress / deep dives to ensure knowledge sharing and innovation.*

5.61. **New** Paragraph 15.1.1 of the IPPS also advises that the need for nutrient neutrality approaches being required where :

- planned NRW Review of Permit amendments achieve the downstream P targets, but improvements will not be delivered before impacts from planned development arise – SHORT TERM NEUTRALITY REQUIRED
- Where other ‘fair share’ action to achieve downstream P targets cannot be ‘secured - NEUTRALITY REQUIRED FOR LIFETIME OF DEVELOPMENT.
- Where an integrated approach to the delivery of management, restoration and mitigation is not achievable in practice - NEUTRALITY REQUIRED FOR LIFETIME OF DEVELOPMENT.

5.62 **New** At this point it is uncertain as to whether other ‘fair share’ action to achieve downstream P targets are secure. Therefore, mitigation through policy provisions of the Local Development Plan needs to take account of this uncertainty.

**New Existing Safeguards and Mitigation in Policy regarding Phosphates (and Nitrogen)**

5.63 **New** Policies detailed within the Deposit 2 Local Development Plan 2 will provide, to some degree, safeguards and a level of mitigation.

**New Table 34 Existing Safeguards and Mitigation in Policy**

5.8 Policy Reference	7.9 Text/Policy or Reasoned Justification
SP 12 Maintaining and Enhancing the Natural Environment	Policy: 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

5.8 Policy Reference	7.9 Text/Policy or Reasoned Justification
	<p>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.</p>
<p>SP 13 Port and Energy Related Development and Celtic Freeport</p>	<p>Reasoned Justification: 4.80: Individual proposals coming forward under policy SP 13 will require project level Habitats Regulation Assessment to consider their likely significant effects on the features of the SAC. One element of this is that there must be no increase in nutrients into the Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes.</p>
<p>SP 14 Strategic Employment Provision</p>	<p>Reasoned Justification: 4.91: Natural Resources Wales has advised that all Strategic Employment Sites at Withybush must connect to the public foul sewer. Environmental Permits for private drainage will not be issued here. It also advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire Marine SAC will require Habitats Regulations Assessment (HRA).</p>
<p>GN 1 General Development Policy</p>	<p>Criterion 5) It respects and protects the natural environment with no unacceptable adverse effects (a harmful impact that cannot be satisfactorily mitigated) on the environment including protected sites, habitats and species;..</p> <p>9) It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on water quality (see also policy GN 47);</p> <p>Reasoned justification 5.11: There is further detail on policy requirements relating to water quality in policy GN 47 Water Quality and Protection of Water Courses. This is a reflection in particular of the raised awareness of river catchment pollution issues relating to nutrients, including phosphates and nitrates, which affects the rivers protected by SAC designations in Pembrokeshire, the Afon Teifi and the Afon Cleddau. There is new guidance from Natural Resources Wales on phosphates in the non-tidal parts of the SAC rivers in Wales and it has been found that the levels of phosphates in the non-tidal parts of both the Teifi and Cleddau catchments are too high. It is anticipated that further guidance from Natural Resources Wales, but relating to the tidal parts of the SAC rivers in Wales (including the Teifi and Cleddau), will be issued in the future.</p> <p>5.12 With reference to sustainable drainage, new developments of more than one dwelling, or where the</p>

5.8 Policy Reference	7.9 Text/Policy or Reasoned Justification
	<p>area covered by construction work equals or exceeds 100 square metres, require approval from the SuDS Approving Body (SAB) – which in Pembrokeshire is the County Council. Construction cannot commence until SuDS approval from the SAB is in place – even if planning permission has been granted.</p> <p>5.13 Planning Policy Wales, edition 12, advises that the provision of SuDS should form an integral part of the design of new development and should be an early-stage task in putting together development proposals.</p> <p>5.14 For Development Planning purposes, PPW edition 12 advocates collaborative approaches to sustainable drainage, drawing on evidence obtained through green infrastructure assessments, with a view to integrating SuDS into growth strategies for particular areas. The provisions of this Plan, in combination with the SuDS schemes approved by the SAB, will help to deliver that aspiration.</p> <p>5.15 When providing SuDS, it may sometimes be necessary to use hard infrastructure solutions, for instance where there are important archaeological considerations. However, in most cases, nature-based solutions are the preferred option. Where ground conditions preclude the use of SuDS, for instance where glacial tills are present, the next best available solution to site drainage will be sought.</p>
GN 2 Sustainable Design	<p>Policy:3) it includes a resource efficient and climate responsive design through..., water conservation and the use of sustainable drainage systems.</p> <p>Reasoned justification: 5.23 The introduction of the Sustainable Drainage Scheme (SuDS) consenting regime in early 2019 will make the inclusion of SuDS in all development of over 100m<sup>2</sup> or for 2 or more dwellings mandatory. Early consideration to the design layout requirement for SUDS should be given.</p>
GN 3 Infrastructure and New Development	<p>Policy: Measures necessary to physically deliver a development and ensure that it is acceptable in planning terms will be required in the first instance. Where appropriate contributions may be sought for a range of purposes, including ...11.Water, Wastewater Treatment and Sewerage Infrastructure.</p>
GN 35 Marinas	<p>Reasoned Justification: 5.190.... These aspects of development proposals will frequently require Environmental Impact Assessment. Some such projects may also require Habitats Regulations Assessment..</p>

5.8 Policy Reference	7.9 Text/Policy or Reasoned Justification
GN 41 Protection of National Statutory Environmental Designations	<p>Policy: 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 (HRA).</p> <p>Reasoned Justification: 5.239 Habitats Regulation Assessment -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).</p> <p>5.240 Proposals likely to have a direct or indirect adverse effect on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites must be subject to Habitats Regulation Assessment (HRA). Development requiring HRA will only be permitted where it can be determined that the proposal would not result in adverse effects on the species or integrity of the habitat or site, either alone, or in combination with other plans or projects.</p> <p>5.241 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.</p>

**New Recommended Additional Mitigation for Phosphate Issues**

- 5.64 The tables below summarise the mitigation required in Local Development Plan 2 policies to reflect the findings of this Habitats Regulations Assessment alongside the ‘Practical planning guidance to support development, particularly the delivery of affordable housing, in Special Areas of Conservation river catchments affected by phosphorus’ PRACTICAL GUIDANCE FOR PUBLIC AUTHORITIES December 2024.
- 5.65 Policy wording edits are set out in Appendix D to this Habitats Regulations Assessment and a summary of each Policy edit can be found in **New** Table 35’ below. To be an appropriate restriction enabling the plan-making body to ascertain no adverse effect on the integrity of a European site the restriction is made case specific, explicit and added to the policy wording.
- 5.66 **New** The reasons for the edits are set out below.
- 5.67 **New Key Policies:** There are key policies where the Plan needs to explicitly flag the need to address nutrient issues at an early stage, and by doing so:
  - a. enabling the infrastructure and mitigation required to be planned and delivered in a way that avoids the development having to be refused

permission at project stage because of its effects on the European site.

- b. and, particularly with strategic policies, there is a need to ensure that any tensions between the strategic policy expectation for the delivery of targets and the more detailed policies of the Plan which enable delivery and will be addressing nutrient issues on a case-by-case basis are resolved by flagging in the strategic policies that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported. The strategic drive to deliver targets cannot override this requirement.

5.68 **New Fair Share (Integrated Approach)/Nutrient Neutrality:** The Nutrient Management Board highlights where urgent action is needed to address phosphate issues in each sub-catchment. Developer contributions can play a role here. This element of the Nutrient Management Plan requires further exploration as set in paragraphs 5.40 to 5.62 above Policy SP 12A (formerly Policy GN 47) Water Quality and Protection of Water Resources as proposed for amendment reflects this fair share/integrated approach. It also recognises that where such an approach cannot be secured then proposals would be subject to delay. Where proposals wish to come forward in advance then nutrient neutrality would be required. Policy GN 3 Infrastructure and New Development as proposed for amendment will also advise that the need to ensure that proposals provide the required mitigation to meet Policy 12 A (formerly Policy GN 47) Water Quality and Protection of Water Resources will be considered to be an 'overwhelming need' within the terms of this policy. This will mean that the requirements to ensure that mitigating an anticipated adverse effect on the integrity of a site of national nature conservation importance cannot be a planning obligation that can be negotiated away because of viability.

5.69 **New Permit Reviews:** Following liaison with representatives of DCWW, it has been established 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. Housing sites are also shown as being phased in the Local Development Plan 2. Edits are proposed to the Plan which show where and when the anticipated permit reviews will take place. This is now proposed for flagging in the Local Development Plan 2 in an Appendix to the LDP (see Appendix D to this HRA) so that these anticipated milestones are highlighted for the proposal to be considered against the Policy framework of Policy 12A Water Quality and Water Resources. Phasing of housing development is required to match the delivery of anticipated Sewage Treatment Work improvements so that the phosphate loadings are as anticipated by both Dwr Cymru and by NRW to be in sync with the fair share/integrated approach to development. Other policies of the Plan are not phased but would still need to work in tandem with Policy 12 A Water Resources and Water Quality. Nutrient issues are flagged in the relevant policies and for the relevant site allocations/designations. The edits flag that there may be a need to delay development or require nutrient neutrality where planned improvements have not taken place as anticipated.

5.70 **New** The Nutrient Management Plan for Afonydd Cleddau advises at 3.4.1:

*'Development: The population in the Cleddau and Pembrokeshire Coastal Rivers region is set to decrease from 167,995 (in the year of publication) to 134,000 by 2050 . In theory, this should ease the pressure on existing WwTWs, and lead to an overall net decrease in P to the Cleddau catchment from them. However, there is still planned growth within the LPA's Local Development Plans (LDP). Therefore, it is important to recognise that the location of major urban developments is critical to the apportionment of P impacts. For example, major developments in localised areas can create pressure points for any receiving WwTWs, leading to localised increases in phosphorus loading. Whilst a great deal of work has been done to recognise future pressures on WwTWs, and DCWW are investing in improvements to their works to enable development to take place, it should be noted that future concentrations of development (i.e., beyond the current LDP) do pose a pressure to the sustainable management of nutrients in the Cleddau catchments. Forward planning and collaboration between the LPAs and DCWW will be key to controlling this pressure.'*

5.71 **New On-site SuDS for Phosphates**<sup>43</sup>: To ensure that onsite mitigation can be achieved edits are proposed to require (Policy 12A (formerly Policy GN 47) Water Quality and Protection of Water Resources) enhanced SuDS treatment being included in phosphate (and nitrogen) affected areas (See Appendix D). In terms of using SuDS to reduce phosphorous in surface water runoff C808 [Use of SuDS to reduce phosphorus in surface water runoff](https://epg-ltd.co.uk/wp-content/uploads/2024/03/c808-using-suds-to-reduce-phosphorus-in-surface-water-runoff-psg-1.pdf) <https://epg-ltd.co.uk/wp-content/uploads/2024/03/c808-using-suds-to-reduce-phosphorus-in-surface-water-runoff-psg-1.pdf> provides guidance on what forms of SuDS works best – pages 24 to 26. The guidance advises that using three stages for treatment produces the most results and gives examples at 3.3.3 where Train 1: pervious paving discharging into swale discharging into pond gives a mean removal of 51%.... Ponds are seen as the best method for dealing with this pollution.

5.72 Policy GN 2 Sustainable Design and Placemaking is also proposed for amendment regarding the need for planning applications, which require phosphate and/or nitrogen mitigation design details for onsite SuDS being used as phosphate and/or nitrogen mitigation, to be reviewed, confirmed and secured prior to the determination of the application. The application must include details for maintenance and monitoring to demonstrate how SuDS features will be maintained in perpetuity. This information needs to be specific to the use of SuDS in reducing phosphate and nitrogen runoff, separate to the normal requirements for flood risk.

5.73 **New** With these edits the LDP will have no adverse effect on the integrity of the Cleddau and Teifi riverine SACs.

### **New** Table 35 Summary of edits needed to the Local Development Plan policies for Phosphates

<b>Policies where mitigation is provided by edits to Policy 12A (formerly Policy GN 47)</b>
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<sup>43</sup> Construction Industry Research and Information Association [CIRIA] <https://epg-ltd.co.uk/wp-content/uploads/2024/03/c808-using-suds-to-reduce-phosphorus-in-surface-water-runoff-psg-1.pdf>

SP 03 – Affordable Housing Target  
 SP 11 – Countryside  
 SP 12 – Maintaining and Enhancing the Environment  
 SP 16 - Retail Hierarchy  
 SP 17 - Visitor Economy  
 SP 20 – Transport Infrastructure and Accessibility  
 GN 02 – Sustainable Design  
 GN 04 – Resource Efficiency and Renewable and Low-carbon Energy Proposals  
 GN 05 – Renewable Energy -target and allocations  
 GN 08 – Employment Proposals  
 GN 11 – Protection of Employment Sites and Buildings  
 GN 12 – Extensions to Employment Sites  
 GN 13 – Residential Development  
 GN 14 – Replacement Dwellings in the Countryside  
 GN 21 – Exception Sites for Local Needs Affordable Housing  
 GN 22 – Specialist and Supported Accommodation  
 GN 28 - Protection and Enhancement of the Historic Environment  
 GN 29 – Community Facilities  
 GN 31 – Retail and Commercial Centre Development  
 GN 32 – Out-of-Centre Retail and Commercial Development  
 GN 33 – Farm Diversification  
 GN 34 – Conversion or Change of Use of Agricultural Buildings  
 GN 35 – Marinas  
 GN 36 – Transport Routes and Improvements – Part 1  
 GN 37 – Working of Minerals – Part 1  
 GN 38 – Safeguarding and Prior Extraction of the Mineral Resource  
 GN 39 – Secondary Aggregates and Recycled Waste Minerals  
 GN 53 – Community Growing Spaces  
 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 60 – Disposal of Waste on Land

**Mitigation Proposed: A detailed edit of Policy GN 47 Water Quality and Protection of Water Resources is proposed to ensure that adequate protection is given to water quality issues arising from ongoing monitoring work being carried out in Special Areas of Conservation in the Plan area. Proposals will require careful consideration and compliance with this key Policy, i.e. Policy GN 47.**

The mitigation required to other strategic and general policies of the Plan listed above would necessitate a cross **reference to Policy GN 47, as proposed for amendment.**

Given the significance of the implications of the Policy GN 47 requirement it is proposed to elevate Policy GN 47 to become a strategic policy of the Plan to be

identified as Policy SP12a Water Quality and Protection of Water Resources. The edits proposed to Policy GN 47 (to be renamed Policy 12a) regarding phosphates will:

- highlight that where housing development either allocated sites or commitments or windfall sites are affected by nutrient issues and the ‘fair share’ approach is being taken then to grant permission the planning authority will need to have evidence regarding appropriate steps being secured and implemented to avoid deterioration.
- Sets out that where such steps have not been secured or taken then applicants can expect permissions to be delayed.
- Provide **for mitigation measure that can be taken by the applicant and then for the need for the Council to be satisfied that the identified mitigation will avoid adverse effects on the integrity of the SAC.**
- Include specific requirements regarding SuDS to achieve maximum removal of phosphates (and nitrogen) on site.

Notwithstanding this there are key policies where the Plan needs to explicitly flag up the water quality issue at an early stage, so enabling the infrastructure and mitigation to be planned and delivered in a way that avoids the development having to be refused permission at project stage because of its effects on the European site. These policies are commented upon below.

<p><b>SP 2 Housing Requirement</b></p>	<p>As the delivery of a particular tranche of housing development in a particular location would exacerbate water pollution problems in a European site, it would be beneficial to add a restriction on the policy provision for the housing which prohibit permissions being given that would result in an adverse effect on the integrity of sites of national nature conservation importance.</p> <p>The advantage is that the plan flags up the water quality issue at a strategic level, and at an early stage, so enabling the infrastructure to be planned and delivered in a way that avoids the housing development having to be refused permission at project stage because of its effects on the European site.</p> <p>The main policy wording is proposed for editing along with some additional explanatory paragraphs being added to the reasoned justification. The approach will also address any tensions assumed between the strategic policy expectation for the delivery of the housing land supply and the more detailed policies of the Plan.</p> <p>The re-wording flags:</p> <ul style="list-style-type: none"> <li>▪ that applications that can’t rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported.</li> <li>▪ Those policies of the Plan where more detail can be found on what sites and allocations are affected – set out in the reasoned justification.</li> </ul>
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	<ul style="list-style-type: none"> <li>▪ That ascertaining whether the permission can be granted in these affected areas is dependant on, in the case of phosphates, whether certain delivery milestones have been achieved – set out in the reasoned justification.</li> </ul>
<b>SP 4 Gypsy, Traveller and Show-people's Accommodation</b> <b>SP 5 Supporting Prosperity</b>	<p>The Policy re-wordings flags that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported.</p> <p>As strategic policies there is a need to ensure that any tensions between the strategic policy expectation for the delivery of gypsy traveller accommodation and employment land and the more detailed policies of the Plan which will be addressing nutrient issues on a case-by-case basis are resolved.</p>
<b>SP 08 - Regional Growth Areas</b> <b>SP9: Service Centres and Service Villages</b>	<p>Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are settlements where potentially nutrient issues may arise. Settlements are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing.</p>
<b>SP13: Port and energy-related Development and Celtic Freepport</b>	<p>Elevate paragraph 4.8 of the reasoned justification to the main policy wording and ensure the Policy rewording flags that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported.</p> <p>There is a need to ensure that any tensions between the strategic policy expectation for the delivery of employment land and the more detailed policies of the Plan which will be addressing nutrient issues on a case-by-case basis are resolved.</p>
<b>SP 14 Strategic Employment Provision</b> <b>SP 15 Safeguarding of existing Strategic Employment Sites</b> <b>GN 9 Employment Allocations</b>	<p>The Policy re-wording flags that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported.</p> <p>As a strategic policy there is a need to ensure that any tensions between the strategic policy expectation for the delivery of the employment land and the more detailed policies of the Plan which will be addressing nutrient issues on a case-by-case basis are resolved.</p> <p>The policy can also identify sites listed where there are phosphorous (and nitrogen) issues that need to be addressed so expectations are clear.</p>
<b>GN 2 Sustainable Design</b>	<p>Include reference to water quality issues with a cross reference to Policy GN 47 in paragraph 5.23 of the reasoned justification.</p>

<p><b>GN 3 Infrastructure and New Development</b></p>	<p>Add the words '(including water quality)' after the word 'Water' in criterion 11. Add a paragraph to the end of the reasoned justification: <i>The need to ensure that proposals provide required mitigation to meet Policy GN 47 Water Quality and Protection of Water Resources will be considered to be an 'overwhelming need' within the terms of this policy.</i> (See</p> <p>The purpose of this policy is to ensure that where development requires planning obligations to be acceptable in planning terms then the obligations required will be prioritised. Given the fact that permissions will not be granted if it would result in an adverse effect on the integrity of sites of national nature conservation importance then it would also follow that in order to ensure the site can be released the provision of mitigation in relation to nutrients will have to be a priority.</p>
<p><b>GN 10 Mixed-Use Proposals GN 13 – Residential Development</b></p>	<p>Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.</p> <p>Additional text is included to flag up front for the applicant that there may be additional requirements for phosphates and/or (nitrogen) in some locations.</p>
<p><b>GN 16 Residential Allocations</b></p> <p><b>GN 17 Residential Commitments</b></p>	<p>Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.</p> <p>Additional text is included to flag up front for the applicant that there are additional requirements for phosphates and/or nitrogen.</p> <p>Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).</p> <p>Sites or phases of sites dependant on WwTW permit reviews are suffixed with '**'</p> <p>Sites requiring phosphorous or nitrogen mitigation are suffixed 'P' or 'N' respectively</p>
<p><b>GN 23 Specialist and Supported Accommodation Allocations</b></p> <p><b>GN 24 Gypsy and Traveller Site Allocations</b></p>	<p>Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.</p> <p>Additional text is included to flag up front for the applicant that there are additional requirements for phosphates and/or (nitrogen).</p> <p>Of particular concern are sites where identified where there are potentially nutrient issues arising. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote</p>

<p><b>GN 25 Gypsy and Traveller Sites and Pitches</b></p> <p><b>GN 30 Community Facilities Allocations</b></p> <p><b>GN 36 Transport Routes and Improvements</b></p> <p><b>GN 59 Waste Management Facilities</b></p>	<p>where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).</p>
<p><b>GN 38 – Safeguarding and Prior Extraction of the Mineral Resource</b></p>	<p>Criterion 2) has a typographical error contained in it which will require a Matters Arising Change. 'Extraction would <u>not</u> have an unacceptable impact on environmental or amenity considerations; or' *(see also Policy GN 47 commentary above)</p>
<p><b>GN 41 Protection of National Statutory Environmental Designations</b></p>	<p>Explicitly advise development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.</p>

## PS Background

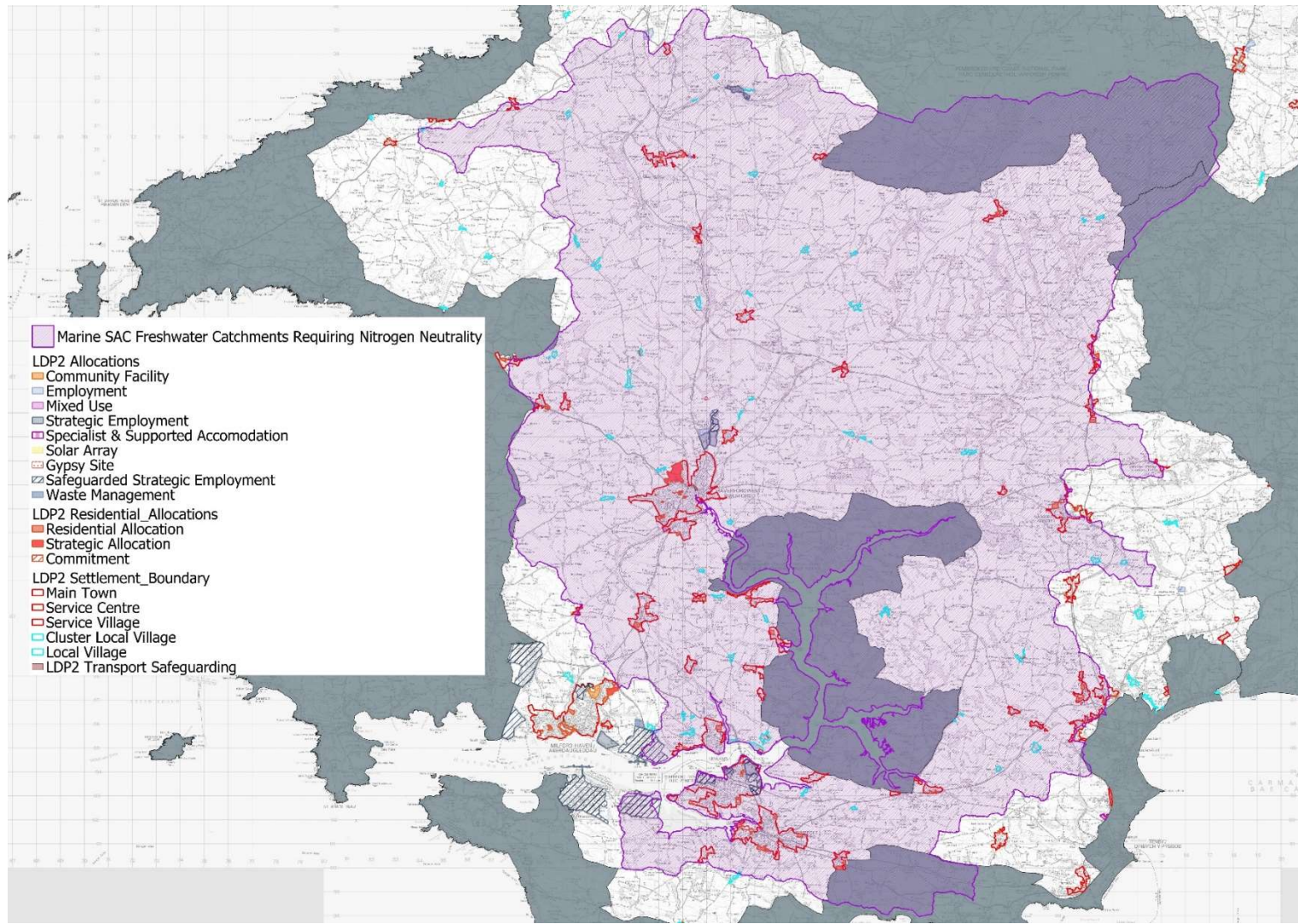
- 5.74 **PS** Natural Resources Wales (NRW) has published new evidence in June 2025 which contributes to Welsh Government's Nature Networks Programme to improve the condition, connectivity and resilience of protected sites.
- 5.75 **PS** Links to the various Condition Assessments for Welsh European marine sites and the associated Conservation Advice Packages can be found in the footer below<sup>44</sup>. These have been put in place to help Wales meet the obligations of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations)<sup>45</sup>. They have significant implications for land use planning in affected areas.
- 5.76 **PS** In a Pembrokeshire context, the condition of the Pembrokeshire Marine SAC has been found to be unfavourable and there is a high degree of confidence in the monitoring work undertaken here – hence this is one of the Marine SACs being prioritised for remedial actions, **although further technical work is needed to better understand the nature of the problem.**
- 5.77 **PS** Currently, NRW is not advising that nutrient neutrality should be applied as a blanket approach across the marine SACs in Wales. However, it is asking for **nutrient neutrality (for nitrogen)** in some of the Water Framework Directive sub-catchments, including the **Milford Haven Inner sub-catchment** and areas draining into this, which include the upstream freshwater SAC catchment of the Western and Eastern Cleddau.
- 5.78 **PS** In terms of geographical extent, the map below shows the extent of the area where nutrient neutrality for nitrogen is required. The extent of the affected areas shown must be treated with some caution, as the mapping may not reflect the complexities of hydrological connections / drainage pathways. There will be instances where drainage pathways take affected flows outside the catchment area and others where locations outside the catchment have drainage pathways into it. In some locations close to the edge of the affected areas, further local investigations will be needed to establish the nature of the drainage pathways and hence whether a development proposal is affected by nutrient neutrality requirements or otherwise. However, in most cases the situation will be clear from the outset.

