



Pembrokeshire County Council
Local Development Plan 2
2017-2033

Deposit 2 Plan HRA

September 2024

Foreword

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

Ricardo supplied a draft HRA to Pembrokeshire County Council on 20th March 2024. That document forms the basis for this subsequent version of the HRA document, dated 1st 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 20th 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 20th 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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EXECUTIVE SUMMARY

- A. The LDP2 sets out the strategy and policy framework for the development and conservation needs of Pembrokeshire (excluding the area of National Park designation) for the period, from 2017 to 2033. The objective of this assessment is to identify any aspects of the Plan that might cause an 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, either in alone or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- B. The initial Stage 1 screening identified that 21 European sites are located within 10km of the Local Development Plan Area. The European Sites are as follows:

Bristol Channel Approaches SAC	Preseli SAC
St David’s SAC	Gweunydd Blaencleddau SAC
Ramsey and St David 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 Stokholm and Seas of Pembrokeshire SPA	

- C. Out of the 21 European Sites within the 10km Zone of Influence, two European sites, Grassholm SPA and Skomer Stokholm and Seas off Pembrokeshire SPA, were screened out as no allocations are planned within 10km of either site. The 19 remaining European sites were screened in.
- D. The initial policy screening (HRA Stage 1) found:
- The Plan’s introductory chapters, vision and objectives can be screened out.
 - 11 out of the 21 Strategic Policies will lead to LSE.
 - 24 General Policies will lead to LSE.
 - Allocations: All allocations except for two transport improvement schemes have been screened in as they will lead to LSE to European sites without mitigation.
 - Appendices to the Plan: The appendices can be screen out.

- E. Policies and allocations that would lead to LSE to European sites without mitigation have been progressed to Stage 2 Appropriate Assessment.
- F. All European sites excluding Grassholm SPA and Skomer Stokholm and Seas SPA will be impacted by LSE resulting from policies and allocations (Table 1.2).

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

Impact Pathway	Affected Designated Site	Screened in for AA
Atmospheric Pollution	Afonydd Cleddau SAC Pembrokeshire Marine SAC	Yes
	Carmarthen Bay Dunes SAC	No - lack of likely commuting routes associated with allocations
Water Quality	Afonydd Cleddau SAC (Nutrient Neutrality) Pembrokeshire Marine SAC Carmarthen Bay SAC Carmarthen Bay SPA. Cardigan Bay SAC Afon Teifi SAC Gweunydd Blaencleddau SAC North Pembrokeshire Woodlands SAC	Yes
Recreation	All sites excluding : Grassholm SPA, Skomer Stokholm and Seas off Pembrokeshire 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

- G. The **Stage 2** Appropriate Assessment identified that the current mitigation implemented within LDP2 is insufficient and could lead to adverse effects to European site Conservation Objectives. This mitigation is 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 non-nutrient related water quality, disturbance, and loss of functionally linked land unless the current mitigation is strengthened to specifically address LSE at the project level.

H. Additional mitigation is required to fully mitigate LSE resulting from the following Policies and all allocations except