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<sup>44</sup> <https://www.naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/condition-assessments-for-welsh-european-marine-sites-ems/?lang=en> - see in particular conditions assessments and conservation advice for Pembrokeshire Marine SAC, Cardigan Bay SAC, Carmarthen Bay SAC, Grassholm SPA, Carmarthen Bay SPA, Cardigan SPA <https://www.naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/condition-assessments-for-welsh-european-marine-sites-ems/?lang=en> <https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/conservation-advice-for-european-marine-sites/?lang=en>

<sup>45</sup> <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

**PS** Figure 5 Extent of area affected by Nitrogen advice from NRW



5.79 **PS** Natural Resources Wales advises on its website<sup>46</sup> regarding mitigation:

***What are the principles of nutrient neutrality***

*Development or water discharge permit applications for nutrient neutral developments must demonstrate that all of the following principles have been applied:*

- A. *Calculations must be based on best available scientific evidence and research, including key inputs and assumptions at the time of the Appropriate Assessment.*
- B. *Measures are effective and in place for the lifetime of the development/permitted activity effects, demonstrating how this will be secured, such as legal agreements.*
- C. *Evidence mitigation will be in place when proposed development becomes active. The nutrient neutrality mitigation must be in place and functioning when the proposed development or water discharge permit will start to discharge (directly or via a sewerage system) to the river. If the impact will be phased, it may be that a range of measures may be needed to address impacts over time.*
- D. *Mitigation must not compromise the restoration of the SAC. This means not constraining those measures already in place or which may be required in future to maintain or restore the SAC.*
- E. *Implementation of mitigation measures through nutrient neutrality should not undermine the objectives in the Habitat Regulations aimed at restoring the site to favourable condition. For example, where there are limited options of mitigation available these should be used to maintain or improve the site rather than to enable more discharges to the SAC river.*
- F. *Measures used to demonstrate Nutrient Neutrality must not be double counted. A national register of schemes is likely to be required in order to ensure no double counting occurs.*
- G. *Measures should, where possible, be within the development site. Where this is not achieved there must still not be detriment to the SAC. Permissions will not be granted unless the competent authority is satisfied that the SAC will not be impacted.*

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<sup>46</sup> <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/principles-of-nutrient-neutrality-in-relation-to-development-or-water-discharge-permit-proposals/?lang=en>

- H. *Development or water discharge permit proposals within a SAC river boundary will need to be mitigated at the site or upstream. Development affecting a watercourse that joins a SAC river boundary can have mitigation at the site, up or downstream providing the offsetting occurs before the point at which the development impacts the SAC boundary.*
- I. *Nutrient calculations must be based on precautionary principle. The uncertainty in the nutrient calculations is dealt with by taking a precautionary approach through the use of buffers. This will involve adding a percentage onto the calculation when using a nutrient calculator. This should provide the necessary level of confidence to ensure that new developments or permitting activities will not increase the nutrient load entering SAC rivers.*

5.80 **PS** Sites designated/allocated for development that discharge to a WWWT along with surface water draining outside the affected area were screened out.<sup>47</sup>

5.81 **PS** The following section showing those sites and allocations that are screened in and are extracted from Tables 10 to 14 of Position Statement on Natural Resources Wales Condition Assessment for Pembrokeshire Marine Special Area of Conservation (June 2025) - September 2025 - **SD12.1**. Screening regarding nitrogen of the LDPs introductory chapters etc., strategic and general policies can be found in Stage 1 HRA Screening.

5.82 **PS** In terms of screening in likely developments NRW advise (with the caveat that every development should be considered by Planning Authorities on a case-by-case basis) that where non-residential development leads to increases in nutrient discharges there are implications. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites. There may be cases where planning applications for new commercial or industrial developments, such as conference facilities, large retail sites or major tourist attractions could result in the release of additional nutrients into the river system. In such cases, further assessment is likely to be required to determine if the proposal will have an adverse effect on the integrity of the river or Marine SAC.

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<sup>47</sup> See Table 38 Policy GN 16 Housing Allocations Screening, Table 39 Policy GN 17 Residential Commitments Screening, Table 40 Other Allocations Screening, Table 41 Policy GN 36 Transport Routes Screening of Appendix 1 to the Council's Position Statement on Natural Resources Wales Condition Assessment for Pembrokeshire Marine Special Area of Conservation (June 2025) - **SD12.1**.

5.83 **PS** NRW advise that the following developments (which are relevant for the Plan’s policy approach) can be screened out as not likely to have a significant effect on a river SAC in relation to nutrient inputs, as there is unlikely to be a source of additional nutrients or pathway for impacts:

- developments intended to provide services, facilities, commercial sites, or places of employment (e.g., community buildings, schools etc.) for a local population already served by residential connections to existing public or private sewers discharging within the SAC river catchment.
- private sewage treatment systems discharging domestic wastewater to ground, built to the relevant British Standard (BS 6297:2007+A1:2008) having a maximum daily discharge rate of less than 2 cubic metres (m3) and where the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain and located more than 50m from a SAC boundary and at least 50m from any other known discharge to ground.

5.84 **PS** Screening regarding nitrogen of the LDPs introductory chapters etc., strategic and general policies can be found in Stage 1 HRA Screening. See Appendix B.2 for the full list of sites located in the catchment and their screening conclusions.

5.85 **PS** With regard to potential likely significant effects with nitrogen the table below provides an overall count of policies and allocations screened in and out in.

**New Table 36 Summary of Screening outcomes Nitrogen Milford Haven Inner sub-catchment**

Policies, Allocations, Commitments & Safeguarding Routes	Policy Ref	Screen In	Screen Out	Total
Introductory Section and Chapter 1 Context and Key Issues	See across	None	All	
Strategic Policies (excludes sites screened below)	See across	15	6	21
General Policies ( excludes sites screened below)	See across	35	15	50
Residential Allocations - count of sites	GN 16	38	17	55
Residential Commitments - count of sites	GN 17	20	46	66
Other Allocations (Policy GN 05, GN 09, GN 10, GN 23, GN 24, GN 30, GN 59, SP 14, SP 15) - count of sites	See across	31	15	46
Transport	GN 36	2	2	4
Totals		141	101	242

5.86 **PS** The Plan’s allocation policies screened in for further consideration are set out below.

**PS Allocation/Commitment Policies Screened in for Nitrogen**

**PS Table 37 Policy GN 16 Housing Allocations Category I Screening**

	LDP2_Reference	Site Name	Settlement
1.	HSG/029/00014	Opposite Woodholm Close	Crundale
2.	HSG/048/00038	North of Hayston View	Johnston
3.	HSG/052/00011	South of Cleggars Park	Lamphey
4.	HSG/063/00024	North of The Kilns	Llangwm
5.	HSG/093/00066	East of Poppy Drive	Neyland
6.	HSG/095/00144	North of Gibbas Way	Pembroke
7.	HSG/096/00238	North of Pembroke Road	Pembroke Dock
8.	HSG/120/00018	North West of Wesley Way	Spittal
9.	HSG/003/LDP2/1	North of Begelly Farm	Begelly
10.	HSG/022/LDP2/1	Land at Dungleddy Court	Clarboston Road
11.	HSG/152/LDP2/1	South of Bro'r Dderwen	Clunderwen
12.	HSG/029/LDP2/1	West of Ashford Park	Crundale
13.	HSG/040/LDP2/1	Former Education Centre, Dew Street	Haverfordwest
14.	HSG/043/LDP2/1	Adjacent to Brackenhurst	Hill Mountain
15.	HSG/046/LDP2/1	Land at West End Cottages	Hundleton
16.	HSG/047/LDP2/1	South of The Crown	Jeffreyston
17.	HSG/048/LDP2/1	Maes yr Ysgol	Johnston
18.	HSG/049/LDP2/1	East of Brookfield Close	Keeston
19.	HSG/050/LDP2/1	South of Rock Park	Kilgetty
20.	HSG/052/LDP2/1	Adjacent to Lamphey School	Lamphey
21.	HSG/053/LDP2/1	Between Longstone Court and 62, St. Davids Road	Letterston
22.	HSG/060/LDP2/1	Adjacent to Maesybryn	Llandissilio
23.	HSG/066/LDP2/1	East of Hazelbank	Llanstadwell
24.	HSG/081/LDP2/1	West of Globe Inn	Maenclochog
25.	HSG/088/LDP2/1	West of Bloomfield Gardens and North of Adams Drive & Highfield Park	Narberth
26.	HSG/095/LDP2/1	Between St Daniels Hill & Norgans Hill	Pembroke
27.	HSG/096/LDP2/1	Land at Hampshire Drive	Pembroke Dock
28.	HSG/113/LDP2/01	South of Robeston Court	Robeston Wathen
29.	HSG/119/LDP2/1	Between Cornerways and Austalise	Simpson Cross

	LDP2_Reference	Site Name	Settlement
30.	HSG/135/LDP2/1	North of Bulford Road Bypass	Tiers Cross
31.	HSG/149/LDP2/1	Land at Ford Farm	Wolfscastle
32.	HSG/095/LDP2/2	South West of Southlands, St. Daniels Hill	Pembroke
33.	HSG/096/LDP2/2	West of Stranraer Road	Pembroke Dock
34.	HSG/040/LDP2/3	Rear of 76 Pembroke Road	Merlins Bridge
35.	HSG/096/LDP2/3	Land south of Sycamore Woods and west of Lavinia Drive	Pembroke Dock
36.	HSG/095/LDP2/4	East of Golden Hill Road	Pembroke
37.	HSG/095/LDP2/5	South East of Southlands St.Daniels Hill	Pembroke
38.	S/HSG/040/LDP2/6	Slade Lane	Haverfordwest
39.	HSG/086/LDP2/7	North East of Beaconing, Steynton	Milford Haven

**PS Table 38 Policy GN 17 Housing Commitments –**

	Allocation Name	LDP Reference	Site Total	Units under construction	Commitment Units Remaining in plan period (NS only)	Screen In Unit No.
1.	Calvary Church	040/00373	8	0	8	8
2.	Snooker Club	040/00430	16	0	8	8
3.	Land N of Cleddau Bridge Hotel	096/00274	5	1	<u>3</u>	3
4.	Land N of Cleddau Bridge Hotel	096/00375	14	0	7	7
5.	Green Haven, Monkton	095/00180	30	0	11	11
6.	Springfield	095/00240	5	0	2	1
7.	Rushacre Gardens	088/00077	54	0	27	1
8.	Dingle Farm	088/00074	33	0	16	16
9.	North of New Road	003/00040	70	0	35	35
10.	South of Tinker's Fold	025/00028	6	<u>1</u>	<u>2</u>	5
11.	Dingle Lane	029/00013	40	0	1	1
12.	Woodholm	029/00026	5	1	2	3

	Allocation Name	LDP Reference	Site Total	Units under construction	Commitment Units Remaining in plan period (NS only)	Screen In Unit No.
	Farm					
13.	Leven Close	044/00050	13	0	1	1
14.	Cyfin Barn Farm	044/00063	11	<u>0</u>	3	4
15.	Harcourt Close	044/00015	40	<u>9</u>	<u>0</u>	5
16.	Maes Roslyn	081//LDP/01	13	0	13	4
17.	Sageston Fields	015/00022	38	0	<u>3</u>	7
18.	Barnlake Point	154/00001	22	1	10	10
19.	Hawn Lake	011/00011	13	0	1	1
20.	Land to the S of Kiln Park	012/00004	<u>7</u>	<u>2</u>	<u>2</u>	2

**PS Table 39 Other Allocations**

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
GN 05	SPV/149/LDP2/01	Solar Array	Ford Farm, Wolfscastle	Wolfscastle	Pembrokeshire Marine inner - (via riverine Cleddau)	Screened in as a precautionary
GN 05	SPV/066/LDP2/01	Solar Array	East of Hazelbank, Llanstadwell	Llanstadwell	Pembrokeshire Marine inner- directly (Cleddau)	Screened in as a precautionary
GN 09	EMP/034/00006	Employment	Celtic Link Business Park, Scleddau	Scleddau	No public sewerage. Crosses watershed - Either West Wales Marine via Goodwick Brook or Pembrokeshire Marine inner - (via riverine Cleddau)	No public sewerage. Crosses watershed. I
GN 09	EMP/040/LDP2/01	Employment	Withybush Showground	Crundale/ Haverfordwest	Pembrokeshire Marine inner - (via riverine Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.
GN 09	EMP/053/00001	Employment	Old Station Yard, Letterston	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)	
GN 09	EMP/088/LDP/01	Employment	Rushacre Enterprise Park Extension Narberth	Narberth	Pembrokeshire Marine inner - (via riverine Cleddau)	
GN 09	EMP/093/00001	Employment	North of Honeyborough Industrial Estate	Neyland	Pembrokeshire Marine inner - directly (Cleddau)	
GN 09	EMP/132/LDP2/01	Employment	South of KP Thomas & Sons	Templeton	No public sewerage. Crosses watershed - Either Pembrokeshire Marine inner - (via riverine Cleddau) or Carmarthen Bay and	No public sewerage. Crosses watershed

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
					Estuaries	
GN 10	MXU/095/LDP2/01	Mixed Use	South Quay	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Work concerning Castle Terrace is caught as amendment application is with the authority.
GN 23	SSA/135/LDP2/01	Supported Accommodation	North of Bulford Road Bypass, Tiers Cross	Tiers Cross	Pembrokeshire Marine inner - directly (Cleddau)	Inside catchment but sewered connection flows outside (include for SUDS)
GN 23	SSA/088/LDP2/01	Supported Accommodation	Redstone, Narberth	Narberth	Pembrokeshire Marine inner - directly (Cleddau)	Crosses watershed
GN 24	GT/003/LDP2/01	Gypsy Site	West of Kingsmoor Common Gypsy and Traveller site	Kilgetty	Pembrokeshire Marine inner - (via riverine Cleddau)	
						There are no public sewers in close proximity and the site lies within the catchment of Cleddau Rivers SAC.  A private treatment system will need to be provided in line with NRW advice. This could be achieved by replacing the septic tank serving the existing site, as new packaged treatment plants can often demonstrate lower
GN 24	GT/040/LDP2/01	Gypsy Site	East of Withybush Gypsy and Traveller site	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
						nutrient outputs with higher foul flows compared to existing septic tanks.
GN 24	GT/095/LDP2/2	Gypsy Site	South of Monkton Playing Fields	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	
GN 59	EMP/146/00001	Waste Management	Waterston Industrial Estate	Llanstadwell	Pembrokeshire Marine - directly (Cleddau)	Outside area but if connects to sewerage area then will flow in.
SP 14	S/EMP/136/00001	Strategic Employment	Former RNAD Site, Trecwn	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)	The current WwTW in this area is unlikely to have capacity to serve any redevelopment of any significant scale on this site – a new (private) WwTW would therefore be needed.
SP 14	S/EMP/040/00001	Strategic Employment	Withybush cluster (West Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner- directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.
SP 14	S/EMP/040/00004	Strategic Employment	Withybush cluster (Trading Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner- directly (Cleddau)	Site will need service extensions to connect into existing public sewerage

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
						systems. NRW are requiring this at Withybush.
SP 14	S/EMP/040/00005	Strategic Employment	Withybush cluster (East of Lodge Estate)	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.
SP 14	S/EMP/096/00001	Strategic Employment	Pembrokeshire Science & Technology Park cluster	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems.
SP 15	S/EMP/096/00007	Safeguarded Strategic Employment	Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/096/00006	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock (Waterloo & London Road)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/000/00004	Safeguarded Strategic Employment	Waterston Tank Farm, Dragon LNG, Milford Haven	Milford Haven	Pembrokeshire Marine inner - if sewerage to Waterston Works it would flow directly into Pembrokeshire Marine inner (Cleddau)	Waterston Tank Farm and LNG, Milford Haven – likely to deal with most of its own waste generation on site.
SP 15	S/EMP/096/00005	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock cluster (Kingswood)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
						on this.
SP 15	S/EMP/096/00004	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock cluster (Ferry Lane)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/096/00003	Safeguarded Strategic Employment	Pembroke Dock cluster (West Llanion)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/040/00011	Safeguarded Strategic Employment	Withybush cluster (East Estate)	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.
SP 15	S/EMP/040/00012	Safeguarded Strategic Employment	Withybush cluster (North Estate)	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.
SP 15	S/EMP/040/00015	Safeguarded Strategic Employment	Withybush cluster (Lodge Estate)	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
SP 15	S/EMP/096/00002	Safeguarded Strategic Employment	Pembroke Dock cluster (Royal Dockyard)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/095/00001	Safeguarded Strategic Employment	Pembroke Power Station	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Pembroke Power Station – likely to deal with most of its own waste generation on site.

**PS Table 40 'Road Schemes Policy GN 36**

Reference	Scheme Name	Location	Notes
TS/LDP2/03	Well Hill improvement, Pembroke	Well Hill - Pembroke	Within the catchment area
TS/LDP2/05	Haverfordwest public transport interchange	Haverfordwest Train Station	Within the catchment area

**PS Nitrogen Loads**

5.87 **PS** In terms of the proposals coming forward under Local Development Plan 2 the following tables provides an estimate of nitrogen loading where such a calculation was feasible (i.e. for housing allocations and for residential commitments). Given that the implications of wastewater treatment for non-housing sites are uncertain non-housing sites will need to be considered on a case-by-case basis in terms of likely implications.

**PS Table 41 Settlement - Housing Allocations (Policy GN 16) Estimated sum of Nitrogen Budget**

Row Labels	Sum of Total Units to be delivered in Plan period	Sum of Nitrogen budget + 20% buffer: kg TN/year will be generated
Begelly	46	180.23
Clarbeston Road	19	80.06
Clunderwen	31	119.96
Crundale	37	134.94
Haverfordwest	445	1555.31
Hill Mountain	15	52.22
Hundleton	14	47.51
Jeffreyston	10	96.79
Johnston	63	276.15
Keeston	27	98.32
Kilgetty	19	59.9
Lamphey	95	334.26
Letterston	38	134.27
Llandissilio	26	81.97
Llangwm	66	250.81
Llanstadwell	10	35.32
Maenclochog	15	73.44
Milford Haven	14	1.79
Narberth	89	301.6
Neyland	101	330.8
Pembroke	2855	966.6666-66

Row Labels	Sum of Total Units to be delivered in Plan period	Sum of Nitrogen budget + 20% buffer: kg TN/year will be generated
Pembroke Dock	139	476.94
Robeston Wathen	5	44.86
Simpson Cross	18	60.35
Spittal	10	37.81
Tiers Cross	6	1.02
Wolfscastle	14	49.66
<b>Grand Total</b>	<b>1657</b>	<b>5882.95</b>

5.88 **PS** Applying an overall estimated 30%<sup>48</sup> reduction for SuDS incorporation this load can be reduced to an estimated 5133.04 kg. There is insufficient detail available to apply a tailored figure for SuDS incorporation on individual sites at this point.

**New** Table 42 Housing Allocations – Nitrogen Budget (Policy GN 16) -

	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Nitrogen budget + 20% buffer: kg TN/year will be generated
1	HSG/040/LDP2/1	Former Library Dew Street	Haverfordwest	22	<b>76.16</b>
2	S/HSG/040/LDP2/6	Slade Lane*	Haverfordwest	<u>372</u>	<u>1312.12</u>
3	HSG/040/LDP2/3	Rear of 76 Pembroke Road, Merlins Bridge	Haverfordwest	51	<b>167.03</b>
4	HSG/096/LDP2/1	Land at Hampshire Drive	Pembroke Dock	33	<b>128.82</b>
5	HSG/096/LDP2/2	West of Stranraer Road, Pennar	Pembroke Dock	59	<b>193.27</b>
6	HSG/096/00238	North of Pembroke Road	Pembroke Dock	38	<b>125.35</b>
7	HSG/096/LDP2/3	Land south of Sycamore Woods and west of Lavinia Drive	Pembroke Dock	9	<b>29.5</b>
8	HSG/095/LDP2/1	Between St Daniels Hill & Norgans Hill	Pembroke	147	<b>481.33</b>
9	HSG/095/LDP2/2	SW of Southlands, St. Daniels Hill	Pembroke	19	<b>69.37</b>
10	HSG/095/LDP2/4	East of Golden Hill Road	Pembroke	50	<b>184.81</b>
11	HSG/095/LDP2/5	SE of Southlands, St. Daniels Hill	Pembroke	26	<b>85.15</b>
12	HSG/095/00144	North of Gibbs Way	Pembroke	<u>433</u>	<u>146146</u>

<sup>48</sup> For nitrogen, the publication 'Construction Industry Research and Information Association [CIRIA] (2023) refers to using SuDS to reduce nitrogen in surface water runoff' and advises in Chapter 8 that 'Where the SuDS management trains described in Option 1 and 2 (Sections 7.1 and 7.2) are designed in accordance with CIRA C753 and where full treatment is provided for all sub annual rainfall events, these schemes can be considered to capture and remove 30% of the nitrogen in the run off from the development as an average over the year.'

	<b>LDP 2 Reference</b>	<b>Site Name</b>	<b>Settlement</b>	<b>Total Units to be delivered in Plan period</b>	<b>Nitrogen budget + 20% buffer: kg TN/year will be generated</b>
13	HSG/088/LDP2/1	North of Highfield Park & Parc Roberts	Narberth	89	301.6
14	HSG/093/00066	East of Poppy Drive	Neyland	101	330.8
15	HSG/048/00038	North of Hayston View	Johnston	50	233.06
16	HSG/048/LDP2/1	Maes yr Ysgol	Johnston	13	43.09
17	HSG/050/LDP2/1	South of Rock Park, Kilgetty	Kilgetty	19	59.9
18	HSG/052/00011	South of Cleggars Park	Lamphey	55	182.27
19	HSG/052/LDP2/1	Adjacent to Lamphey School	Lamphey	40	151.99
20	HSG/053/LDP2/1	Between Longstone Court and 62, Station Road	Letterston	38	134.27
21	HSG/063/LDP2/1	North of The Kilns	Llangwm	66	250.81
22	HSG/003/LDP2/1	North of Begelly Farm	Begelly	46	180.23
23	HSG/022/LDP2/1	Land at Dungleddy Court	Clarbeston Road	19	80.06
24	HSG/152/LDP2/1	South of Bro'r Dderwen	Clunderwen	31	119.96
25	HSG/029/00014	Opposite Woodholm Close	Crundale	15	57.61
26	HSG/029/LDP2/1	West of Ashford Park	Crundale	22	77.33
27	HSG/043/LDP2/1	Adjacent to Brackenhurst	Hill Mountain	15	52.22
28	HSG/046/LDP2/1	Land at West End Cottages	Hundleton	14	47.51
29	HSG/047/LDP2/1	South of The Crown	Jeffreyston	10	96.79
30	HSG/049/LDP2/1	East of Brookfield Close	Keeston	27	98.32
31	HSG/060/LDP2/1	Adjacent to Maesybryn	Llandissilio	26	81.97
32	HSG/066/LDP2/1	East of Hazelbank	Llanstadwell	10	35.32
33	HSG/081/LDP2/1	West of Globe Inn	Maenclochog	15	73.44
34	HSG/113/LDP2/1	South of Robeston Court	Robeston Wathen	5	44.86
35	HSG/119/LDP2/1	Land between Cornerways and Austalise	Simpson Cross	18	60.35
36	HSG/120/00018	NW of Wesley Way	Spittal	10	37.81
37	HSG/149/LDP2/1	Land at Ford Farm	Wolfscastle	14	49.66
38	HSG/135/LDP2/1	North of Bulford Road Bypass	Tiers Cross	6	1.02
39	HSG/086/LDP/7	Land NE Beaoning, Steynton	Milford Haven	14	1.79
		<b>TOTALS</b>		<b>1657</b>	<b>5882.95</b>
				30% SuDS reduction	<b>5133.04</b>
*Slade Lane Phase 1 discounted from figures. Screened out as all pre-commencement conditions discharged/approved for this phase.					

## New Table 43 Phasing Budget - Housing Allocations (Policy GN 16) - Nitrogen Budget

LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033	Nitrogen load +20% buffer (surface water inc)
HSG/040/LDP2/1	Former Library Dew Street	Haverfordwest	22	0.00	0.00	0.00	76.16	0.00	0.00	0.00	0.00	0.00	76.16
S/HSG/040/LDP2/6	Slade Lane	Haverfordwest	372	0.00	0.00	253.96	253.96	186.94	144.62	123.45	176.36	172.83	1312.12
HSG/040/LDP2/3	Rear of 76 Pembroke Road, Merlins	Haverfordwest	51	0.00	0.00	0.00	65.50	65.50	36.03	0.00	0.00	0.00	167.03
HSG/096/LDP2/1	Land at Hampshire Drive	Pembroke Dock	33	0.00	0.00	15.61	19.52	19.52	19.52	19.52	19.52	15.61	128.82
HSG/096/LDP2/2	West of Stranraer Road, Pennar	Pembroke Dock	59	0.00	0.00	0.00	0.00	45.86	49.14	49.14	49.14	0.00	193.27
HSG/096/00238	North of Pembroke Road	Pembroke Dock	38	0.00	26.39	26.39	26.39	26.39	19.79	0.00	0.00	0.00	125.35
HSG/096/LDP2/3	Land south of Sycamore Woods and west of Lavinia Drive	Pembroke Dock	9	0.00	0.00	13.11	16.39	0.00	0.00	0.00	0.00	0.00	29.50
HSG/095/LDP2/1	Between St Daniels Hill & Norgans Hill	Pembroke	147	0.00	0.00	0.00	98.23	98.23	98.23	98.23	88.41	0.00	481.33
HSG/095/LDP2/2	SW of Southlands, St. Daniels Hill	Pembroke	19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	36.51	32.86	69.37
HSG/095/LDP2/4	East of Golden Hill Road	Pembroke	50	0.00	0.00	36.96	55.44	55.44	36.96	0.00	0.00	0.00	184.81
HSG/095/LDP2/5	SE of Southlands, St. Daniels Hill	Pembroke	26	0.00	0.00	0.00	0.00	0.00	0.00	32.75	52.40	0.00	85.15
HSG/095/00144	North of Gibbas Way	Pembroke	43	0.00	16.98	16.98	16.98	16.98	16.98	16.98	16.98	27.16	146.00
HSG/088/LDP2/1	North of Highfield Park & Parc Roberts	Narberth	89	0.00	37.28	67.78	67.78	67.78	61.00	0.00	0.00	0.00	301.60
HSG/093/00066	East of Poppy Drive	Neyland	101	0.00	0.00	32.75	65.50	65.50	65.50	65.50	36.03	0.00	330.80
HSG/048/00038	North of Hayston View	Johnston	50	0.00	69.92	69.92	69.92	23.31	0.00	0.00	0.00	0.00	233.06
HSG/048/LDP2/1	Maes yr Ysgol	Johnston	13	0.00	0.00	19.89	23.20	0.00	0.00	0.00	0.00	0.00	43.09
HSG/050/LDP2/1	South of Rock Park, Kilgetty	Kilgetty	19	0.00	0.00	15.76	22.07	22.07	0.00	0.00	0.00	0.00	59.90
HSG/052/00011	South of Cleggars Park	Lamphey	55	0.00	49.71	49.71	33.14	49.71	0.00	0.00	0.00	0.00	182.27
HSG/052/LDP2/1	Adjacent to Lamphey School	Lamphey	40	0.00	0.00	0.00	0.00	30.40	30.40	30.40	30.40	30.40	151.99
HSG/053/LDP2/1	Between Longstone Court and 62, Station	Letterston	38	0.00	0.00	0.00	0.00	28.27	35.33	35.33	35.33	0.00	134.27
HSG/063/LDP2/1	North of The Kilns	Llangwm	66	38.00	57.00	57.00	57.00	41.80	0.00	0.00	0.00	0.00	250.81
HSG/003/LDP2/1	North of Begelly Farm	Begelly	46	0.00	0.00	0.00	23.51	31.34	31.34	31.34	31.34	31.34	180.23
HSG/022/LDP2/1	Land at Dungleddy Court	Clarboston Road	19	0.00	0.00	25.28	29.50	25.28	0.00	0.00	0.00	0.00	80.06
HSG/152/LDP2/1	South of Bro'r Dderwen	Clunderwen	31	0.00	0.00	0.00	27.09	30.96	30.96	30.96	0.00	0.00	119.96
HSG/029/00014	Opposite Woodholm Close	Crundale	15	0.00	0.00	19.20	19.20	19.20	0.00	0.00	0.00	0.00	57.61
HSG/029/LDP2/1	West of Ashford Park	Crundale	22	0.00	0.00	21.09	28.12	28.12	0.00	0.00	0.00	0.00	77.33
HSG/043/LDP2/1	Adjacent to Brackenhurst	Hill Mountain	15	0.00	0.00	10.44	10.44	10.44	10.44	10.44	0.00	0.00	52.22
HSG/046/LDP2/1	Land at West End Cottages	Hundleton	14	0.00	0.00	0.00	0.00	13.57	16.97	16.97	0.00	0.00	47.51
HSG/047/LDP2/1	South of The Crown	Jeffreyton	10	0.00	0.00	48.40	48.40	0.00	0.00	0.00	0.00	0.00	96.79
HSG/049/LDP2/1	East of Brookfield Close	Keeston	27	0.00	0.00	10.92	21.85	21.85	21.85	21.85	0.00	0.00	98.32
HSG/060/LDP2/1	Adjacent to Maesybryn	Llandissilio	26	0.00	0.00	0.00	0.00	0.00	15.76	22.07	22.07	22.07	81.97
HSG/066/LDP2/1	East of Hazelbank	Llanstadwell	10	0.00	0.00	0.00	0.00	0.00	17.66	17.66	0.00	0.00	35.32
HSG/081/LDP2/1	West of Globe Inn	Maenclochog	15	0.00	24.48	24.48	24.48	0.00	0.00	0.00	0.00	0.00	73.44
HSG/113/LDP2/1	South of Robeston Court	Robeston Wathe	5	0.00	0.00	0.00	17.94	26.92	0.00	0.00	0.00	0.00	44.86
HSG/119/LDP2/1	Land between Cornerways and Austalise	Simpson Cross	18	0.00	0.00	13.41	13.41	13.41	13.41	6.71	0.00	0.00	60.35
HSG/120/00018	NW of Wesley Way	Spittal	10	0.00	7.56	7.56	7.56	7.56	0.00	0.00	0.00	0.00	37.81
HSG/135/LDP2/1	North of Bulford Road Bypass	Tiers Cross	6	0.00	0.00	0.00	0.00	0.51	0.51	0.00	0.00	0.00	1.02
HSG/149/LDP2/1	Land at Ford Farm	Wolfscastle	14	0.00	0.00	0.00	0.00	14.19	14.19	14.19	7.09	0.00	49.66
HSG/086/LDP/7	Land NE Beaconsing, Steynton	Milford Haven	14	0.00	0.00	0.64	0.64	0.51	0.00	0.00	0.00	0.00	1.79
			<b>Addition al load per year</b>	<b>38.00</b>	<b>289.31</b>	<b>857.25</b>	<b>1239.32</b>	<b>1087.57</b>	<b>794.15</b>	<b>643.49</b>	<b>601.58</b>	<b>332.28</b>	<b>5882.95</b>
			<b>Cumulati ve load per year</b>	<b>38.00</b>	<b>327.32</b>	<b>1184.57</b>	<b>2423.89</b>	<b>3511.46</b>	<b>4305.61</b>	<b>4949.09</b>	<b>5550.67</b>	<b>5882.95</b>	

5.89 **PS** Nutrient neutrality is not simply a consideration at the planning permission stage but can also affect the discharge of conditions and reserved matters where new evidence comes to light. It reinforces the precautionary principle at the heart of environmental law: if there is any reasonable doubt about a development's potential impact on a protected site, a full appropriate assessment must be undertaken before that development proceeds further. 'C G Fry & Son Ltd v Secretary of State for Levelling Up, Housing and Communities', has affirmed that any discharge of planning conditions, even under a previously granted permission, would require a fresh nutrient neutrality assessment. A review of sites listed under Policy GN 17 Residential commitments has been undertaken to identify a potential nitrogen load that may require mitigation.

**PS Table 44 Housing Commitments (Policy GN 17) Sum of Nitrogen Budget**

	Commitment Name	LDP Reference	Commitment Units Remaining in plan period	Development proposal (number of additional units):	Nitrogen budget + 20% buffer: kg TN/year will be generated
1.	Calvary Church	040/00373	8	8	<b>26.93</b>
2.	Snooker Club	040/00430	8	8	<b>25.87</b>
3.	Land N of Cleddau Bridge Hotel	096/00274	2	3	<b>14.33</b>
4.	Land N of Cleddau Bridge Hotel	096/00375	7	7	<b>42.42</b>
5.	Green Haven, Monkton	095/00180	11	11	<b>47.54</b>
6.	Springfield	095/00240	2	1	<b>6.48</b>
7.	Rushacre Gardens	088/00077	1	1	<b>48.95</b>
8.	Dingle Farm	088/00074	16	16	<b>50.44</b>
9.	North of New Road	003/00040	35	35	<b>121.34</b>
10.	South of Tinker's Fold	025/00028	<u>2</u>	5	<u>19.03</u>
11.	Dingle Lane	029/00013	1	1	<b>4.46</b>
12.	Woodholm Farm	029/00026	<u>32</u>	3	<b>15.2</b>
13.	Leven Close	044/00050	1	1	<b>5.36</b>
14.	Cyfin Barn Farm	044/00063	3	4	<b>13.68</b>
15.	Harcourt Close	044/00015	<u>9</u>	5	<u>19.3</u>
16.	Maes Roslyn	081//LDP/01	13	4	<b>20.75</b>
17.	Sageston Fields	015/00022	<u>3</u>	7	<u>23.57</u>
18.	Hawn Lake	011/00011	1	1	<b>3.82</b>
19.	Land to the S of Kiln Park	012/00004	<u>2</u>	2	<u>28.2</u>
20.	Barnlake Point	154/00001	1	10	<b>56.3</b>
		<b>Totals</b>		<b>133</b>	<b>593.97</b>

**New Table 45 Phasing Budget - Housing Commitments (Policy GN 17) Phasing Nitrogen Budget**

Development Monitoring Reference	Site Name	Settlement	Development proposal (number of additional units):	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Nitrogen budget + 20% buffer: kg TN/year
040/00373	Calvary Church	Haverfordwest	8	0.0	13.5	13.5	0.0	0.0	0.0	0.0	0.0	0.0	26.93
040/00430	Snooker Club	Haverfordwest	8	0.0	12.9	12.9	0.0	0.0	0.0	0.0	0.0	0.0	25.87
096/00274	Land N of Cleddau Bridge Hotel	Pembroke Dock	3	4.8	4.8	4.8	0.0	0.0	0.0	0.0	0.0	0.0	14.33
096/00375	Land N of Cleddau Bridge Hotel	Pembroke Dock	7	0.0	12.1	18.2	12.1	0.0	0.0	0.0	0.0	0.0	42.42
095/00180	Green Haven, Monkton	Pembroke	11	0.0	13.0	8.6	13.0	13.0	0.0	0.0	0.0	0.0	47.54
095/00240	Springfield	Pembroke		0.0	6.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.48
088/00077	Rushacre Gardens	Narberth	1	0.0	49.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	48.95
088/00074	Dingle Farm	Adjacent to Narberth	16	0.0	0.0	0.0	15.8	15.8	18.9	0.0	0.0	0.0	50.44
003/00040	North of New Road	Begelly	35	0.0	0.0	0.0	0.0	0.0	17.3	34.7	34.7	34.7	121.34
025/00028	South of Tinker's Fold	Cosheston	5	15.2	3.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	19.03
029/00013	Dingle Lane	Crundale	1	0.0	4.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.46
029/00026	Woodholm Farm	Crundale	3	0.0	0.0	0.0	0.0	5.1	10.1	0.0	0.0	0.0	15.2
044/00050	Leven Close	Hook	1	5.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.36
044/00063	Cyfin Barn Farm	Hook	4	6.8	6.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	13.68
044/00015	Harcourt Close	Hook	5	19.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	19.3
081/LDP/01	Maes Roslyn	Maenclochog	4	10.4	5.2	5.2	0.0	0.0	0.0	0.0	0.0	0.0	20.75
015/00022	Sageston Fields	Sageston	7	13.5	10.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	23.57
011/00011	Hawn Lake	Burton	1	0.0	3.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.82

012/00004	Kiln Park	Burton Ferry	2	28.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	28.2
154/00001	Barnlake Point	Barnlake	10	0.0	0.0	28.2	28.2	0.0	0.0	0.0	0.0	0.0	0.0	56.3
			<b>Additional load per year</b>	<b>103.54</b>	<b>145.91</b>	<b>91.34</b>	<b>69.00</b>	<b>33.79</b>	<b>46.38</b>	<b>34.67</b>	<b>34.67</b>	<b>34.67</b>	<b>34.67</b>	593.97
			<b>Cumulative load per year</b>	<b>103.54</b>	<b>249.45</b>	<b>340.79</b>	<b>409.79</b>	<b>443.58</b>	<b>489.96</b>	<b>524.63</b>	<b>559.30</b>	<b>593.97</b>		

5.90 **PS** No deduction has been made for 30% SuDS in the above table as it is uncertain as to whether this is achievable on these 'older' planning permissions.

**PS Table 46 Windfall - Nitrogen Budget**

	Number of housing units	Potentially affected by Nitrogen Issues	% Affected
Large Windfall (Urban)	226	182	81 %
Large Windfall (Non-Urban)*	95	61	64%
Small Windfall in settlements *	488	321	66 %
Small Windfall in countryside**	61	35	57 %
		599	dwellings
	23 dph	26.04	Ha

5.91 **PS** The nutrient budget calculator using the windfall dwellings affected total (599 dwellings) with an average estimate of 23 dwellings per hectare figures to calculate a land area (26 Ha) results in an estimated 2,273.54 kg TN/year without SUDS or 2072.60 kg TN/year with 30% SuDS.

**PS Delivery of Allocations 'other than' Housing**

5.92 **PS PS** Table 47 All other Allocations below lists all the other allocations from the Plan which are likely to generate wastewater (solar array allocations are screened in as a precautionary principle) and therefore are likely to have a significant effect. This shows how dominant the issue is for Plan delivery (66%).

5.93 **PS** Given that the implications of wastewater treatment for many of these sites is uncertain these sites will need to be considered on a case-by-case basis in terms of likely implications. Some have private treatment and extensive areas for mitigation to be considered on site. Gypsy Traveller sites can be estimated more accurately – see **PS** Table 48 below.

**PS Table 47 All other Allocations Summary Table Screened in 'Yes' or 'No'**

Screened In Yes or No Allocations Other than Housing					
Count of Allocation/Type	No	Yes	Grand Total	% No	% Yes
Community Facility	1		1	100%	0%
Employment	3	6	9	33%	67%

Gypsy Site	1	3	4	25%	75%
Mixed Use	1	1	2	50%	50%
Safeguarded Strategic Employment	5	11	16	31%	69%
Solar Array		2	2	0%	100%
Strategic Employment	3	5	8	38%	63%
Supported Accommodation	2	2	4	50%	50%
Waste Management		1	1	0%	100%
<b>Grand Total</b>	<b>16</b>	<b>31</b>	<b>47</b>	<b>34%</b>	<b>66%</b>

**PS** Table 48 Gypsy Traveller Allocations (Policy GN 24) Sum of Nitrogen Budget

Site Name	Drain into Milford Haven inner	Settlement	Total Units to be delivered in Plan period	Nitrogen budget + 20% buffer: kg TN/year will be generated
West of Kingsmoor Common Gypsy and Traveller site	Yes	Begelly	11	<b>47.51</b>
East of Withybush Gypsy and Traveller site	Yes	n/a	5	<b>56.12</b>
South of Monkton Playing Fields	Yes	Pembroke	15	<b>56.17</b>
<b>Grand Total</b>			<b>31</b>	<b>159.8</b>

5.94 Applying a 30% reduction of nitrogen load removal through SuDS gives a final estimated figure of 129.5 kg of nitrogen for Gypsy Traveller Allocation sites.

5.95 **PS** NRW has advised that a conclusion of no adverse effect on site integrity may be drawn in a Habitats Regulations Assessment, where any plans or projects in these areas with the potential to increase nutrient discharges can secure appropriate mitigation and demonstrate nutrient neutrality for nitrogen.

5.96 **PS** The screening assessment undertaken identifies those sites – set out above - that are likely to have a significant effect on the Pembrokeshire Marine SAC unless appropriate mitigation can be secured.

5.97 **PS** The total estimated nitrogen load from housing uses is set out in the table below.

**New Table 49 Sum Nitrogen Budget – Housing & Gypsy & Traveller**

	Total in KGs	Total in KGs with SUDS
Housing Windfall	2,273.54	2072.60
Housing Commitments	593.97	593.97
Housing Allocations	5882.95	5133.04
G+T Sites	159.8	129.5
Total	8910.26	7929.11

**New - Existing Safeguards and Mitigation in Policy regarding nitrogen**

5.98 **New** Policies detailed within the Deposit 2 Local Development Plan 2 will provide, to some degree, safeguards and a level of mitigation – see ‘New Table 34 Existing Safeguards and Mitigation in Policy ’

**PS Recommended Additional Mitigation for Nitrogen Issues**

- 5.99 **PS** Having carried out a screening assessment of the Local Development Plan, it is the Council’s view that without mitigating measures within the Plan text the Plan may lead to likely significant effects, in relation to the Pembrokeshire Marine SAC (area scoped in for assessing is the catchment area for the Milford Haven Inner part of the SAC shown in **PS** Figure 5 Extent of area affected by Nitrogen advice from NRW .
- 5.100 **New** Policy wording edits are set out in Appendix D to this Habitats Regulations Assessment.
- 5.101 **PS** To be an appropriate restriction enabling the plan-making body to ascertain no adverse effect on the integrity of a European site the restriction is made case specific, explicit and added to the policy wording.
- 5.102 **PS** The reasons for the edits are set out below.
- 5.103 **PS Policy GN 47 Water Quality and Protection of Water Resources** is a key policy in the Plan. It sets out the Plan’s requirements in relation to the protection of water quality and water resources. The policy sets out a framework for incorporating SuDS into development proposals; safeguarding watercourses with the use of ecological buffer zones and providing flood plain capacity. The policy is framed to then focus on demonstrating no adverse effect on phosphorous sensitive riverine Special Areas of Conservation. The policy as drafted does not cover nutrient neutrality requirements for nitrogen.
- 5.104 **PS** Given that the issue of nutrient neutrality continues to emerge for different geographies and different nutrient types in the Plan area the recommended mitigation is to ensure **that the Local Development Plan includes sufficient safeguards so that there is no net increase in catchments where nutrient**

**neutrality is mandated by Natural Resources Wales.**

- 5.105 **PS** All relevant developments within the catchment, will need to demonstrate that they are nutrient neutral (for the time frame that is mandated), either by their own means or through contributions to an agreed nutrient mitigation scheme, for the lifetime of the development.
- 5.106 **PS** Natural Resources Wales advice is that this requirement applies to residential development, tourist attractions and other development involving an overnight stay. There may also be cases where planning applications for certain new commercial or industrial developments, and for conference facilities, large retail sites or major tourist attractions could result in the release of additional nutrients into the river system. In such cases, further assessment is likely to be required to determine if the proposal will have an adverse effect on the integrity of the river or Marine SAC as the nature of the impact of the proposal can only be understood when the details of the proposal become available.
- 5.107 **PS** This advice, together with other information, **including the All Wales Nutrient Budget Calculator** which should be used to prepare a nitrogen budget to accompany applications, is available on the Council's Nutrient Neutrality webpage<sup>49</sup>.
- 5.108 **PS** It is proposed to include the following paragraph at the end of Policy GN 47 Water Quality and Protection of Water Resources to form part of the main policy wording (the full text proposed text of Policy GN 47 can be found in Appendix D which also includes proposed edits to deal with phosphates)

***'Where nutrient neutrality is required development involving an overnight stay (including dwellings and all forms of holiday accommodation) that discharges into a nutrient neutrality designated SAC catchment (either surface water, non mains drainage development or through wastewater treatment works) will be required to demonstrate that it will be nutrient neutral for the lifetime of the development, either by its own means or by means of agreed mitigation measures. In addition, proposals that serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the affected SAC catchment will also be required to demonstrate nutrient neutrality.'***

***Developer provision of sustainable drainage systems in the affected catchment using the recommended options to maximise removal rates will be required.***

***Policy GN 3 Infrastructure and New Development provides for the timely delivery of infrastructure (see criterion 2 bullet point 11). This would***

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<sup>49</sup> <https://www.pembrokeshire.gov.uk/planning-and-ecology/phosphates-guidance-from-national-resources-wales>

**include water treatment infrastructure to ensure no adverse effects result.'**

- 5.109 **PS** Reasoned Justification: Add to the end of the reasoned justification of Policy GN 47 (also included in Appendix D):

*'To ensure there is no net increase in nutrients, all relevant developments with drainage pathways into the nutrient neutrality waterbodies identified by Natural Resources Wales will need to demonstrate that they are nutrient neutral, either by their own means or through contributions to an agreed nutrient mitigation scheme, for the lifetime of the development. This requirement applies to residential development, tourist attractions, other development involving an overnight stay and development expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the affected SAC catchment. The relevant catchments are identified from time to time in advice published by Natural Resources Wales. This advice, together with other information, including the All Wales Nutrient Budget calculator should be used to prepare a nitrogen budget to accompany applications, and is available on the Council's Nutrient Neutrality webpage<sup>50</sup>. Any guidance Natural Resources Wales produce will be considered a material consideration at that stage, together with Policy GN 47 on Water Quality and Protection of Water Resources. Drainage requirements will need to be considered at the design stage and be developed and implemented in accordance with recognised standards'.*

- 5.110 **PS** A detailed edit of this policy is recommended to ensure that adequate protection is given to water quality issues arising from ongoing monitoring work being carried out in Special Areas of Conservation in the Plan area. Proposals will require careful consideration and compliance with this key Policy.

- 5.111 **New** It is also proposed to include requirements for enhanced SuDS treatment on site in the reasoned justification. 'For nitrogen, the publication 'Construction Industry Research and Information Association [CIRIA] (2023) refers to using SuDS to reduce nitrogen in surface water runoff' and advises in Chapter 8 that 'Where the SuDS management trains described in Option 1 and 2 (Sections 7.1 and 7.2) are designed in accordance with CIRA C753 and where full treatment is provided for all sub annual rainfall events, these schemes can be considered to capture and remove 30% of the nitrogen in the run off from the development as an average over the year.'[1]

[1]The performance of SuDS is extremely variable and dependent on the detailed design and the physical characteristics of the site. The figure of 30% is being used as a high-level assumption input for the calculator based on the

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<sup>50</sup> Guide being prepared for the Council—consultancy being commissioned 24<sup>th</sup> September 2025 Draft Developer Mitigation Handbook circulated for comment to constituent authorities (January 2026).

findings of the CIRIA report.

- 5.112 **PS** The mitigation required to strategic policies and other general policies of the Plan would necessitate a cross reference to this policy, as proposed for amendment (see policies listed below in **(New)**Table 50 Summary of edits needed to the Local Development Plan policies for Nitrogen . Given the significance of the implications of this Policy requirement it is proposed to elevate this policy to be a strategic policy of the Plan to be identified as 'Policy SP12a Water Quality and Protection of Water Resources.'
- 5.113 **PS Key Policies:** There are however key policies where the Plan needs to explicitly flag the requirement to address nutrient issues at an early stage, and by doing so:
- a. enabling the mitigation required to be planned and delivered in a way that avoids the development having to be refused permission at project stage because of its effects on the European site.
  - b. and, particularly with strategic policies, there is a need to ensure that any tensions between the strategic policy expectation for the delivery of targets and the more detailed policies of the Plan which enable delivery and will be addressing nutrient issues on a case-by-case basis are resolved by flagging in the strategic policies that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported. The strategic drive to deliver targets cannot override this requirement.
- 5.114 **PS** With these edits the LDP will have no adverse effect on the integrity of the Milford Haven Inner sub-catchment of the Pembrokeshire Marine SAC

**(New)Table 50 Summary of edits needed to the Local Development Plan policies for Nitrogen**

<b>Policies where mitigation is provided by edits to Policy 12A (formerly Policy GN 47)</b>
SP 03 – Affordable Housing Target
SP 11 – Countryside
SP 12 – Maintaining and Enhancing the Environment
SP 16 - Retail Hierarchy
SP 17 - Visitor Economy
SP 20 – Transport Infrastructure and Accessibility
GN 02 – Sustainable Design
GN 04 – Resource Efficiency and Renewable and Low-carbon Energy Proposals
GN 05 – Renewable Energy -target and allocations
GN 08 – Employment Proposals
GN 10 – Mixed-Use Proposals

GN 11 – Protection of Employment Sites and Buildings  
 GN 12 – Extensions to Employment Sites  
 GN 13 – Residential Development  
 GN 14 – Replacement Dwellings in the Countryside  
 GN 21 – Exception Sites for Local Needs Affordable Housing  
 GN 22 – Specialist and Supported Accommodation  
 GN 28- Protection and Enhancement of the Historic Environment  
 GN 29 – Community Facilities  
 GN 31 – Retail and Commercial Centre Development  
 GN 32 – Out-of-Centre Retail and Commercial Development  
 GN 33 – Farm Diversification  
 GN 34 – Conversion or Change of Use of Agricultural Buildings  
 GN 35 – Marinas  
 GN 36 – Transport Routes and Improvements – Part 1  
 GN 37 – Working of Minerals – Part 1  
 GN 38 – Safeguarding and Prior Extraction of the Mineral Resource  
 GN 39 – Secondary Aggregates and Recycled Waste Minerals  
 GN 53 – Community Growing Spaces  
 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 60 – Disposal of Waste on Land

**Mitigation Proposed:** A detailed edit of Policy GN 47 Water Quality and Protection of Water Resources is proposed to ensure that adequate protection is given to water quality issues arising from ongoing monitoring work being carried out in Special Areas of Conservation in the Plan area. Proposals will require careful consideration and compliance with this key Policy, i.e. Policy GN 47.

The mitigation required to other strategic and general policies of the Plan listed above would necessitate a cross reference to Policy GN 47, as proposed for amendment.

Given the significance of the implications of the Policy GN 47 requirement it is proposed to elevate Policy GN 47 to become a strategic policy of the Plan to be identified as Policy SP12a Water Quality and Protection of Water Resources.

The edits proposed to Policy GN 47 (to be renamed Policy 12a) regarding nitrogen will:

- highlight that where housing development either allocated sites or commitments or windfall sites are affected by nitrogen issues that the nutrient neutrality approach is being taken in order to grant permission the planning authority.
- Provides for mitigation measure that can be taken by the applicant and then for the need for the Council to be satisfied that the identified mitigation

	<p>will avoid adverse effects on the integrity of the SAC.</p> <ul style="list-style-type: none"> <li>▪ Include specific requirements regarding SuDS to achieve maximum removal of (nitrogen and phosphates) on site.</li> </ul> <p>Notwithstanding this there are key policies where the Plan needs to explicitly flag up the water quality issue at an early stage, so enabling mitigation to be planned and delivered in a way that avoids the development having to be refused permission at project stage because of its effects on the European site. These policies are commented upon below.</p>
<p><b>SP 2 Housing Requirement</b></p>	<p>The main policy wording is proposed for editing.</p> <p>The re-wording flags that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported. The approach will also address any tensions assumed between the strategic policy expectation for the delivery of the housing land supply and the more detailed policies of the Plan.</p>
<p><b>SP 4 Gypsy, Traveller and Show-people's Accommodation</b> <b>SP 5 Supporting Prosperity</b></p>	<p>The Policy re-wordings flags that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported. As strategic policies there is a need to ensure that any tensions between the strategic policy expectation for the delivery of gypsy traveller accommodation and employment land and the more detailed policies of the Plan which will be addressing nutrient issues on a case-by-case basis are resolved.</p>
<p><b>SP 08 - Regional Growth Areas</b> <b>SP9: Service Centres and Service Villages</b></p>	<p>Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are settlements where potentially nutrient issues may arise.</p> <p>Settlements are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing.</p>
<p><b>SP13: Port and energy-related Development and Celtic Freeport</b></p>	<p>Elevate paragraph 4.8 of the reasoned justification to the main policy wording and ensure the Policy rewording flags that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported.</p> <p>There is a need to ensure that any tensions between the strategic policy expectation for the delivery of employment land and the more detailed policies of the Plan which will be addressing nutrient issues on a case-by-case basis are</p>

	resolved.
<b>SP 14 Strategic Employment Provision</b> <b>SP 15 Safeguarding of existing Strategic Employment Sites</b> <b>GN 9 Employment Allocations</b>	<p>The Policy re-wording flags that applications that can't rule out an adverse effect on the integrity of sites of national nature conservation importance can expect that the proposal will not be supported.</p> <p>As a strategic policy there is a need to ensure that any tensions between the strategic policy expectation for the delivery of the employment land and the more detailed policies of the Plan which will be addressing nutrient issues on a case-by-case basis are resolved.</p> <p>The policy can also identify sites listed where there are phosphorous (and nitrogen) issues that need to be addressed so expectations are clear.</p>
<b>GN 2 Sustainable Design</b>	Include reference to water quality issues with a cross reference to Policy GN 47 in paragraph 5.23 of the reasoned justification.
<b>GN 3 Infrastructure and New Development</b>	<p>Add the words '(including water quality)' after the word 'Water' in criterion 11. Add a paragraph to the end of the reasoned justification: <i>The need to ensure that proposals provide required mitigation to meet Policy GN 47 Water Quality and Protection of Water Resources will be considered to be an 'overwhelming need' within the terms of this policy.</i> (See</p> <p>The purpose of this policy is to ensure that where development requires planning obligations to be acceptable in planning terms then the obligations required will be prioritised. Given the fact that permissions will not be granted if it would result in an adverse effect on the integrity of sites of national nature conservation importance then it would also follow that in order to ensure the site can be released the provision of mitigation in relation to nutrients will have to be a priority.</p>
<b>GN 10 Mixed-Use Proposals</b> <b>GN 13 – Residential Development</b>	<p>Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.</p> <p>Additional text is included to flag up front for the applicant that there may be additional requirements for phosphates and/or (nitrogen) in some locations.</p>
<b>GN 16 Residential Allocations</b>  <b>GN 17 Residential Commitments</b>	<p>Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.</p> <p>Additional text is included to flag up front for the applicant that there are additional requirements for phosphates and/or (nitrogen).</p>

	<p>Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).</p> <p>Sites or phases of sites dependant on WwTW permit reviews are suffixed with '*'</p> <p>Sites requiring enhanced SuDS for phosphorous or nitrogen are suffixed 'PS' or 'NS' respectively</p> <p>Sites requiring off site mitigation for phosphorous or nitrogen are suffixed 'PM' or 'NM' respectively.</p>
<p><b>GN 23 Specialist and Supported Accommodation Allocations</b></p> <p><b>GN 24 Gypsy and Traveller Site Allocations</b></p> <p><b>GN 25 Gypsy and Traveller Sites and Pitches</b></p> <p><b>GN 30 Community Facilities Allocations</b></p> <p><b>GN 36 Transport Routes and Improvements</b></p> <p><b>GN 59 Waste Management Facilities</b></p>	<p>Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.</p> <p>Additional text is included to flag up front for the applicant that there are additional requirements for phosphates and/or (nitrogen).</p> <p>Of particular concern are sites where identified where there are potentially nutrient issues arising. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).</p>
<p><b>GN 38 – Safeguarding and Prior Extraction of the Mineral Resource</b></p>	<p>Criterion 2) has a typographical error contained in it which will require a Matters Arising Change. 'Extraction would <u>not</u> have an unacceptable impact on environmental or amenity considerations; or' *(see also Policy GN 47 commentary above)</p>

<b>GN 41 Protection of National Statutory Environmental Designations</b>	Explicitly advise development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.
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## Air Quality

5.115 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.

5.116 Summary table of LSE decision, and AA where relevant.

**Table 51 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. – Allocations <a href="#">1718</a> Units in plan policies Commitment <a href="#">455</a> units (total figure) Credible risk of LSE – screen in. <b>AA taken forward.</b>
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. <a href="#">Allocations</a> 112 units Commitment <a href="#">61</a> units (total figure) 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. <b>No credible risk of LSE</b>
Bristol Channel SAC		X	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>

European site	Roads within 200m	Distance to nearest site boundary	Credible evidence of a real risk against methodology?
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. <a href="#">Allocations 2181</a> units, giving rise to additional traffic flows. <a href="#">Commitments 508 units (in total)</a> At A477 – road crosses site – small area. <b>LSE is predicted. Take forward to AA</b>
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 <a href="#">allocations</a> development in plan policies = only <a href="#">75</a> units close to site <a href="#">Commitments 76 units in total</a> Increase in traffic may results adjacent to site boundary. Site exceeded – but traffic is not the key source of pollution.

European site	Roads within 200m	Distance to nearest site boundary	Credible evidence of a real risk against methodology?
			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 = <b>no credible risk LSE is not predicted</b>
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 <a href="#">Allocations 354 units within 10km</a> <a href="#">Commitment 115 units (in total) within 10km</a> 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	Y		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. <a href="#">Allocations 52 units close to site, 27 units from one housing commitment</a> Unlikely to give rise to significant additional traffic flows.

European site	Roads within 200m	Distance to nearest site boundary	Credible evidence of a real risk against methodology?
			<p>Designated features are not sensitive to atmospheric pollution.</p> <p>Process contribution from roads – currently 4% from roads</p> <p>No credible risk of LSE</p>
Preseli SAC	Y	Adjacent in places	<p>Site within 200m of road</p> <p>Site is located adjacent to minor roads, (2008 Manual count of only 63 ‘all motor vehicles’ Daily Traffic)</p> <p><a href="#">Allocations 381</a> units within <a href="#">10</a> km</p> <p><a href="#">Commitments 105 (in total)</a></p> <p>Site conditions - traffic currently 4% of total Nitrogen deposition (KgN/ha/yr) from combined UK sources.</p> <p>47% from Livestock – road emissions is not the key source of pollution-</p> <p>Screened in</p> <p><b>No adverse effect on site integrity in view of the site conservation objectives</b> from increase vehicle emissions from plan policies – scale of increase traffic is very small.</p>
St David’s SAC			<p>Site is not located within 200m of any roads</p> <p>No credible risk if LSE</p>
Yerbeston Tops SAC			<p>Site is adjacent to minor roads,</p> <p><a href="#">557</a> units residential allocations within <a href="#">10</a> km</p> <p><a href="#">153 units commitments (in total)</a></p> <p>Contribution 4% from Road emissions</p> <p>Existing air quality is just below CL.</p> <p>No credible risk that increase vehicle emissions would cause 1% threshold exceedance</p>
Pembrokeshire Bat Sites and Bosherton Lakes SAC			<p>Roads within 200m</p> <p>Site is adjacent to minor roads,</p> <p>Features &amp; habitats not inherently sensitive air pollutants</p> <p>Additional housing <a href="#">allocations</a> is <a href="#">1979</a> units.</p>

European site	Roads within 200m	Distance to nearest site boundary	Credible evidence of a real risk against methodology?
			<a href="#">Commitments 453 units (in total)</a> 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

5.117 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

5.118 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 maritima*). 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 (20 – 30 kgN/ha/yr) for higher and lower saltmarsh.

5.119 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 allocations and commitments 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 478 and 935 respectively (Table 5.3 in JNCC (2021) Guidance on Decision-making Thresholds for Air Pollution JNCC guidance (JNCC Report 696)<sup>51</sup> (also shown in Table 10 of this document) shows that a 1% increase in critical load (where critical load equals 20 kgN/ha/yr) is equivalent to an additional 1434 AADT for short vegetation (So a 1% increase is equal to 0.2 kgN/ha/yr). 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 well below the critical load of (20 – 30 kgN/ha/yr).

5.120 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<sup>-3</sup>) 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/m<sup>3</sup> applies, however where other vegetation is concerned (which is the case for the relevant features listed above, a critical level of 3 ug/m<sup>3</sup> is applied. For the Pembrokeshire marine SAC the ammonia concentration ug/m<sup>3</sup> does not exceed 1.48

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<sup>51</sup> <https://data.jncc.gov.uk/data/6cce4f2e-e481-4ec2-b369-2b4026c88447/JNCC-Report-696-Main-FINAL-WEB.pdf>

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/m<sup>3</sup>, it is considered that there will be no significant additional contributions to ammonia levels from the proposed plan.

5.121 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.

5.122 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**

5.123 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.

5.124 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/m<sup>3</sup> 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/m<sup>3</sup> 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)

- 5.125 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>52</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)

- 5.126 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 as proposed for amendment will be relevant.

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<sup>52</sup> <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040-habitats-regulations-assessment.pdf>

## 7.6. Mitigation Measures – Implementation

### General Measures and Principles (formerly Appendix A to the HRA)

- 6.1. General Measures (project-level HRA.) which will be applied to all developments that may lead to Likely Significant Effects on Habitat Network Sites: 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.
- 6.2. 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.
- 6.3. 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.

### New Nutrient Mitigation Implementation

## **New** Granting of Permission

- 6.4. **PS** National legislation allows Local Planning Authorities to grant planning permission when they are satisfied that a proposal complies with national legislation and local development plan policies and to secure avoidance and mitigation through planning conditions and/or S106 legal agreements. Planning Policy Wales Edition 12<sup>53</sup> advises: *'Before authorising development or adopting a land use plan which is likely to have a significant effect on a SAC or SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an appropriate assessment of the implications for the designated features, consult NRW and have regard to NRW's representations. The development can normally only be authorised or the plan adopted, if the planning authority ascertains that it will not adversely affect the integrity of the site, if necessary taking into account any additional measures, planning conditions or obligations.'*
- 6.5. **PS** Conditions should only be used when they satisfy 6 tests<sup>54</sup>, which require them to be necessary; relevant to planning; relevant to the development to be permitted; enforceable; precise and reasonable in all other respects. Mitigation which may be required off site may involve land that is not within the control of the applicant, or requires the consent or authorisation of another person or body will usually fail the tests of reasonableness and enforceability. It is however possible to achieve a similar result using a condition worded in a negative form (Grampian condition). This could for example prohibit occupation until a specified action has taken place. Such conditions should not be used where there are no prospects at all of the action in question being performed within the time-limit imposed by the permission.
- 6.6. **PS** Collecting financial contributions towards mitigation solutions would usually need to be by S106 obligation which will be delivered either by the Council or in partnership with another agency.
- 6.7. **New** Mitigation measures will therefore be required as a way of addressing the results of the nutrient calculator for both phosphates and nitrogen before planning permission can be granted. With just the amended policy framework recommended in Appendix D the Council will still not be able to demonstrate deliverability of sites identified for development in the Local Development Plan.
- 6.8. **New** Below is a commentary on supports, guidance and toolkits available to applicants and local planning authorities to a point where planning permission can be granted and conditions discharged:
- A Nitrogen Mitigation Developers Handbook (local authority led)
  - The Nutrient Management Boards (local authority led)
  - The role of the All-Wales Calculator (WG)

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<sup>53</sup> <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf> Extract from paragraph 6.4.29

<sup>54</sup> <https://www.gov.wales/sites/default/files/publications/2019-05/the-use-of-planning-conditions-for-development-management-wgc-0162014.pdf>

- The Mitigation Measures Menu (NRW)
- Pembrokeshire County Council's land holdings study
- Multiple Benefit opportunities

### **Mitigation Developers Handbook Nitrogen **New****

6.9. **New** The Council is party to a commission by Carmarthenshire Council for the preparation of a developers' handbook on nitrogen mitigation for use by South West Wales authorities. A draft was circulated for comment on the 14th of January 2026.

6.10. **New** This Developer Mitigation Handbook could potentially serve as Supplementary Planning Guidance (SPG) to Local Development plan 2 and provides information and advice to support applicant's to adequately consider DIN neutrality in planning submissions within the Milford Haven Inner (Pembrokeshire Marine SAC) and Burry Inlet Inner (Carmarthen Bay and Estuaries SAC) water body catchments. It explains how to quantify nitrogen loads, identify proportionate mitigation that can be implemented and maintained, and present the necessary information to support robust and consistent planning authority decision making to ensure that their obligations under the relevant environmental legislation are appropriately discharged.

6.11. **New** The guidance is intended primarily for residential development and not for other forms of development such as employment, although it may be applicable in some situations. There are four objectives of the guidance:

- To provide a 'step by step' process for development management officers and developers of how to assess and development appropriate mitigation solutions for nutrient neutrality assessment.
- To provide an overview of on-site and off-site mitigation options building on the existing NRW Mitigation Menu<sup>55</sup>.
- Provide clarify as to whether mitigation measures qualify as Habitats Directive Article 6(3)8 interventions rather than Article 6(2) measures, consistent with NRW guidance on additionality and effectiveness at the time of assessment.
- To provide worked examples to show how to estimate DIN reductions from some of these measures alongside outputs from the Welsh Government nutrient neutrality calculator or bespoke calculations.

6.12. **New** Below is an extract from the draft Mitigation Handbook (Jan 2026) which provides a step-by-step guide of what the requirements will be for applicants.

### ****New** Table 52 = Table 4-2 Supporting detail for the process of achieving DIN neutrality from the Developer Mitigation Handbook (Draft)**

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<sup>55</sup> <https://www.gov.wales/nutrient-budget-calculator>

Step	Supporting Detail
<p><b>Step 1: Is the Development Site or the WwTW receiving foul water located within a DIN nutrient sensitive catchment?</b></p>	<p>Developers can check whether a proposed development or the WwTW into which foul drainage will be directed lies within a nutrient neutrality catchment by checking the following link: <a href="#">Marine SAC Freshwater Catchments Requiring Nitrogen Neutrality   DataMapWales</a>.</p> <p>If the development of the corresponding WwTW is within a nutrient sensitive catchment then a nutrient budget calculation <b>will be required</b>.</p> <p>If the development or corresponding WwTW <b>does not lie</b> within a nutrient sensitive catchment, then nutrient neutrality is not required (proceed with planning process without NN assessment).</p>
<p><b>Step 2: Estimate residual nutrient change of the proposed development.</b></p>	<p>Developers must demonstrate that their proposal will not lead to an increase in DIN to the European Protected Sites using appropriate evidence. The All Wales Calculator has been developed by Welsh Government as a tool to assist developers with this process (<a href="#">Nutrient budget calculator   GOV.WALES</a>). Input parameters to calculate the nutrient budget include:</p> <ul style="list-style-type: none"> <li>▪ Development details such as site location, SAC catchment, development type, number of dwellings and site area.</li> <li>▪ Drainage and wastewater assumptions: foul drainage route, wastewater treatment works serving the site, and any standard occupancy assumptions used by the calculator.</li> </ul> <p>Surface water information including: catchment details (rainfall, soil drainage type) existing land use(s), proposed land use(s).</p> <p>Where the outcome of the nutrient budget calculation is that there is no excess DIN then no further assessment or mitigation is required.</p> <p>Where the outcome is that the development will lead to an increase in DIN to the catchment of the European Protected Site further assessment and potentially the identification of suitable mitigation is required.</p>
<p><b>Step 3: Consider whether a threshold based (de minimis) approach can be applied.</b></p>	<p>The threshold-based (de minimis) approach refers to the concept of there being a minimum threshold below which the increase in DIN loading is so small that it can reasonably be treated as insignificant and therefore does not require detailed assessment or mitigation.</p> <p>In this regard, European Court of Justice (ECJ) in combined cases C-293/17 and C-294/17 (the Dutch Nitrogen case) concluded that if a European Protected Site is in a deteriorating condition (such as through excess nutrient levels) there are very limited circumstances under which further discharges of nutrients to a site can legally be permitted. In the absence of any empirically derived threshold by which additional aquatic inputs of nitrogen can be deemed nugatory or de minimis, any new development within a designated site catchment could increase nitrogen into the protected sites above consented levels and thus interfere with the ability of the site to achieve its conservation objectives.</p> <p>On this basis, any nitrogen budget above 0 kgN/yr currently requires consideration at Step 4. Nonetheless, the potential to apply the threshold-based approach should be kept under review in the event that minimum thresholds are defined for DIN.</p>
<p><b>Step 4: Are there developer-led mitigation options to achieve nutrient neutrality?</b></p>	<p>Further details on potential mitigation options are provided in Section 5 and in Appendix A (of the Mitigation Handbook).</p> <p>The adopted mitigation measures should be secured in perpetuity (typically for 80-125 years) and must demonstrate a quantifiable and reliable reduction in DIN to the affected SAC, supported by evidence and referring to best practice advice from NRW. The outcomes must be sufficiently certain (i.e. reasonable scientific certainty as outlined in Section 2.4.1).</p>

Step	Supporting Detail
	<p>In the unlikely event that there are no mitigation options the developer may choose to consider whether a <b>derogations approach</b> can be taken. However, this is expected only in exceptional circumstances.</p> <p>If the developer wishes to pursue a derogation due to being unable to achieve DIN neutrality, then the derogation provisions are set out in regulations 64 and 68 of the Habitats Regulations. Regulations 64 and 68 indicate that where it is not possible to conclude 'no adverse effects to site integrity' from a proposed development, and a competent authority is minded to apply the derogation provisions, they must:</p> <ul style="list-style-type: none"> <li>▪ Satisfy themselves that there are no alternative solutions to the plan or project subject to assessment;</li> <li>▪ Take a decision as to whether the plan or project must be carried out for imperative reasons of over-riding public interest (subject to certain criteria); and</li> <li>▪ Satisfy themselves that necessary compensatory measures which ensure that the 'overall coherence of the National Site Network is protected' can be secured by the appropriate authority (the Welsh Ministers for Wales).</li> </ul>
<p><b>Step 5: Are there on-site developer-led mitigation options to achieve nutrient neutrality?</b></p>	<p>Developers should consider the location of any mitigation relative to where the development will have its impact on the SAC to ensure that it avoids any increase in nutrients within the site. NRW are updating their guidance on this, but overall <b>measures should, where possible, be within the development site</b>. Where this is not achieved there must still not be detriment to the SAC:</p> <ul style="list-style-type: none"> <li>▪ For discharges directly into a marine SAC, the mitigation measure will need to be upstream of the location where the development site run-off and wastewater input will have a direct impact on the site.</li> <li>▪ If the discharge is indirect (i.e. upstream in the catchment of a marine SAC), then the mitigation measures can be upstream or downstream within the catchment, if it will provide the offsetting before the point at which the development impacts the marine SAC.</li> </ul>
<p><b>Step 6: Consult LPA to agree nutrient neutrality budget calculations, mitigation approach, and securing mitigation for the lifetime of the development.</b></p>	<p>Pre-planning application contact details for the relevant local authority can be found in Section 4.1 of this document.</p> <p>Developers must prepare and submit robust supporting documentation as part of the planning application to evidence what mitigation is required, how it will be provided, secured, and maintained for the lifetime of the development.</p> <p>Any mitigation must be secured through appropriate planning conditions and / or legal mechanisms (e.g. Section 106) and implemented in advance of the nutrient impacts occurring, with arrangements in place to ensure long-term compliance.</p> <p>Engagement with the local planning authority and, where necessary, NRW should take place throughout the process but is particularly recommended once a mitigation solution has been developed but prior to submission of the planning application.</p>
<p><b>Step 7: Submit planning application with supporting Nutrient Mitigation Assessment.</b></p>	<p>A Nutrient Mitigation Assessment should accompany the planning application, demonstrating a sufficiently certain mitigation approach, legally secured in perpetuity for the lifetime of the development.</p>

6.13. **New** The Council is likely to also need supplementary guidance in terms of Phosphates which is best co-ordinated via the Nutrient Management Boards.

## **New Nutrient Management Boards**

6.14. Regarding the three Nutrient Management Plans<sup>56</sup>, these Management Boards are putting in place practical measures to help improve the quality of river water in the three West Wales Riverine (non-tidal) SACs – those for the Teifi, Cleddau and Tywi. Part of the Teifi catchment is in Pembrokeshire and most of the Cleddau catchment is in Pembrokeshire.

6.15. A Nutrient Management Plan has been prepared for each of the three catchments and each has published. The work of Board has focused on phosphates to date. Chapter 5 of this HRA sets out the conclusions reached in relation to Affonydd Cleddau and Afon Teifi and the mitigation required. The Joint NMB is under review at present to provide focus going forward in implementation of the relevant Management Plans. Each local authority that forms part of the Board is committed to its future retention albeit with its purposes necessarily refocused around delivery of mitigation (January 2026).

## **New All Wales Calculator<sup>57</sup>**

6.16. **New** The All-Wales Nutrient Budget Calculator is a free tool for assessing the likely nutrient impact of development proposals. It helps applicants:

- Identify whether nutrient neutrality is required
- Calculate total nutrient load in kg/yr
- Plan appropriate mitigation based on site specifics

6.17. **New** By way of example (and using the toolkit above) the total estimated mitigation required for the affected allocations (housing allocations and commitments, windfall and Gypsy and Traveller sites - see Table 49 above) is 7,929.11kg TN/year and this would require the equivalent of 154 hectares of dairy (7,929.11/51.64) or 515 hectares of lowland grazing to be changed over to woodland to meet the requirements (7,929.11/15.39).

6.18. **New** Paragraph 5.39 above provides a table showing phosphate loads for housing and Gypsy and Traveller sites. In freely draining soils this would equate to 828 Ha dairy changing over to woodland and in impeded drainage 129 Ha dairy to woodland.

6.19. **New** Below are tables showing potential load reductions per hectare for both nitrogen and phosphates. The type of soil whether impeding or free flowing has a significant impact on the load that requires mitigation for phosphates.

## **PS Table 53 Estimated Nitrogen Load Reductions Per hectare using the All Wales Nutrient Calculator**

Pre-existing Landcover	PreNitrogen load (kg TN/year)	New landcovers	New Nitrogen load (kg TN/year)	Reduction (kg TN/year)
Dairy	54.64	Woodland	3	51.64

<sup>56</sup> [Nutrient Management Board Website https://www.wwnmb.wales/](https://www.wwnmb.wales/)

<sup>57</sup> <https://www.gov.wales/nutrient-budget-calculator>

Pre-existing Landcover	PreNitrogen load (kg TN/year)	New landcovers	New Nitrogen load (kg TN/year)	Reduction (kg TN/year)
Lowland grazing	18.39	Woodland	3	15.39
Less Favoured Area grazing	10.62	Woodland	3	7.62
Mixed	22.55	Woodland	3	19.55
General cropping	9.11	Woodland	3	6.11
Cereals	16.73	Woodland	3	13.73
Horticulture	12.44	Woodland	3	9.44
Poultry	55.27	Woodland	3	52.27
Outdoor pig farming	34.65	Woodland	3	31.65
Dairy	54.64	Lowland grazing	18.39	36.25
Dairy	54.64	General cropping	9.11	45.53
Dairy	54.64	Mixed	22.55	32.09

**New** Table 54 Estimated Phosphate Load Reductions Per hectare using the All Wales Nutrient Calculator (Freely draining)

Pre-existing Landcover	PrePhosphate load (kg TN/year)	New landcovers	New Phosphate load (kg TN/year)	Reduction (kg TN/year)
Dairy	0.36	Woodland	0.02	0.34
Lowland grazing	0.21	Woodland	0.02	0.19
Less Favoured Area grazing	0.16	Woodland	0.02	0.14
Mixed	0.24	Woodland	0.02	0.22
General cropping	0.16	Woodland	0.02	0.14
Cereals	0.21	Woodland	0.02	0.19
Horticulture	0.19	Woodland	0.02	0.17
Poultry	0.25	Woodland	0.02	0.23
Outdoor pig farming	0.41	Woodland	0.02	0.39
Dairy	0.36	Lowland grazing	0.21	0.15
Dairy	0.36	General cropping	0.16	0.2
Dairy	0.36	Mixed	0.24	0.12

**New** Table 55 Estimated Phosphate Load Reductions Per hectare using the All Wales Nutrient Calculator (Impeded drainage)

Pre-existing Landcover	PrePhosphate load (kg TN/year)	New landcovers	New Phosphate load (kg TN/year)	Reduction (kg TN/year)
Dairy	2.2	Woodland	0.02	2.18

Pre-existing Landcover	PrePhosphate load (kg TN/year)	New landcovers	New Phosphate load (kg TN/year)	Reduction (kg TN/year)
Lowland grazing	1.25	Woodland	0.02	1.23
Less Favoured Area grazing	0.92	Woodland	0.02	0.9
Mixed	1.43	Woodland	0.02	1.41
General cropping	0.86	Woodland	0.02	0.84
Cereals	1.08	Woodland	0.02	1.06
Horticulture	0.96	Woodland	0.02	0.94
Poultry	1.3	Woodland	0.02	1.28
Outdoor pig farming	0.41	Woodland	0.02	0.39
Dairy	2.2	Lowland grazing	1.25	0.95
Dairy	2.2	General cropping	0.86	1.34
Dairy	2.2	Mixed	1.43	0.77

**PS Mitigation Measures Menu<sup>58</sup>**

6.20. Natural Resources Wales has advised using the Mitigation Measures Menu. This menu is available for use for both phosphates and nitrogen mitigation.

6.21. The spreadsheet advises that: *“This is a list of potential mitigation measures which does not mean NRW will accept all of these measures to be used for Nutrient Neutrality. Therefore, mitigation measures for any scheme will be assessed on a case-by-case basis, considering site specific conditions, meeting the Nutrient Neutrality Principles, and ensuring the correct permissions and regulatory requirements will be in place.”*

- 6.1. Below in **Error! Not a valid bookmark self-reference.** is a summary of mitigation measures that Natural Resources Wales have advised upon for using in the Mitigation Measures Menu.
- 6.2. There may be opportunities in the same land ownership of the developer/applicant and within the same catchment that could possibly be used to provide such mitigation.

**PS Table 56 Natural Resources Wales Mitigation Measures**

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate	
					Total Nitrogen	
Free Water Surface Wetlands / Integrated Constructed Wetlands	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	Total Nitrogen	Up to 80%
Vertical Flow Wetlands	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	Total Nitrogen	20-40%

<sup>58</sup> <https://www.gov.wales/river-pollution-summit-action-plan>

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate		
French Vertical Flow Wetlands	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	<table border="1"> <tr> <td><b>Total Nitrogen</b></td> <td>20-60%</td> </tr> </table>	<b>Total Nitrogen</b>	20-60%
<b>Total Nitrogen</b>	20-60%						
Horizontal Flow Wetlands	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	<table border="1"> <tr> <td><b>Total Nitrogen</b></td> <td>30-50%</td> </tr> </table>	<b>Total Nitrogen</b>	30-50%
<b>Total Nitrogen</b>	30-50%						
Waste Stabilisation Ponds	ARUP	Yes	No NRW policy	May need an Environmental Permit	<p><u>Facultative Ponds:</u> BOD5 - 40-56%; COD - 30-40%; Suspended Solids - 20-40%; <b>Total Nitrogen</b> - &lt;40%; <b>Total phosphorus</b> - &lt;25%; <b>Ammonia</b> - &lt;50%; Coliforms - 90-99%</p> <p><u>Anaerobic - Facultative Ponds:</u> BOD5 - 75-85%; COD - 65-80%; Suspended Solids - 70-80%; <b>Total Nitrogen</b> - &lt;60%; <b>Total phosphorus</b> - &lt;35%; <b>Ammonia</b> - &lt;50%; Coliforms - 90-99%</p> <p><u>Facultative Aerated Ponds:</u> BOD5 -75-85%; COD - 65-80%; Suspended Solids - 70-80%; <b>Total Nitrogen</b> - &lt;30%; <b>Total phosphorus</b> - &lt;35%; <b>Ammonia</b> - &lt;30%; Coliforms - 90-99%</p> <p><u>Complete Mix Aerated - Sedimentation Ponds:</u> BOD5 -75-85%; COD - 65-87%; Suspended Solids - 80-87%; <b>Total Nitrogen</b> - &lt;30%; <b>Total phosphorus</b> - &lt;35%; <b>Ammonia</b> - &lt;30%; Coliforms - 90-99%</p> <p><u>Anaerobic Facultative Maturation:</u> BOD5 -80-85%; COD - 70-83%; Suspended Solids - 73-83%; <b>Total Nitrogen</b> - 50-65%; <b>Total phosphorus</b> - &gt;50%; <b>Ammonia</b> - &gt;50%; Coliforms - &gt;99.99%</p>		
Algae Treatment	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	<p>Efficiency of nutrient removal rate dependant on wastewater source as follows:</p> <p><u>Municipal sewage water:</u> <b>total phosphorus</b> - 51-89%; <b>total nitrogen</b> - 82-94%</p> <p><u>Produced water:</u> <b>total phosphorus</b> - 73%; <b>total</b></p>		

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate		
					<p><b>nitrogen</b> - 92%</p> <p><u>Agro-industrial wastewater</u>: <b>total phosphorus</b> - 13-70%; <b>total nitrogen</b> - 34-49%</p> <p><u>Pharmaceutical wastewater</u>: <b>total phosphorus</b> - 82-92%; <b>total nitrogen</b> - 70-74%</p> <p><u>Landfill leachate</u>: <b>total phosphorus</b> - 93-100%; <b>total nitrogen</b> - 30-90%</p> <p><u>Aquaculture wastewater</u>: <b>total phosphorus</b> - 83-99%; <b>total nitrogen</b> - 49-86%</p> <p><u>Aqueous phase wastewater from biomass to energy generation process</u>: <b>total phosphorus</b> - 95-98%; <b>total nitrogen</b> - 60-99%</p> <p><u>Wastewater from mines</u>: <b>total phosphorus</b> - 83%; <b>total nitrogen</b> - 97%</p> <p>Metal removal rates: Cadmium: 33-73%; Chromium: 51-93%; Copper: 72-96%; Lead: 66-89%; Mercury: 35-97%; Nickel: 33-97%; Zinc: 40-98%</p>		
Reed Beds	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	<table border="1"> <tr> <td><b>Total Nitrogen</b></td> <td><b>91%</b></td> </tr> </table>	<b>Total Nitrogen</b>	<b>91%</b>
<b>Total Nitrogen</b>	<b>91%</b>						
Willow Systems	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	<table border="1"> <tr> <td><b>Total Nitrogen</b></td> <td><b>85-100%</b></td> </tr> </table>	<b>Total Nitrogen</b>	<b>85-100%</b>
<b>Total Nitrogen</b>	<b>85-100%</b>						
Ferric dosing	ARUP	No	No NRW policy	Permitting requirements will be scheme specific	Phosphorous only listed		
Private Treatment Systems	ARUP	Further evidence needed	No NRW policy	Permitting requirements will be scheme specific dependent on the types of activity	Phosphorous only listed		

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate
Improvements in WWTW	Natural England	No	N/A	N/A	
Package Treatment Plants connecting to mains	Natural England	No	N/A	N/A	
Land Use/Practice-Changes	ARUP	Yes	No NRW policy	EPR Permit not required	<p><u>Agroforestry</u>: <b>total phosphorus</b> - 5-72%</p> <p><u>Cover crops</u>: <b>total phosphorus</b> - 0-0.13 kg ha-1 year-1, or 108 kg P year-1</p> <p><u>Land-use change</u>: <b>total phosphorus</b> - 0.18-0.5 kg ha-1 year-1 (cropland to wetland); <b>total nitrogen</b> - 12.8-93% removal (cropland to wetland)</p> <p><u>Cessation of fertiliser / organic material application</u>: <b>total phosphorus</b> - 0.03-0.5 kg ha-1 year-1</p>
Field boundary management	ARUP	Yes	No NRW policy	Permitting requirements will be scheme specific	<p><u>Riparian buffer</u>: <b>total phosphorus</b> - 31-99% removal (depending on width), <b>total nitrogen</b> - 10-99% (depending on width)</p> <p><u>Field margin or forestry buffers</u>: <b>total phosphorus</b> - 11-95%; <b>nitrogen</b> (as nitrate) -25-100%; sediment - 29-100%</p> <p><i>Removal rates will be dependent on many variables including location, soil and crop type etc.</i></p>
Urban Sustainable Drainage Systems	ARUP	Yes	No NRW policy	Permitting requirements will be scheme specific	<p><u>Swale</u>: <b>total phosphorus</b> - 20-55%; <b>total nitrogen</b> - 50%; total suspended solids - 50-80%; heavy metals (lead, zinc, copper) - 31-83%</p> <p><u>Detention basins</u>: <b>total phosphorus</b> - 60-99%; <b>total nitrogen</b> - 85-90%</p> <p><u>Pervious surfaces (results for the surface soil layer)</u>: <b>total phosphorus</b> - &gt;75%; <b>total nitrogen</b> (organic) - 70-80%; Heavy metals (lead, zinc, chromium) - 45-97%</p> <p><u>Filter strips</u>: <b>total phosphorus</b> - 38%; <b>nitrogen</b> (as nitrate) - 10%; total suspended solids - 71%; heavy metals (zinc, lead) - 25-51%</p> <p><u>Bioretention systems</u>: <b>total phosphorus</b> - 80-90%; total suspended solids - 80-90%</p>

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate
Rural Sustainable Drainage Systems	ARUP	Yes	No NRW policy	Permitting requirements will be scheme specific	Spreadsheet not populated
River Restoration	ARUP	Further evidence needed	No NRW policy	FRAP or Ordinary Watercourse Consent	Spreadsheet not populated
Drainage Ditch Blocking	<a href="#">Ricardo</a>	Dependent on nutrient	No NRW policy	Ordinary Watercourse Consent	Spreadsheet not populated
Engineered Logjams	<a href="#">Ricardo</a>	Dependent on nutrient	No NRW policy	Ordinary Watercourse Consent	
Terrestrial Sediment Traps	<a href="#">Ricardo</a>	Yes	No NRW policy	Ordinary Watercourse Consent	

**New Council Land Mitigation/Restoration Opportunity**

- 6.22. **New** PCC owns approximately 1150Ha of land within the phosphate affected catchments and 1845Ha of land within the Nitrogen affected catchment. The Council is committed to utilizing its land assets to aid in the restoration of the Freshwater and Marine SAC's . This includes the county farm mitigation work outlined below (which may also identify restoration opportunities) as well as other biodiversity improvement projects run by the authority's Conservation Team which will continue to seek opportunities reduce nutrient inputs.
- 6.23. **New** The Council is commissioning work on a series of mitigation packages to assist applicants. A report seeking the buy-in of Cabinet to these proposals was considered and approved on the 6<sup>th</sup> of October 2025.<sup>59</sup>
- 6.24. **New** The Council is actively seeking to find opportunities to address developer mitigation requirements for phosphates, nitrogen and ammonia on its landholdings. The Council initially sought to engage consultants to bid on the whole County Council Estate but this has not been successful (early January 2026) so a shortlist of sites is now being taken forward inviting bids on farm sites in the north, mid and south of the County draining into either or both the phosphate and nitrogen affected catchment areas. The commission will also identify where actions can contribute to restoration rather than mitigation.
- 6.25. **New** The Bid was uploaded on Sell to Wales the week beginning 26<sup>th</sup> January 2026. The award date for the bids is the 20<sup>th</sup> of February 2026. The intention is to provide a series of bid opportunities going forward.
- 6.26. **New** The Council; once this phase of work is completed; will progress the creation of a local cost recovery scheme. The intention is to model the approach on how a nutrient credit scheme is being administered by Eastleigh Borough Council. The Eastleigh Borough scheme<sup>60</sup> is ran in-house.

**New Table 57 Eastleigh Borough Step by Step Guide for developers - Extract from Eastleigh Digital Brochure<sup>61</sup>**

EoI Received (template form provided to applicant) <sup>6263</sup> Once an interest form has been received, we (Council but not planning dept) will confirm whether credits are available to meet anticipated need, and work with you through the process outlined below:
1 Developer and Local Planning Authority go through planning process as usual.
2 Local Planning Authority confirms offset requirement and suitability of the scheme to us (Council but not planning department).
3 Council confirm credits are still available.

<sup>59</sup> <https://mgenglish.pembrokeshire.gov.uk/documents/s81147/1.5%20-%20Cabinet%20Report%20Nutrient%20Neutrality%20Update%201.pdf?LLL=0>

<sup>60</sup> <https://www.eastleigh.gov.uk/business/developers-how-to-unlock-your-development>

<sup>61</sup> [https://www.eastleigh.gov.uk/media/14521/eastleigh-borough-council\\_digital-brochure.pdf](https://www.eastleigh.gov.uk/media/14521/eastleigh-borough-council_digital-brochure.pdf) digital brochure step by step.

<sup>62</sup> <https://www.eastleigh.gov.uk/media/11649/nitrate-scheme-enquiry-form-11072022.pdf> nitrate

<sup>63</sup> <https://www.eastleigh.gov.uk/media/11913/phosphate-scheme-enquiry-form-20092022.pdf> phosphate

4 Local Planning Authority grants planning permission, probably with a pre-start or Grampian condition relating to nutrient mitigation. <sup>64</sup>
5 Developer buys credits from us.
6 We (Council but not planning department) issue a vesting certificate to developer. <sup>65</sup>
7 Developer applies to Local Planning Authority for discharge of condition.

6.27. **New** Eastleigh Borough Council monitors the sale of credits on a Nitrate/Phosphate Tracker Spreadsheet. Details captured include:

**New Table 58 Nitrate Tracker Spreadsheet – Eastleigh Borough Council**

S106 Y/N	WWTW River Catchment
Applicant Contact Phone Number Email Address	Invoiced etc.
Site Name	Credit Note No
Planning Reference	Nitrate Amount
EoI Received (template form provided to applicant)	
EOI Reference	
Offset land Reserved Credits (this will be derived from the first phase of the Council's study above or as part of a developer proposed mitigation proposal).	

<sup>64</sup> Eastleigh Borough Council • Conditions used to secure nitrate / nutrient mitigation - condition imposed after the applicant has advised of their nutrient impact and preferred method of mitigation;

*The development hereby permitted shall not be occupied until a mitigation package addressing the additional nutrient inputs arising from the development has been submitted to, and approved in writing by, the Local Planning Authority. Such a mitigation package shall address all of the additional nutrient loading upon protected European sites from the development and shall allow the Local Planning Authority to ascertain on the basis of the best available scientific evidence that such additional nutrient loading will not have an adverse effect on the integrity of those European Sites, having regard to the conservation objectives for they are designated. The mitigation package shall be implemented in full and evidence of this provided to the Local Planning Authority in writing prior to first occupation of the development. Reason: To mitigate the nitrates impacts arising from the development upon the European protected Solent Complex in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017.*

<sup>65</sup> The Vesting Certificate advise 'In consideration of the payment of £\*\*\*\*\* VAT, receipt of which we acknowledge, we write to confirm the acquisition of the Nitrate Credits as set out below.

Nitrate Credits Purchased

Location of Nitrates Offset land

Applicant

Local Planning Authority of Applicant

Development

Planning Ref Number

Affected Fluvial Catchment

Affected River Basin

Invoice

We confirm that: Other than the Local Planning Authority of the Applicant or a successor in title of the Applicant, a person who is not a party to this letter shall not have any rights under or in connection with it.... For the avoidance of doubt where this vesting certificate relates to outline planning permission these credits will apply to any reserved matters granted pursuant to the outline planning permission but not to any variation resulting in grant of a new permission.'

## **New** Multiple benefits

- 6.28. **New** Suitable mitigation measures might include constructed wetlands, changes in land management, or retrofitting Sustainable Urban Drainage systems within the catchment of the impacted site(s).
- 6.29. **New** Mitigation may also entail the creation of new wetlands, woodland or grasslands. This provides the additional benefit of creating new spaces for nature and recreation as well as offering potential new income streams for landowners.
- 6.30. **New** The Council’s Green Infrastructure Assessment 2023 (Green Infrastructure (GI) refers to “the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places<sup>66</sup>”) **SD20.2** Some of the benefits of green infrastructure, include the enhancement of water quality. More specifically, the section ‘Promote the protection and enhancement of river corridors’ 3.24 advises: A catchment-based approach is required to deliver enhancements to river corridors within the county. Key to this principle is the promotion of collaborative working, including as part of the Nutrient Management Plan Boards established for the Cleddau, Teifi and Tywi to deliver actions and achieve conservation targets. Opportunities to restore the riparian zone, utilise tree planting and improve the management of agricultural land should be explored as mechanisms to reduce diffuse pollution. Improvements to land management practices and riparian habitat restoration also offer the potential to reduce phosphorus concentrations in watercourses. Policy recommendation: A buffer should also be applied around the watercourses on the Development Plan Proposals Map which currently exhibit low levels of ecosystem resilience as an approach to promote the protection and enhancement of these corridors. The locations that require particular focus are the Eastern and Western Cleddau, the Milford Haven Waterway, the Teifi Estuary and Carmarthen Bay. The proposed extent of these buffers should be explored through appropriate feasibility studies and ground truthing.
- 6.31. **New** The Local Development Plan 2 policies that support this recommendation are:

### **New** Table 59 Examples of Green Infrastructure Assessment support in Local Development Plan 2 policy

Policy Reference	Text or text summary
SP 12 Maintaining and Enhancing the Natural Environment	Policy: ....All development proposals will be required to protect, conserve and enhance the natural environment, including: ...Protecting natural landscape features including trees, woodland and hedgerows;

<sup>66</sup> <https://www.pembrokeshirecoast.wales/pembrokeshire-green-infrastructure-assessment/overview-of-the-green-infrastructure-assessment/>

Policy Reference	Text or text summary
	<p>....Delivering net biodiversity gain. All development proposals are required to incorporate new opportunities to enhance the condition, extent and/or connectivity of environmental features to improve the functioning and resilience of ecosystems, or to improve appropriate access to green infrastructure....</p>
GN 13 Residential Development	<p>Para 5.88 - reference to buffers around wildlife corridors around wildlife corridors and SuDS.</p>
GN 44 Biodiversity, Ecological Networks, Habitats and Species	<p>Policy - Protection of features with green infrastructure value.</p>
	<p>Para 5.251 – Protection and extension of connectivity corridors including rivers. 5.256a All applications will be required to submit a Green Infrastructure Statement.</p>
	<p>5.256c Biodiversity enhancements must be secured primarily on or immediately adjacent to the site and can include the planting of native trees or hedgerows, green roofs, wildflower meadows or grassland for wildlife or wetland creation. For larger scale developments, wider landscape measures may include the creation of species rich meadows, woodland expansion and improvement of linkages between existing green infrastructure.</p>
GN 45 Green Infrastructure	<p>Policy requiring a positive impact on the County's Green Infrastructure.</p>
	<p>Paragraph 5.257 refers to river corridors; Sustainable Urban Drainage Systems (SUDS) provision; Nature-based solutions to provide flood attenuation and improve water quality;</p>
GN 47 Water Quality and Protection of Water Resources (to be renamed Policy SP 12A)	<p>Policy: Criterion 2. Safeguarding watercourses through use of ecological buffer zones or corridors, protecting and where possible enhancing riparian habitats and species and water quality;</p>
	<p>Paragraph 5.278 The Council will continue to collaborate with and consult with Natural</p>

Policy Reference	Text or text summary
	<p>Resources Wales and Dwr Cymru Welsh Water on future development proposals, particularly (but not exclusively) those in and close to river corridors and estuaries. Prospective developers should seek the advice and consent of NRW whenever appropriate / necessary.</p> <p>5.279 An appropriate buffer adjoining both banks of a river and / or stream should be incorporated into any proposals to protect and encourage local biodiversity.</p> <p>The requirement is generally for an 8 metre buffer on each side of the channel where proposals relate to a main river, and 7 meters on each side of the channel where proposals relate to an ordinary watercourse.</p>
GN 52 Protection of Open Spaces with Amenity Value	<p>5.292 This policy seeks to protect open space which has local amenity value, for example because of its appearance or character. Such spaces can be gardens, civic spaces, cemeteries, green corridors, green infrastructure, and green spaces around buildings, village greens and land which helps to establish the setting for a settlement.</p>

## 8.7. The Integrity Test - Conclusion

- 7.1. If the mitigation measures described in Chapter 6 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:

**Table 60 SACs and SPAs screened In**

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 Bosherton Lakes SAC	Pembrokeshire Marine SAC
North Pembrokeshire Woodlands SAC	Afonydd Cleddau SAC
Skomer Skokholm and Seas off Pembrokeshire SPA	Northwest Pembrokeshire Commons SAC

- 8.1. All Plans and Policies will be mitigated if the measures described in Chapter 5 can be imposed and implemented. Individual allocations-sites 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.
- 8.2. As such, the mitigation above avoids adverse effects on designated sites for the aforementioned impact pathways.

## 9.8. In Combination Assessment

### Consideration of other policies

- 8.1. 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'.
- 8.2. There is therefore no requirement for an in-combination assessment at this stage of the assessment.
- 8.3. **New:** When considering in-combination effects in relation to air and water pollutants for nitrogen emissions development needs to be nutrient neutral in the Pembrokeshire Marine - Milford Haven inner SAC. Therefore, there can be no net increase in nitrogen in this section of the SAC. This means that although STW's are releasing nitrogen in their outfalls -the amount of nitrogen being released has been calculated using the nutrient budget calculator (and permit levels for particular STW) -this calculated amount plus a precautionary buffer will be removed through various forms mitigation either upstream of the outfall, when the outfall is on the SAC or upstream of the SAC when the outfall releases into a river which then drains into SAC (the level of nitrogen will be reduced in the water body before the additional load from the development reaches the SAC so there is no net increase). In the HRA all sites listed as sensitive to Nitrogen deposition for air quality are located in the Milford Haven inner section of the Marine SAC where nitrogen neutrality is required. Therefore, there will be no in-combination effects from air deposition and water emissions.

### Consideration of other plans or projects

- 8.4. 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.
- 8.5. Both Pembrokeshire Coast National Park LDP2 HRA (dated September 2018)<sup>67</sup> the current Ceredigion adopted LDP<sup>68</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>69</sup>

<sup>67</sup> [LDP2HRA-CONSULTATION-FINAL-DRAFT-5-02-18.pdf \(pembrokeshirecoast.wales\)](#)

<sup>68</sup> <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>69</sup> <https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/integrated-sustainability-appraisal-and-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.

- 8.6. 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>70</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).
- 8.7. **New:** The recently published Nutrient Management Plans for the Affonydd Cleddau and Afon Teifi provide a catchment and partnership-based approach to considering and dealing with the implications of nutrient loading for the riverine SACs. Its findings and approach are dealt with under Water Quality: Phosphorous in Chapter 5.
- 8.8. **New:** The Afon Teifi Nutrient Management Plan takes account of anticipated loads for housing from Ceredigion, Carmarthenshire and Pembrokeshire in providing recommendations for mitigation.
- 8.9. **New:** The Carmarthenshire Local Development Plan 2 Habitats Regulations Assessment Addendum (Feb 2023)<sup>71</sup> also provides a commentary at paragraph 3.63. The nutrient budget estimate figures (high level) which are relevant to Pembrokeshire cover the Teifi SAC. The text refers to 'allocations' figures with the loads showing for an 8 mg/l limit and then a 5 mg/l permit level. Pembrokeshire shows 63.77kg of TP per year with an 8mg/l limit and a 41.63kg of TP per year with a 5mg/l limit. The totals for the three planning authorities are 1054.72 kg of TP per year with an 8 mg/l limit and a 728.37 kg of TP per year with a 5mg/l limit.
- 8.10. **New:** The Nutrient Management Plan for the Teifi August 2025 provides updated figures on a sub catchment basis. Sub-catchment 10 has a figure for 0.01 Metric Tonnes per annum which is the equivalent of 10 kg TP per annum – See Appendix E Figure 7 Waterfall Chart. The figures from the calculations of the Pembrokeshire Local Development Plan 2 phosphorous loads in Chapter 5 of this Habitats Regulations Assessment show an estimated figure of 0.003 Metric Tonnes contribution from Pembrokeshire (an estimated 3 kg per annum) for sub-catchment 10. Windfalls are an estimated 0.01<sup>57</sup> metric

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<sup>70</sup> <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>

<sup>71</sup> <https://www.carmarthenshire.gov.wales/media/1231221/hra-addendum-2nd-rldp.pdf>

tonnes (an estimated 1520 kgs per annum). Sub-catchment 11 in the Teifi Nutrient Management Plan has an estimated figure of 0.07 Metric Tonnes per annum which is 6870kg per annum. Housing Allocations and housing commitments for Pembrokeshire total an estimated 0.05 metric tonnes of TP per annum, the equivalent in kg being 50 kg. Windfalls are an estimated 1820kg.

- 8.11. **New:** Nutrient management at a river catchment level using the integrated/fair share approach provides for safeguarding the integrity of sites. If this is not achievable in practice then nutrient neutrality is required. The mitigation proposed in Chapter 5 regarding amending the policy framework of the Plan, namely the extensive edits to Policy GN 47 Water Quality and Water Resources to be renamed Policy 12A will provide sufficient safeguards and checks are in place to avoid adverse effects to site integrity.
- 8.12. **New:** The Afonydd Cleddau Nutrient Management Plan does not include nutrient load figures for the Pembrokeshire Local Development Plan housing land supply. This has now been set out in detail in Chapter 5 of this Habitats Regulations Assessment under each of the sub-catchments along with the need for appropriate mitigation. Again, the policy framework of the Pembrokeshire Local Development Plan 2 is proposed for amendment to reflect the fair share approach/integrated approach to mitigation. The Afonydd Cleddau Catchment is shared with the Pembrokeshire Coast National Park Authority and Carmarthenshire County Council in a limited way. Pembrokeshire Coast National Park Local Development Plan 2 and Carmarthenshire Local Development Plan 2 have no allocations within the affected Afonydd Cleddau catchment. For windfall there is 1 rural centre in the National Park - Rosebush. This equates to the provision of 3 dwellings in the settlement and 5 in the countryside using the same windfall calculation approach used for the Pembrokeshire Local Development Plan 2. For Carmarthenshire there is small proportion of the Glandy Cross settlement boundary in the catchment and overall, only 0.2% of the overall Carmarthenshire local planning authority area so a windfall calculation is not considered necessary. Also to note Carmarthenshire's Local Development Plan 2 does not attribute any load to the Cleddau catchment.
- 8.13. **New:** Again, the fair share/integrated approach ~~which~~ is a requirement for each planning authority (see paragraph 8.11 above).
- 8.14. The Pembrokeshire Coast National Park Authority, ~~and~~ Ceredigion County Council and Carmarthenshire County Council are required to undertake similar assessments for new development proposals under their respective adopted Local Development Plans.
- 8.15. The Pembrokeshire Local Development Plan 2 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.

8.16. In line with the above, there is therefore no requirement to undertake a full in-combination assessment.

**Appendix A HRA Stage 1 Screening Initial Review**

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

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
Afonydd Cleddau SAC	3260 Water courses of plain to montane levels with the <i>Ranunculon fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation – favourable (maintained) 7110 Active raised bogs – unfavourable (unclassified) 91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) – unfavourable (unclassified) 1096 Brook lamprey <i>Lampetra planeri</i> – unfavourable (unclassified) 1099 River lamprey <i>Lampetra fluviatilis</i> – unfavourable (unclassified) 1163 Bullhead <i>Cottus gobio</i> – unfavourable (unclassified) 1355 Otter <i>Lutra lutra</i> – favourable (maintained) 1095 Sea lamprey <i>Petromyzon marinus</i> – unfavourable (unclassified)	HSG/149/LDP2/1	HSG/030/LDP/01	There are 35 residential allocations, 40 commitment sites and 30 allocations within 10km of this site.  Atmospheric Pollution A road adjacent to site. 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. – Credible risk of LSE – screen in.  AA taken forward.  Water quality (NN, pollution) <u>Phosphates:</u> 15 residential allocations have been identified within the catchment. <u>See paragraph 1.17.1 and table 5.3 for details. 13-14 non-residential allocations have been identified within the catchment. One Transport scheme. 5 commitments: with outstanding Discharge of Condition /other planning requirement in the catchment. See Error! Reference source not found. onwards.</u>  <u>Nitrogen: 38 residential allocations sites have been screen in. 20 commitment sites, 31 other allocations and 2 transport schemes.</u>  Construction of new development could lead to an increase in sediment and contaminants into the Afon Cleddau degrading the environmental quality of the 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 fertilizer may lead to an increase of nutrients to the site.  Functionally Linked Land / Indirect Habitat Loss Included as a precaution as habitat degradation may occur through construction phases of the allocations reducing the quality of functionally linked land supporting the features of the site. No direct habitat loss is predicted.  Recreation 26 residential allocations are located within 7km of the site with a total of <u>1345</u> units. <u>3544</u> commitments in total are located within 7km of the site with a total of
		S/HSG/040/LDP2/6	HSG/132/LDP2/1	
		HSG/022/LDP2/1	HSG/063/00024	
		HSG/040/LDP2/1	HSG/048/00038	
		HSG/029/00014	HSG/048/LDP2/1	
		HSG/113/LDP2/01	HSG/135/LDP2/1	
		HSG/119/LDP2/1	HSG/040/LDP2/3	
		HSG/060/LDP2/1	HSG/093/00066	
		HSG/120/00018	HSG/088/LDP2/1	
		HSG/088/LDP2/1	HSG/043/LDP2/1	
		HSG/081/LDP2/1	HSG/047/LDP2/1	
		HSG/029/LDP2/1	HSG/049/LDP2/1	
		HSG/049/LDP2/1	HSG/114/LDP/01	
		HSG/114/LDP/01	EMP/053/00001	
		HSG/040/LDP2/3	S/EMP/136/00001	
		HSG/152/LDP2/1	EMP/034/00006	
		S/HSG/034F/LDP2/1	S/EMP/000/00003	
		HSG/053/LDP2/1	S/EMP/000/00007	
		HSG/030/LDP/01	<a href="#">MXU/040/01</a>	
		HSG/132/LDP2/1	<a href="#">SSA/135/LDP2/01</a>	
HSG/048/LDP2/1	<a href="#">S/EMP/000/00004</a>			
HSG/006/00003	<a href="#">S/EMP/000/00003</a>			
HSG/048/00038	<a href="#">CF/086/LDP2/1</a>			
HSG/063/00024	<a href="#">EMP/146/00001</a>			
HSG/003/LDP2/1	<a href="#">EMP/030/LDP2/01</a>			
HSG/135/LDP2/1	<a href="#">EMP/000/LDP2/01</a>			
HSG/053/LDP2/01	<a href="#">GT/003/LDP2/01</a>			
HSG/113/LDP2/1	040-00373			
HSG/040/LDP2/1	000/01202			
HSG/053/LDP2/01	003/00025			
HSG/029/00014	003/00040			
HSG/029/LDP2/1	028/00012			
HSG/081/LDP2/1	029/00013			
HSG/119/LDP2/1	029/00026			
HSG/149/LDP2/1	030/00019			
HSG/120/00018	030/00043			
HSG/113/LDP2/1	<a href="#">033/00035</a>			

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
		HSG/152/LDP2/1	034/00099	<p><a href="#">374607</a> units</p> <p>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 <a href="#">4126308</a>. LSE is predicted.</p> <p>Disturbance – noise and sound</p> <p>Construction works located directly adjacent to the site and associated tributaries may lead to noise and visual disturbance to otters. As otters are highly mobile and travel up to 20km and raise young away from water courses, the temporary disturbance of otter via construction works it not anticipated.</p> <p>As no works are planned to the water course itself, aquatic features have been screened out.</p>
		HSG/060/LDP2/1	<a href="#">034/00165</a>	
		HSG/022/LDP2/1	034/00292	
		<a href="#">HSG/050/LDP2/1</a>	035/00021	
		<a href="#">HSG/086/LDP2/1</a>	035/00030	
		<a href="#">HSG/086/LDP2/2</a>	040/00077	
		<a href="#">HSG/086/LDP2/7</a>	040/00106	
		<a href="#">HSG/099/LDP2/1</a>	040/00373	
		<a href="#">S/HSG/086/LDP2/3</a>	040/00397	
		S/EMP/040/00012	040/00430	
		S/EMP/040/00005	<a href="#">040/00431</a>	
		S/EMP/040/00015	040/00445	
		S/EMP/040/00011	042/00013	
		S/EMP/040/00004	044/00015	
		S/EMP/040/00001	044/00050	
		EMP/040/LDP2/01	044/00063	
		EMP/088/LDP/01	048/00017	
		S/EMP/034/LDP/02	053/00009	
		S/EMP/034/00003	<a href="#">053/00034</a>	
		S/EMP/086/00003	053/00052	
		S/EMP/086/LDP2/01	081/LDP/01	
		EMP/132/LDP2/01	085/00022	
		EMP/093/00001	088/00074	
		EMP/030/00001	088/00077	
		S/EMP/136/00001	<a href="#">088/00360</a>	
		SPV/149/LDP2/01	110/00015	
		S/EMP/040/00001	119/00028	
		EMP/040/LDP2/01	119/00030	
		S/EMP/040/00004	119/LDP/01	
		GT/040/LDP2/01	131/00021	
		S/EMP/040/00011	<a href="#">007/00047</a>	
		S/EMP/040/00015	<a href="#">050/00043</a>	
		S/EMP/040/00005	<a href="#">086/00129</a>	
		S/EMP/040/00012	<a href="#">086/00223</a>	
		EMP/088/LDP/01	<a href="#">086/00282</a>	
		EMP/034/00006	<a href="#">099/00045</a>	
		SSA/088/LDP2/01	CF/040/01	
		EMP/053/00001	CF/086/LDP2/1	
		EMP/132/LDP2/01	MXU/040/01	
		SPV/149/LDP2/01	EMP/000/LDP2/01	
		S/HSG/034F/LDP2/1	EMP/030/LDP2/01	

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
		S/HSG/040/LDP2/6	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 style="list-style-type: none"> <li>• 3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation – favourable (maintained)</li> <li>• 3130 Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or of the <i>Isoëto-Nanojuncetea</i> – favourable (unclassified):</li> <li>• 1096 Brook lamprey <i>Lampetra planeri</i> – unfavourable (unclassified) reduced oxygen due to eutrophication</li> <li>• 1099 River lamprey <i>Lampetra fluviatilis</i> – unfavourable (unclassified)</li> <li>• 1106 Atlantic salmon <i>Salmo salar</i> – unfavourable (unclassified)</li> <li>• 1163 Bullhead <i>Cottus gobio</i> – unfavourable (unclassified)</li> <li>• 1355 Otter <i>Lutra lutra</i> – favourable (maintained)</li> <li>• 1831 Floating water-plantain <i>Luronium natans</i> – favourable (maintained) - eutrophication is an indication of unfavourable condition.</li> <li>• 1095: Sea lamprey <i>Petromyzon marinus</i> – unfavourable (unclassified)</li> </ul>	<p>HSG/122/00035 HSG/020/LDP2/1 HSG/006/00003 HSG/030/LDP/01 EMP/030/00001 EMP/030/LDP2/01 MN/000/LDP2/001 007/00047 131/00021 030/00043 042/00013 030/00019 <a href="#">033/00035</a></p>		<p>There are 4 residential allocations, <a href="#">56</a> commitment sites, 2 other allocations and 1 mineral allocations within 10km of the site.</p> <p>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) <b>Phosphates:</b> Two allocations have been identified within the Teifi catchment. See <b>New</b> Table 25 onwards. 1 <b>commitment</b> has been identified. 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. Recreation 4 residential allocations are located within 7km of the site with a total of 112 units. 5 residential commitment sites are located within 7km of the site with a total of <a href="#">61404</a> 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 <a href="#">415</a> 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.</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
Bristol Channel SAC	1351: harbour porpoise ( <i>Phocoena phocoena</i> )	HSG/050/LDP2/1 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/003/LDP2/1 HSG/047/LDP2/1 HSG/096/LDP2/3 HSG/088/LDP2/1 EMP/000/LDP2/01 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/096/00006 S/EMP/096/00001	<a href="#">EMP/000/LDP2/01</a> <a href="#">EMP/132/LDP2/01</a> <a href="#">SSA/089/01</a> <a href="#">SSA/89/LDP2/01</a> <a href="#">MXU/095/LDP2/01</a> <a href="#">GT/095/LDP2/1</a> <a href="#">GT/095/LDP2/2</a> <a href="#">S/EMP/096/00004</a> <a href="#">S/EMP/096/00005</a> <a href="#">S/EMP/096/00006</a> <a href="#">S/EMP/096/00004</a> <a href="#">S/EMP/096/00007</a> 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 <a href="#">SPV/066/LDP2/01</a> <a href="#">SSA/089/LDP2/01</a> <a href="#">050/00043</a> <a href="#">099/00045</a> <a href="#">123/00045</a> <a href="#">003/00040</a> <a href="#">003/00025</a> <a href="#">095/00240</a> <a href="#">015/00024</a> <a href="#">015/00022</a> <a href="#">095/00147</a> <a href="#">025/00028</a> <a href="#">095/00180</a> <a href="#">110/00015</a> <a href="#">046/00015</a> <a href="#">096/00373</a> <a href="#">125/00009</a> <a href="#">011/00011</a> <a href="#">012/00004</a> <a href="#">088/00074</a>	<p>There are 21 residential allocations, <u>19</u> commitment sites and 17 other allocations within 10km of the site.</p> <p>Atmospheric Pollution          Site is not located within 200m of any roads. As such, no credible risk that LSE is predicted</p> <p>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</p> <p>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.</p> <p>Recreation          15 residential allocations are located within 7km of the site with a minimum total of <u>550</u> units.  <u>12</u> residential commitment sites are located within 7km of the site with a minimum total of <u>160</u> 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 <u>1704</u> -LSE is predicted.</p> <p>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.          As the site is marine, all terrestrial allocations will not result in LSE via disturbance pathways.</p>

Designated Site	Designated Features	Allocations	& Commitments within 10km thresholds	Impacts
			<a href="#">088/00077</a> <a href="#">088/00360</a> <a href="#">096/00230</a> <a href="#">096/00274</a> <a href="#">096/00375</a>	
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/136/00001 S/EMP/034/LDP/02 S/EMP/034/00003 S/EMP/040/00001 EMP/040/LDP2/01 S/EMP/000/00003 SSA/135/LDP2/01 S/EMP/000/00007 S/EMP/086/LDP/01 SPV/066/LDP2/01 S/EMP/000/00002 S/EMP/086/00003 S/EMP/096/00002 <a href="#">S/EMP/095/00001</a> <a href="#">S/EMP/000/00004</a> <a href="#">S/EMP/086/LDP2/01</a> <a href="#">S/EMP/096/00003CF/086/LDP2/1</a> <a href="#">HSG/095/LDP2/1</a> <a href="#">HSG/046/LDP2/1</a> <a href="#">HSG/096/LDP2/2</a> <a href="#">HSG/096/00238</a> <a href="#">S/EMP/096/00003</a> <a href="#">MXU/040/01</a> <a href="#">GT/095/LDP2/2</a>	<a href="#">S/EMP/095/00001</a> <a href="#">S/EMP/000/00004</a> <a href="#">S/EMP/086/LDP2/01</a> <a href="#">S/EMP/096/00003</a> <a href="#">CF/086/LDP2/1</a> <a href="#">HSG/095/LDP2/1</a> <a href="#">HSG/046/LDP2/1</a> <a href="#">HSG/096/LDP2/2</a> <a href="#">HSG/096/00238</a> HSG/066/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/LDP2/3 HSG/040/LDP2/1 S/HSG/040/LDP2/6 HSG/053/LDP2/1 HSG/114/LDP/01 EMP/146/00001 TS/LDP2/03 HSG/096/LDP2/3 <a href="#">HSG/049/LDP2/1</a> <a href="#">HSG/020/LDP2/1</a> <a href="#">034/00292</a> <a href="#">034/00099</a> <a href="#">034/00165</a> <a href="#">034/00165</a> <a href="#">028/00012</a> <a href="#">085/00022</a> <a href="#">119/00028</a> <a href="#">119/00030</a>	<p>There are 27 residential allocations, <u>27</u> commitment sites and 24 other allocations within 10km of the site.</p> <p>Atmospheric Pollution  Site is not located within 200m of any roads. As such, no credible risk of LSE is predicted.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Fishguard Harbour is located directly adjacent to the site.</p> <p>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.</p> <p>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.</p> <p>Recreation  10 residential allocations are located within 7km of the site with a minimum total of 482 units.</p> <p><u>13</u> commitment sites are located within 7km of the site with a minimum total of <u>165</u> 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 <u>1553</u>. LSE is predicted.</p>

Designated Site	Designated Features	Allocations <u>&amp; Commitments</u> within <u>10km</u> thresholds		Impacts
		<a href="#">GT/095/LDP2/1</a> <a href="#">CF/086/LDP2/1</a>	<a href="#">119/LDP/01</a> <a href="#">086/00377</a> <a href="#">086/00381</a> <a href="#">086/00378</a> <a href="#">125/00009</a> <a href="#">086/00223</a> <a href="#">086/00282</a> <a href="#">053/00009</a> <a href="#">033/00035</a> <a href="#">086/00129</a> <a href="#">053/00034</a> <a href="#">053/00052</a> <a href="#">040/00373</a> <a href="#">000/01202</a> <a href="#">046/00015</a> <a href="#">040/00431</a> <a href="#">048/00017</a> <a href="#">040/00397</a> <a href="#">040/00106</a> <a href="#">040/00077</a> <a href="#">040/00445</a> <a href="#">095/00180</a> <a href="#">095/00147</a> <a href="#">096/00373</a> <a href="#">040/00430</a>	
Carmarthen Bay Dunes SAC	<ul style="list-style-type: none"> <li>• 2110 Embryonic shifting dunes</li> <li>• 2120 "Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")"</li> <li>• 2130 "Fixed coastal dunes with herbaceous vegetation ("grey dunes")" * Priority feature</li> <li>• 2170 Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)</li> <li>• 2190 Humid dune slacks</li> <li>• 1014 Narrow-mouthed whorl snail <i>Vertigo angustior</i></li> <li>• 1395 Petalwort <i>Petalophyllum ralfsii</i></li> <li>• 1903 Fen orchid <i>Liparis loeselii</i></li> </ul>		<a href="#">EMP/000/LDP2/01</a> <del>No allocations</del> <del>But</del> major road located within 200m of the European site	<p><a href="#">There is 1 allocation within 10km of the site.</a></p> <p>Atmospheric Pollution  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.</p> <p>Disturbance – noise and sound  <del>1</del> <del>No</del> <del>allocation</del> <del>s</del> within 10km of the site. No LSE predicted.  Functionally Linked Land / Indirect Habitat Loss  <del>1</del> <del>allocation</del> <del>No</del> <del>allocations</del> within 10km of the site. No LSE predicted.</p> <p>Recreation  No allocations within 7km of the site. No LSE predicted.  <a href="#">No Commitments within 7km of the site</a></p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
Carmarthen Bay SAC	<p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1349 Bottlenose dolphin <i>Tursiops truncatus</i></li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <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> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1095 Sea lamprey <i>Petromyzon marinus</i></li> <li>1099 River lamprey <i>Lampetra fluviatilis</i></li> <li>1364 Grey seal <i>Halichoerus grypus</i></li> </ul>	<p>SSA/089/01 SSA/089/LDP2/01 EMP/132/LDP2/01 EMP/000/LDP2/01 EMP/088/LDP/01 HSG/132/LDP2/1 HSG/047/LDP2/1 HSG/050/LDP2/1 HSG/099/LDP2/1 HSG/123/LDP/01 HSG/003/LDP2/01 GT/003/LDP2/01 SSA/088/LDP2/01 SSA/089/LDP2/01 <a href="#">050/00043</a> <a href="#">099/00045</a> <a href="#">003/00040</a> <a href="#">003/00025</a> <a href="#">123/00045</a> <a href="#">110/00015</a> <a href="#">015/00022</a> <a href="#">015/00024</a> <a href="#">088/00074</a> <a href="#">088/00360</a> <a href="#">088/00077</a> <a href="#">HSG/003/LDP2/1</a> <a href="#">HSG/088/LDP2/1</a></p>		<p>There are 7 residential allocations, <u>8</u> commitment <u>sites and 7 other allocations within 10km of the site.</u></p> <p>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</p> <p>Water quality (pollution) 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 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. As such, LSE is predicted for fish species.</p> <p>Functionally Linked Land / Indirect Habitat Loss As the site features are marine, no LSE is predicted.</p> <p>Recreation <u>6</u> residential allocations are located within 7km of the site with a minimum total of 118 units. <u>5</u> commitment sites are located within 7km of the site with a minimum total of <u>66</u> 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 <u>442</u>. LSE is predicted.</p> <p>Disturbance The site is sufficiently distant from all allocations such that no LSE is predicted.</p>
Pembrokeshire Marine SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <p>Annex I Primary habitats:</p> <ul style="list-style-type: none"> <li>1130 Estuaries</li> <li>1160 Large Shallow inlets and bays</li> <li>1170 Reefs</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1110 Sandbanks which are slightly covered by sea water all the time</li> <li>1140 Mudflats and sandflats not covered by seawater at low tide</li> <li>1150 Coastal lagoons * Priority feature</li> </ul>	<p>HSG/029/00014 HSG/029/LDP2/1 HSG/040/LDP2/1 S/HSG/040/LDP2/6 HSG/040/LDP2/3 HSG/043/LDP2/1 HSG/046/LDP2/1 HSG/047/LDP2/1 HSG/048/00038 HSG/048/LDP2/1 HSG/052/00011 HSG/052/LDP2/1</p>	<p><a href="#">HSG/132/LDP2/1</a> <a href="#">HSG/135/LDP2/1</a> <a href="#">HSG/050/LDP2/1</a> <a href="#">S/HSG/086/LDP2/3</a> <a href="#">HSG/152/LDP2/1</a> <a href="#">HSG/060/LDP2/1</a> <a href="#">HSG/120/00018</a> <a href="#">S/EMP/000/00007</a> <a href="#">MXU/040/01</a> <a href="#">S/EMP/040/00001</a> <a href="#">S/EMP/086/LDP/01</a> <a href="#">SSA/135/LDP2/01</a></p>	<p>There are 47 residential allocations, <u>44</u> commitment <u>sites and 38 other allocations within 10km of the site.</u></p> <p>Atmospheric Pollution 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. 1924 units, giving rise to additional traffic flows. At A477 – road crosses site – small area. LSE is predicted. See AA</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
	<ul style="list-style-type: none"> <li>1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)</li> <li>8330 Submerged or partially submerged sea caves</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1364 Grey seal <i>Halichoerus grypus</i></li> <li>1441 Shore dock <i>Rumex rupestris</i></li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> <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/063/00024 HSG/066/LDP2/1 HSG/086/00222 HSG/086/LDP2/1 HSG/086/LDP2/2 HSG/086/LDP2/4 HSG/086/LDP2/5 HSG/086/LDP2/6 HSG/086/LDP2/7 HSG/093/00066 HSG/095/00144 HSG/095/LDP2/1 HSG/095/LDP2/2 HSG/095/LDP2/4 HSG/095/LDP2/5 HSG/096/00238 HSG/096/LDP2/1 HSG/096/LDP2/2 HSG/099/LDP2/1 HSG/113/LDP2/01 HSG/119/LDP2/1 HSG/123/LDP/01 HSG/114/LDP/01 HSG/049/LDP2/1 HSG/088/LDP2/1 HSG/003/LDP2/1 HSG/022/LDP2/1 HSG/096/LDP2/3 HSG/132/LDP2/1 HSG/135/LDP2/1 HSG/050/LDP2/1 S/HSG/086/LDP2/3 HSG/152/LDP2/1 HSG/060/LDP2/1 HSG/120/00018 S/EMP/000/00007 MXU/040/01 S/EMP/040/00001 S/EMP/086/LDP/01 SSA/135/LDP2/01 SPV/066/LDP2/01	<a href="#">SPV/066/LDP2/01</a> <a href="#">EMP/132/LDP2/01</a> <a href="#">MXU/095/LDP2/01</a> <a href="#">EMP/093/00001</a> <a href="#">S/EMP/000/00003</a> <a href="#">S/EMP/000/00002</a> <a href="#">S/EMP/086/00003</a> <a href="#">S/EMP/096/00002</a> <a href="#">S/EMP/095/00001</a> <a href="#">S/EMP/096/00007</a> <a href="#">S/EMP/096/00004</a> <a href="#">S/EMP/096/00005</a> <a href="#">S/EMP/096/00006</a> <a href="#">S/EMP/040/00011</a> <a href="#">S/EMP/040/00012</a> S/EMP/000/00004 S/EMP/040/00015 S/EMP/086/LDP2/01 EMP/040/LDP2/01 S/EMP/040/00004 S/EMP/096/00003 S/EMP/096/00001 EMP/088/LDP/01 CF/086/LDP2/1 GT/095/LDP2/1 GT/095/LDP2/2 EMP/146/00001 GT/040/LDP2/01 SSA/088/LDP2/01 GT/003/LDP2/01 TS/LDP2/03 GT/095/LDP2/02 <a href="#">096/00375</a> <a href="#">086/00377</a> <a href="#">012/00004</a> <a href="#">096/00274</a> <a href="#">095/00180</a> <a href="#">044/00063</a> <a href="#">095/00147</a> <a href="#">044/00015</a> <a href="#">086/00381</a>	<p>Water Quality</p> <p>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.</p> <p>As such, LSE is predicted for all designated features.</p> <p>Recreation</p> <p>43 residential allocations are located within 7km of the site with a minimum total of 2095 units. 42 commitment sites are located within 7km of the site with a minimum total of 485 units.</p> <p>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 6192. LSE is predicted.</p> <p>Functionally Linked Land / Indirect Habitat Loss</p> <p>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.</p> <p>Disturbance</p> <p>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.</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
		EMP/132/LDP2/01	<a href="#">040/00430</a>	
		MXU/095/LDP2/01	<a href="#">086/00378</a>	
		EMP/093/00001	<a href="#">011/00011</a>	
		S/EMP/000/00003	<a href="#">015/00024</a>	
		S/EMP/000/00002	<a href="#">096/00230</a>	
		S/EMP/086/00003	<a href="#">096/00373</a>	
		S/EMP/096/00002	<a href="#">015/00022</a>	
		S/EMP/095/00001	<a href="#">025/00028</a>	
		S/EMP/096/00007	<a href="#">044/00050</a>	
		S/EMP/096/00004	<a href="#">040/00445</a>	
		S/EMP/096/00005	<a href="#">086/00282</a>	
		S/EMP/096/00006	<a href="#">046/00015</a>	
		S/EMP/040/00011	<a href="#">040/00077</a>	
		S/EMP/040/00012	<a href="#">035/00030</a>	
		<a href="#">SSA/089/01</a>	<a href="#">035/00021</a>	
		<a href="#">SSA/089/LDP2/01</a>	<a href="#">095/00240</a>	
		<a href="#">S/EMP/040/00005</a>	<a href="#">040/00397</a>	
			<a href="#">040/00106</a>	
			<a href="#">040/00431</a>	
			<a href="#">086/00223</a>	
			<a href="#">040/00373</a>	
			<a href="#">086/00129</a>	
			<a href="#">029/00026</a>	
			<a href="#">029/00013</a>	
			<a href="#">028/00012</a>	
			<a href="#">048/00017</a>	
			<a href="#">119/00028</a>	
			<a href="#">119/00030</a>	
			<a href="#">119/LDP/01</a>	
			<a href="#">125/00009</a>	
			<a href="#">123/00045</a>	
			<a href="#">110/00015</a>	
			<a href="#">088/00077</a>	
			<a href="#">088/00360</a>	
			<a href="#">088/00074</a>	
			<a href="#">099/00045</a>	
			<a href="#">003/00025</a>	
			<a href="#">003/00040</a>	
			<a href="#">000/01202</a>	
			<a href="#">050/00043</a>	
			<a href="#">085/00022</a>	

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds	Impacts
Cardigan Bay SAC	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <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> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>• 1349 Bottlenose dolphin <i>Tursiops truncatus</i></li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> <li>• 1095 Sea lamprey <i>Petromyzon marinus</i></li> <li>• 1099 River lamprey <i>Lampetra fluviatilis</i></li> <li>• 1364 Grey seal <i>Halichoerus grypus</i></li> </ul>	<p>HSG/122/00035 HSG/020/LDP2/1 <a href="#">033/00035</a></p>	<p>There are 2 residential allocations, <a href="#">No4</a> commitment sites and no allocations within 10km of the site.</p> <p>Atmospheric Pollution No roads located within 200m. No credible risk that LSE predicted.</p> <p><b>Water Quality</b> 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.</p> <p>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.</p> <p>Recreation There are two allocations within 7km of the site. These allocations propose the development of a minimum of 78 dwellings. <a href="#">No commitment sites are within 7km.</a> 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.</p> <p>Grey seals and bottle-nosed dolphins may be disturbed (noise &amp; 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>72</sup>.</p> <p>As such, LSE is predicted for grey seal, bottle-nosed dolphin, sea lamprey, river lamprey, reefs, and sea caves.</p> <p>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.</p> <p>Disturbance All allocations are sufficiently distanced from the coast. As the designated features are limited to the marine or coast environment, no LSE is predicted.</p>
Gweunydd Blaencleddau SAC	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>• 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</li> <li>• North Atlantic wet heaths with <i>Erica tetralix</i></li> <li>• Blanket Bog</li> </ul>	<p>HSG/006/00003 HSG/030/LDP/01 HSG/081/LDP2/1 HSG/060/LDP2/1 EMP/030/00001</p>	<p><a href="#">There are 4 residential allocations, 7 commitment sites and 2 other allocations within 10km of the site.</a></p> <p>Atmospheric pollution Site is located near to minor roads, site boundary adjacent in some places. Four discrete locations.</p>

<sup>72</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 \(naturalresources.wales\)](#)

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
	<ul style="list-style-type: none"> <li>Transition Mires and quaking bogs</li> <li>Alkaline fens</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1065 Marsh fritillary <i>Euphydryas aurinia</i></li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> <li>Southern damselfly <i>Coenagrion mercuriale</i></li> </ul>	<p>EMP/030/LDP2/01</p> <p><a href="#">030/00019</a></p> <p><a href="#">030/00043</a></p> <p><a href="#">042/00013</a></p> <p><a href="#">033/00035</a></p> <p><a href="#">131/00021</a></p> <p><a href="#">007/00047</a></p> <p><a href="#">081/LDP/01</a></p>		<p>Scale of residential development in plan policies = only 49 units close to site</p> <p>Increase in traffic may result adjacent to site boundary.</p> <p>Site exceeded – but traffic is not the key source of pollution.</p> <p>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</p> <p>Water Quality</p> <p>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.</p> <p>As such, LSE is predicted.</p> <p>Recreation</p> <p>Three residential allocations are located within 7km of the site with a minimum total of 49 units. <u>6</u> commitment sites are located within 7km of the site with a minimum total of <u>74</u> 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 <u>295</u>. LSE is predicted.</p> <p>Functionally Linked Land / Indirect Habitat Loss</p> <p>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.</p> <p>As such, LSE predicted for marsh fritillary and southern damselfly only.</p> <p>Disturbance</p> <p>All allocations are sufficiently distanced from the site. As such, no LSE is predicted.</p>
Limestone Coast SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts</li> <li>2130 Fixed dunes with herbaceous vegetation (“grey dunes”)</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>4030 European dry heaths</li> <li>6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) / 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</li> </ul>	<p>HSG/123/LDP/01</p> <p>HSG/095/LDP2/5</p> <p>HSG/095/LDP2/2</p> <p>HSG/095/LDP2/1</p> <p>HSG/095/00144</p> <p>HSG/096/LDP2/2</p> <p>HSG/095/LDP2/4</p> <p>HSG/066/LDP2/1</p> <p>HSG/099/LDP2/1</p> <p>HSG/086/LDP2/1</p> <p>HSG/086/LDP2/2</p> <p>S/HSG/086/LDP2/3</p> <p>HSG/086/LDP2/4</p> <p>HSG/086/LDP2/5</p>	<p><a href="#">SSA/089/01</a></p> <p><a href="#">SSA/089/LDP2/01</a></p> <p><a href="#">S/EMP/086/LDP/01</a></p> <p><a href="#">SPV/066/LDP2/01</a></p> <p><a href="#">MXU/095/LDP2/01</a></p> <p><a href="#">S/EMP/000/00003</a></p> <p><a href="#">S/EMP/000/00002</a></p> <p><a href="#">S/EMP/086/00003</a></p> <p><a href="#">S/EMP/096/00002</a></p> <p>S/EMP/095/00001</p> <p>S/EMP/000/00004</p> <p>S/EMP/086/LDP2/01</p> <p>CF/086/LDP2/1</p> <p>GT/095/LDP2/1</p>	<p>There are 29 residential allocations, <u>21</u> commitment <u>sites</u> and 26 <u>other</u> allocations within 10km of the site.</p> <p>Atmospheric Pollution</p> <p>Site is within 200m of a road but there are no qualifying habitats present within this zone of influence.</p> <p>No credible risk of LSE.</p> <p>Water quality</p> <p>The site is not hydrologically connected to any allocations. As such, no LSE is predicted.</p> <p>Recreation</p> <p><u>20</u> residential allocations are located within 7km of the site with a minimum total of <u>884</u> units. <u>12</u> commitment sites are located within 7km of the site with a minimum total of <u>199</u> units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
	<p>caves</p> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i></li> <li>1654 Early gentian <i>Gentianella anglica</i></li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> <li>1395 Petalwort <i>Petalophyllum ralfsii</i></li> </ul>	<p>HSG/086/LDP2/6</p> <p>HSG/086/00222</p> <p>HSG/052/LDP2/1</p> <p>HSG/046/LDP2/1</p> <p>S/EMP/000/00007</p> <p>HSG/052/00011</p> <p>HSG/096/LDP2/3</p> <p><a href="#">HSG/086/LDP2/7</a></p> <p><a href="#">HSG/096/00238</a></p> <p><a href="#">HSG/047/LDP2/1</a></p> <p><a href="#">HSG/096/LDP2/1</a></p> <p><a href="#">HSG/093/00066</a></p> <p><a href="#">HSG/050/LDP2/1</a></p> <p><a href="#">HSG/003/LDP2/1</a></p> <p><a href="#">HSG/135/LDP2/1</a></p> <p><a href="#">HSG/048/00038</a></p> <p><a href="#">SSA/089/01</a></p> <p><a href="#">SSA/089/LDP2/01</a></p> <p><a href="#">S/EMP/086/LDP/01</a></p> <p><a href="#">SPV/066/LDP2/01</a></p> <p><a href="#">MXU/095/LDP2/01</a></p> <p><a href="#">S/EMP/000/00003</a></p> <p><a href="#">S/EMP/000/00002</a></p> <p><a href="#">S/EMP/086/00003</a></p> <p><a href="#">S/EMP/096/00002</a></p>	<p>GT/095/LDP2/2</p> <p>EMP/146/00001</p> <p>GT/003/LDP2/01</p> <p><a href="#">S/EMP/096/00001</a></p> <p><a href="#">S/EMP/096/00003</a></p> <p><a href="#">S/EMP/096/00006</a></p> <p><a href="#">S/EMP/096/00005</a></p> <p><a href="#">SSA/135/LDP2/01</a></p> <p><a href="#">S/EMP/096/00004</a></p> <p><a href="#">S/EMP/096/00007</a></p> <p><a href="#">EMP/093/00001</a></p> <p><a href="#">123/00045</a></p> <p><a href="#">125/00009</a></p> <p><a href="#">086/00377</a></p> <p><a href="#">095/00240</a></p> <p><a href="#">086/00381</a></p> <p><a href="#">086/00378</a></p> <p><a href="#">086/00282</a></p> <p><a href="#">046/00015</a></p> <p><a href="#">095/00147</a></p> <p><a href="#">015/00022</a></p> <p><a href="#">045/00024</a></p> <p><a href="#">095/00180</a></p> <p><a href="#">086/00223</a></p> <p><a href="#">099/00045</a></p> <p><a href="#">096/00373</a></p> <p><a href="#">086/00129</a></p> <p><a href="#">025/00028</a></p> <p><a href="#">096/00230</a></p> <p><a href="#">096/00375</a></p> <p><a href="#">096/00274</a></p> <p><a href="#">050/00043</a></p> <p><a href="#">003/00025</a></p> <p><a href="#">003/00040</a></p> <p><a href="#">012/00004</a></p> <p><a href="#">011/00011</a></p>	<p>residential allocations will result in a population increase of <a href="#">25992943_2088</a> . LSE is predicted.</p> <p>Direct Habitat Loss / functionally linked habitat loss</p> <p>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.</p> <p>Disturbance (noise, visual, and vibration)</p> <p>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.</p>
North Pembrokeshire Woodlands SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</li> </ul>	<p>S/HSG/034F/LDP2/1</p> <p>HSG/053/LDP2/1</p> <p>HSG/006/00003</p>		<p>There are 8 residential allocations, <a href="#">130</a> commitment <a href="#">s</a>-ites and 8 other allocations within 10km of the site.</p> <p>Atmospheric Pollution</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds	Impacts
	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) * Priority feature</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1308 Barbastelle <i>Barbastella barbastellus</i></li> </ul>	<p>EMP/034/00006  EMP/053/00001  S/EMP/136/00001  SPV/149/LDP2/01  S/EMP/034/LDP/02  S/EMP/034/00003  EMP/030/00001  EMP/030/LDP2/01  HSG/081/LDP2/1  HSG/030/LDP/01  HSG/122/00035  HSG/020/LDP2/1  HSG/149/LDP2/1  MN/000/LDP2/001  <a href="#">033/00035</a>  <a href="#">034/00165</a>  <a href="#">034/00165</a>  <a href="#">034/00292</a>  <a href="#">034/00099</a>  <a href="#">007/00047</a>  <a href="#">030/00019</a>  <a href="#">053/00034</a>  <a href="#">030/00043</a>  <a href="#">053/00009</a>  <a href="#">053/00052</a></p>	<p>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.</p> <p>Water Quality  There is no hydrological connectivity between any allocations and the site.  As such, no LSE is predicted.</p> <p>Recreation  Four residential allocations are located within 7km of the site with a minimum of 269 units. 6 commitment sites are located within 7km of the site with a minimum of 74 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 823.</p> <p>Functional linked land  There may be a reduction in suitable barbastelle habitat or roosting sites.  Using the precautionary principle, LSE is predicted for barbastelle.</p> <p>Disturbance  The site is sufficiently distanced from the allocations. As such, no LSE is predicted.</p>
Northwest Pembrokeshire Commons SAC	<p>Annex I habitats that are a primary reason for selection of this site  4030 European dry heaths  7140 Transition mires and quaking bogs</p> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</li> </ul> <p>Annex II species that are a primary reason for selection of this site  1831 Floating water-plantain <i>Luronium natans</i></p>	<p><a href="#">028/00012</a>  <a href="#">085/00022</a>  <a href="#">HSG/114/LDP/01</a></p>	<p>There is 1 residential allocation, 2 commitment sites and no other allocations within 10km of the site.</p> <p>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.  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</p> <p>No LSE is predicted.</p> <p>Water Quality  There is no hydrological connectivity between any allocations and the site.  As such, no LSE is predicted.</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds	Impacts
			<p>Recreation</p> <p>There are no residential allocations within 7km of the site. There is 1 commitment <u>located within 7km of the site with a minimum of 23</u> 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 <u>55</u>. <del>According to the Office for National Statistics, the average household population is 2.4. As such, the total population increase is predicted to be 53-645.</del></p> <p>Functional linked land</p> <p>The Brawdy allocation and two residential allocations are the only allocations located within 10km of the site.</p> <p>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.</p> <p>Disturbance</p> <p>No disturbance is anticipated as the site is sufficiently distant from any allocations.</p>
Preseli SAC	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>4030 European dry heaths</li> <li>7150 Depressions on peat substrates of the <i>Rhynchosporion</i></li> <li>7230 Alkaline fens</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1044 Southern damselfly (<i>Coenagrion mercurial</i>)</li> <li>1065 Marsh fritillary butterfly <i>Euphydryas (Eurodryas, Hypodryas) aurinia</i></li> <li>1393 Slender green feather-moss <i>Drepanocladus (Hamatocaulis) vernicosus</i></li> </ul>	<p>HSG/006/00003  HSG/030/LDP/01  HSG/053/LDP2/1  HSG/081/LDP2/1  HSG/120/00018  S/HSG/034F/LDP2/1  HSG/149/LDP2/1  HSG/060/LDP2/1  HSG/022/LDP2/1  <u>HSG/020/LDP2/1</u>  EMP/034/00006  S/EMP/136/00001  EMP/053/00001  SPV/149/LDP2/01  EMP/030/00001  EMP/030/LDP2/01  MN/000/LDP2/001  <u>030/00019</u>  <u>030/00043</u>  <u>033/00035</u>  <u>081/LDP/01</u>  <u>081/LDP/01</u>  <u>042/00013</u>  <u>007/00047</u></p>	<p>There are 10 residential allocations, <u>10</u> commitment <u>sites</u> and 6 <u>other</u> allocations within 10km of the site.</p> <p>Atmospheric Pollution</p> <p>Site within 200m of road</p> <p>Site is located adjacent to minor roads, (2008 Manual count of only 63 'all motor vehicles')</p> <p>Site conditions - traffic currently 4% of total Nitrogen deposition (KgN/ha/yr) from combined UK sources.</p> <p>47% from Livestock – road emissions is not the key source of pollution .</p> <p>No credible risk of adverse effect on site integrity in view of the site conservation objectives from increase vehicle emissions from plan policies..</p> <p>Water Quality</p> <p>No LSE will arise from water quality as the site is spring fed and at a higher altitude than the allocations.</p> <p>Recreation</p> <p><u>5</u><del>Four</del> residential allocations are located within 7km of the site with a minimum of <u>101</u> units. <u>7</u> commitment <u>sites</u> are located within 7km of the site with a minimum of <u>76</u> 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 <u>425</u>. LSE is predicted.</p> <p>Functional linked land</p> <p>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</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
		<a href="#">053/00034</a> <a href="#">131/00021</a> <a href="#">053/00009</a> <a href="#">053/00052</a>		<p>and degrade the habitat. Reducing its suitability for its designated species. LSE is predicted.</p> <p>Disturbance</p> <p>No disturbance is anticipated as the site is sufficiently distant from any allocations.</p>
St David's SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts</li> <li>4030 European dry heaths</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1831 Floating water-plantain <i>Luronium natans</i></li> </ul>	<p>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  <a href="#">S/EMP/136/00001</a></p> <p>HSG/119/LDP2/1  <a href="#">085/00022</a>  <a href="#">034/00099</a>  <a href="#">034/00292</a>  <a href="#">028/00012</a>  <a href="#">034/00165</a>  <a href="#">034/00165</a>  <a href="#">119/00028</a>  <a href="#">119/LDP/01</a>  <a href="#">119/00030</a>  <a href="#">053/00009</a>  <a href="#">053/00052</a>  <a href="#">053/00034</a>  <a href="#">000/01202</a></p>		<p>There are 5 residential allocations, <u>1</u> commitment <u>sites and 5 other allocations within 10km of the site.</u></p> <p>Atmospheric pollution  Site is not located within 200m of any roads  No credible risk if LSE</p> <p>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.</p> <p>Recreation  There are four residential allocations located within 7km of the site with a minimum of 272 units. <u>8</u> commitment sites within 7km of the site with a minimum of <u>86</u> 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 <u>859</u>. As such, LSE is predicted.</p> <p>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.</p> <p>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.</p>
Yerbeston Tops SAC	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>)</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1065 Marsh fritillary butterfly <i>Euphydryas (Eurodryas, Hypodryas) aurinia</i></li> </ul>	<p>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</p> <p><a href="#">S/EMP/096/00007</a>  <a href="#">S/EMP/096/00004</a>  <a href="#">S/EMP/096/00005</a>  <a href="#">S/EMP/096/00006</a>  <a href="#">S/EMP/096/00001</a>  <a href="#">SSA/089/01</a>  <a href="#">SSA/089/LDP2/01</a>  <a href="#">EMP/132/LDP2/01</a>  EMP/088/LDP/01  EMP/000/LDP2/01</p>		<p>There are 15 residential allocations, <u>19</u> commitment <u>sites and 14 other allocations within 10km of the site.</u></p> <p>Atmospheric pollution  Site is adjacent to minor roads,  239 units residential allocations  Contribution 4% from Road emissions  Existing air quality is just below CL.</p> <p>No credible risk that increased vehicle emissions would cause 1% threshold exceedance</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
		HSG/043/LDP2/1 HSG/095/LDP2/4 HSG/095/00144 HSG/052/LDP2/1 HSG/123/LDP/01 HSG/003/LDP2/01 <a href="#">S/EMP/096/00007</a> <a href="#">S/EMP/096/00004</a> <a href="#">S/EMP/096/00005</a> <a href="#">S/EMP/096/00006</a> <a href="#">S/EMP/096/00001</a> <a href="#">S/EMP/096/00003</a> <a href="#">EMP/093/00001</a> <a href="#">SSA/089/01</a> <a href="#">SSA/089/LDP2/01</a> <a href="#">EMP/132/LDP2/01</a>	GT/003/LDP2/01 EMP/088/LDP/01 SSA/088/LDP2/01 <a href="#">110/00015</a> <a href="#">003/00040</a> <a href="#">003/00025</a> <a href="#">015/00022</a> <a href="#">015/00024</a> <a href="#">088/00360</a> <a href="#">099/00045</a> <a href="#">088/00077</a> <a href="#">050/00043</a> <a href="#">088/00074</a> <a href="#">044/00050</a> <a href="#">025/00028</a> <a href="#">044/00015</a> <a href="#">011/00011</a> <a href="#">044/00063</a> <a href="#">012/00004</a> <a href="#">123/00045</a> <a href="#">035/00030</a> <a href="#">096/00375</a> <a href="#">096/00274</a> <a href="#">035/00021</a> <a href="#">096/00230</a>	<p>Water Quality The site is upstream of Milford Haven and allocations. As such, no LSE is predicted</p> <p>Recreation There are 7 residential allocations located within 7km of the site with a minimum of 239 units. <u>5</u> commitment <u>sites</u> within 7km of the site with a minimum of <u>76</u> 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 <u>756</u>. As such, LSE is predicted.</p> <p>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.</p> <p>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.</p>
Pembrokeshire Bat Sites and Bosherton Lakes SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara spp.</i>/Calcium rich nutrient-poor lakes, lochs</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i></li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> <li>1303 Lesser Horseshoe Bat <i>Rhinolophus hipposideros</i></li> <li>1355 Otter <i>Lutra lutra</i></li> </ul>	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/095/00144 HSG/095/LDP2/1 HSG/095/LDP2/2 HSG/095/LDP2/4 HSG/095/LDP2/5	<a href="#">S/HSG/040/LDP2/6</a> <a href="#">HSG/132/LDP2/1</a> <a href="#">S/EMP/040/00005</a> <a href="#">MXU/040/01</a> <a href="#">S/EMP/040/00001</a> <a href="#">S/EMP/086/LDP/01</a> <a href="#">SPV/066/LDP2/01</a> <a href="#">EMP/000/LDP2/01</a> <a href="#">EMP/132/LDP2/01</a> <a href="#">MXU/095/LDP2/01</a> <a href="#">EMP/093/00001</a> <a href="#">S/EMP/000/00002</a> <a href="#">S/EMP/000/00007</a> <a href="#">S/EMP/086/00003</a>	<p>There are 38 residential allocations, <u>38</u> commitment <u>sites</u> and <u>37</u> <u>other allocations within 10km of the site.</u></p> <p>Atmospheric pollution Roads within 200m Site is adjacent to minor roads, Features &amp; habitats not inherently sensitive air pollutants Additional housing is 829 units. Site conditions existing air quality is below CL</p> <p>No credible risk of impacts</p> <p>Water Quality Stackpole SSSI is the only portion of the site with water related features. The site is not hydrologically connected to any allocations.</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
		HSG/096/00238	<a href="#">S/EMP/096/00002</a>	<p>All other portions of the site are designated for horseshoe roosts, and thus are not affected by water quality.</p> <p>As such, no LSE is anticipated</p> <p>Recreation</p> <p>There are 22 residential allocations located within 7km of the site with a minimum of 838 units. 20 commitment sites located within 7km of the site with a minimum of 190 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 2467 As such, LSE is predicted.</p> <p>Functionally Linked Land</p> <p>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.</p> <p>As such, LSE predicted for bats only.</p> <p>Disturbance (Noise and Vibration)</p> <p>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.</p>
		HSG/096/LDP2/1	<a href="#">S/EMP/095/00004</a>	
		HSG/096/LDP2/2	<a href="#">S/EMP/096/00007</a>	
		HSG/099/LDP2/1	<a href="#">S/EMP/096/00004</a>	
		HSG/113/LDP2/01	<a href="#">S/EMP/096/00005</a>	
		HSG/123/LDP/01	<a href="#">S/EMP/096/00006</a>	
		HSG/086/LDP2/1	<a href="#">S/EMP/040/00014</a>	
		HSG/086/LDP2/2	<a href="#">S/EMP/040/00012</a>	
		S/HSG/086/LDP2/3	<a href="#">S/EMP/000/00004</a>	
		HSG/086/LDP2/4	<a href="#">S/EMP/040/00015</a>	
		HSG/086/LDP2/5	<a href="#">S/EMP/086/LDP2/01</a>	
		HSG/086/LDP2/6	<a href="#">EMP/040/LDP2/01</a>	
		HSG/086/00222	<a href="#">S/EMP/040/00004</a>	
		HSG/086/LDP2/7	<a href="#">S/EMP/096/00003</a>	
		HSG/043/LDP2/1	<a href="#">S/EMP/096/00001</a>	
		HSG/040/LDP2/3	<a href="#">EMP/088/LDP/01</a>	
		HSG/040/LDP2/1	<a href="#">CF/086/LDP2/1</a>	
		HSG/003/LDP2/1	<a href="#">GT/095/LDP2/1</a>	
		HSG/096/LDP2/3	<a href="#">GT/095/LDP2/2</a>	
		<a href="#">HSG/088/LDP2/1</a>	<a href="#">GT/003/LDP2/01</a>	
		<a href="#">HSG/029/00014</a>	<a href="#">GT/095/LDP2/02</a>	
		<a href="#">HSG/029/LDP2/1</a>	<a href="#">EMP/146/00001</a>	
		<a href="#">HSG/152/LDP2/1</a>	<a href="#">SSA/088/LDP2/01</a>	
		<a href="#">S/HSG/040/LDP2/6</a>	<a href="#">GT/040/LDP2/01</a>	
		<a href="#">HSG/132/LDP2/1</a>	<a href="#">015/00024</a>	
		<a href="#">S/EMP/040/00005</a>	<a href="#">015/00022</a>	
		<a href="#">MXU/040/01</a>	<a href="#">125/00009</a>	
		<a href="#">S/EMP/040/00001</a>	<a href="#">046/00015</a>	
		<a href="#">S/EMP/086/LDP/01</a>	<a href="#">095/00147</a>	
		<a href="#">SPV/066/LDP2/01</a>	<a href="#">095/00180</a>	
		<a href="#">EMP/000/LDP2/01</a>	<a href="#">025/00028</a>	
		<a href="#">EMP/132/LDP2/01</a>	<a href="#">099/00045</a>	
		<a href="#">MXU/095/LDP2/01</a>	<a href="#">096/00373</a>	
		<a href="#">EMP/093/00001</a>	<a href="#">095/00240</a>	
		<a href="#">S/EMP/000/00002</a>	<a href="#">123/00045</a>	
		<a href="#">S/EMP/000/00007</a>	<a href="#">050/00043</a>	
		<a href="#">S/EMP/086/00003</a>	<a href="#">096/00230</a>	
		<a href="#">S/EMP/096/00002</a>	<a href="#">003/00025</a>	
		<a href="#">S/EMP/095/00001</a>	<a href="#">003/00040</a>	
		<a href="#">S/EMP/096/00007</a>	<a href="#">096/00375</a>	
		<a href="#">S/EMP/096/00004</a>	<a href="#">096/00274</a>	

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
		<a href="#">S/EMP/096/00005</a> <a href="#">S/EMP/096/00006</a> <a href="#">S/EMP/040/00011</a> <a href="#">SSA/089/01</a> <a href="#">SSA/089/LDP2/01</a>	<a href="#">044/00050</a> <a href="#">011/00011</a> <a href="#">044/00015</a> <a href="#">012/00004</a> <a href="#">044/00063</a> <a href="#">110/00015</a> <a href="#">029/00013</a> <a href="#">033/00035</a> <a href="#">029/00026</a> <a href="#">088/00077</a> <a href="#">035/00030</a> <a href="#">088/00360</a> <a href="#">040/00430</a> <a href="#">035/00021</a> <a href="#">086/00282</a> <a href="#">040/00445</a> <a href="#">086/00377</a> <a href="#">088/00074</a> <a href="#">040/00077</a> <a href="#">086/00378</a> <a href="#">086/00381</a> <a href="#">040/00106</a> <a href="#">086/00129</a> <a href="#">040/00431</a> <a href="#">040/00397</a> <a href="#">086/00223</a> <a href="#">040/00373</a> <a href="#">048/00017</a>	
Skomer Skokholm and Seas off Pembrokeshire SPA	<ul style="list-style-type: none"> <li>European storm petrel <i>Hydrobates pelagicus</i> Annex I (breeding)</li> <li>Red-billed chough <i>Pyrhocorax 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</li> </ul>	<del>None</del> HSG/052/00011 HSG/052/LDP2/1 HSG/095/LDP2/5 HSG/095/LDP2/2 HSG/095/LDP2/1 HSG/095/00144 HSG/046/LDP2/1 HSG/095/LDP2/4 GT/095/LDP2/2 <a href="#">GT/095/LDP2/1</a> <a href="#">S/EMP/095/00001</a>		<p>There are 13 residential allocations, 13 commitment <a href="#">sites and 16 other allocations within 10km of the site.</a></p> <p>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</p> <p>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.</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds	Impacts
	<p>(breeding)</p> <ul style="list-style-type: none"> <li>Seabird assemblage – seabird assemblage of importance – at least 20,000 seabirds in any season the main components are razorbill <i>Alca torda</i>, common guillemot <i>Uria aalge</i>, black-legged kittiwake <i>Rissa tridactyla</i>, Atlantic puffin, lesser black-backed gull, Manx shearwater and European storm petrel</li> </ul>	<p><a href="#">S/EMP/096/00005</a>  <a href="#">S/EMP/096/00004</a>  <a href="#">S/EMP/096/00006</a>  <a href="#">S/EMP/000/00007</a>  <a href="#">S/EMP/000/00003</a>  <a href="#">S/EMP/096/00002</a>  <a href="#">S/EMP/096/00001</a>  <a href="#">S/EMP/096/00003</a>  <a href="#">S/EMP/096/00007</a>  <a href="#">S/EMP/000/00004</a>  <a href="#">S/EMP/086/LDP/01</a>  MXU/095/LDP2/01  S/EMP/000/00002  HSG/096/LDP2/3  <a href="#">125/00009</a>  <a href="#">095/00240</a>  <a href="#">046/00015</a>  <a href="#">095/00147</a>  <a href="#">095/00180</a></p>	<p>Recreation.  There are 8 residential allocations located within 7km of the site with a minimum of 3944 units. 5 commitment sites located within 7km of the site with a minimum of 89 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 1159. As such, LSE is predicted.</p> <p>Functionally Linked Land  There are no allocations that will result in a direct habitat loss or degradation of the site.</p> <p>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.</p>
Grassholm SPA	<ul style="list-style-type: none"> <li>Gannet <i>Morus bassanus</i></li> </ul>	None	No allocations or commitments are located within 10km of the site. As such, no LSE is anticipated.
Ramsey and St. David Peninsula Coast SPA	<ul style="list-style-type: none"> <li>Red-billed chough <i>Pyrhocorax pyrrhocorax</i> Annex I (breeding)</li> </ul>	<p><a href="#">HSG/119/LDP2/1</a><a href="#">HSG/049/LDP2/1</a>  <a href="#">HSG/114/LDP/01</a>  <a href="#">HSG/049/LDP2/1</a>  <a href="#">HSG/119/LDP2/1</a>  <a href="#">000/01202</a>  <a href="#">119/LDP/01</a>  <a href="#">119/00030</a>  <a href="#">119/00028</a>  <a href="#">HSG/114/LDP/01</a>  <a href="#">085/00022</a>  <a href="#">028/00012</a></p>	<p><a href="#">There 3 residential allocations, 6 commitment sites and no allocations within 10km of the site.</a></p> <p>Atmospheric pollution  Site is not located within 200m of any roads.  No credible risk of LSE is anticipated.</p> <p>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.</p> <p>Recreation  There are 3 residential allocations located within 7km of the site with a minimum of 97 units. 4 commitment sites allocations located within 7km of the site with a minimum of 48 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 348. As such, LSE is predicted.</p> <p>Functionally Linked Land  There are no allocations that will result in a direct habitat loss or degradation of the site.</p> <p>Disturbance (Noise and Vibration)</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
Carmarthen Bay SPA.	<ul style="list-style-type: none"> <li>Common Scoter <i>Melanitta nigra</i> (wintering)</li> </ul>	GT/003/LDP2/01 SSA/089/01 SSA/089/LDP2/01 EMP/132/LDP2/01 EMP/000/LDP2/01 EMP/088/LDP/01 EMP/088/LDP/01 HSG/132/LDP2/1 HSG/047/LDP2/1 HSG/050/LDP2/1 HSG/099/LDP2/1 HSG/123/LDP/01 HSG/003/LDP2/1 <a href="#">HSG/088/LDP2/1050/00043</a> <a href="#">099/00045</a> <a href="#">003/00040</a> <a href="#">003/00025</a> <a href="#">110/00015</a> <a href="#">123/00045</a> <a href="#">088/00077</a> <a href="#">015/00022</a> <a href="#">015/00024</a> <a href="#">088/00360</a> <a href="#">088/00074</a>		<p>The site is sufficiently distanced from the nearest proposed allocation such that there will be no disturbance via noise or vibration.</p> <p>There are 7 residential allocations, <u>8</u> commitment <u>sites and 5 other allocations within 10km of the site.</u></p> <p>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</p> <p>Water Quality            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 water in the tributaries entering Carmarthen Bay. As such, LSE is predicted.</p> <p>Recreation            There are six residential allocations located within 7km of the site with a minimum of 118 units. <u>5</u> commitment <u>sites</u> located within 7km of the site with a minimum of <u>66</u> 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 <u>442</u>. As such, LSE is predicted.</p> <p>Habitat Loss            As the site features are marine, no LSE is predicted.</p> <p>Disturbance (Noise and Visual)            As the sites are marine and the allocations within 10km are terrestrial based, no LSE is predicted.</p>
Castlemartin coast SPA	<ul style="list-style-type: none"> <li>Red-billed chough <i>Pyrhocorax pyrrhocorax</i> Annex I (breeding)</li> </ul>	HSG/086/LDP2/1 HSG/096/LDP2/1 HSG/095/00144 HSG/095/LDP2/1 HSG/046/LDP2/1 HSG/096/LDP2/2 HSG/086/LDP2/2 S/HSG/086/LDP2/3 HSG/086/LDP2/4 HSG/086/LDP2/5 HSG/066/LDP2/1	<a href="#">HSG/095/LDP2/4</a> <a href="#">HSG/095/LDP2/5</a> <a href="#">HSG/052/LDP2/4</a> <a href="#">HSG/096/00238</a> <a href="#">HSG/086/00222</a> <a href="#">HSG/052/00011</a> HSG/048/00038 SPV/066/LDP2/01 MXU/095/LDP2/01 EMP/093/00001 S/EMP/000/00002	<p>There are 23 residential allocations, <u>16</u> commitment <u>sites -and 23 other allocations within 10km of the site.</u></p> <p>Atmospheric Pollution            Within 200m of road            Site is adjacent to minor roads,            Site features – Red-billed chough – habitats not inherently sensitive to air pollutants.            Existing air quality is below CL.            No credible risk of LSE</p> <p>Water Quality            The site is not hydrologically connected to any allocations. As such, no LSE is</p>

Designated Site	Designated Features	Allocations & Commitments within 10km thresholds		Impacts
		HSG/095/LDP2/2 HSG/086/LDP2/6 HSG/135/LDP2/1 HSG/086/LDP2/7 HSG/093/00066 S/EMP/000/00007 CF/052/LDP2/01 S/EMP/000/00003 S/EMP/086/00003 S/EMP/096/00002 S/EMP/096/00007 S/EMP/096/00006 S/EMP/000/00004 S/EMP/096/00003 S/EMP/086/LDP2/01 CF/086/LDP2/1 HSG/095/LDP2/4 HSG/095/LDP2/5 HSG/052/LDP2/1 HSG/096/00238 HSG/086/00222 HSG/052/00011	S/EMP/086/LDP/02 S/EMP/095/00001 S/EMP/096/00004 S/EMP/096/00005 S/EMP/086/LDP2/01 S/EMP/096/00001 GT/095/LDP2/1 GT/095/LDP2/2 <a href="#">GT/095/LDP2/2</a> <a href="#">GT/095/LDP2/1</a> <a href="#">SSA/135/LDP2/01</a> S/EMP/086/LDP/01 EMP/146/00001 HSG/096/LDP2/3 <a href="#">125/00009</a> <a href="#">086/00377</a> <a href="#">086/00381</a> <a href="#">086/00378</a> <a href="#">095/00240</a> <a href="#">046/00015</a> <a href="#">086/00282</a> <a href="#">095/00147</a> <a href="#">095/00180</a> <a href="#">086/00223</a> <a href="#">012/00004</a> <a href="#">025/00028</a> <a href="#">096/00230</a> <a href="#">096/00375</a> <a href="#">086/00129</a> <a href="#">011/00011</a> <a href="#">096/00373</a> <a href="#">096/00274</a>	<p>predicted.</p> <p>Recreation</p> <p>There are <u>17</u>- residential allocations located within 7km of the site with a minimum of <u>844</u> - units. <u>9</u> commitment <u>sites</u> located within 7km of the site with a minimum of <u>167</u> 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 <u>2426</u>. As such, LSE is predicted.</p> <p>Habitat Loss</p> <p>As the chough is highly mobile, with males capable of dispersing approximately 40km (Future Wales), and finding suitable habitat. As such, LSE is not predicted.</p> <p>Disturbance (Noise and Visual)</p> <p>There are no allocations inside the site boundary. As such, no LSE is predicted.</p>

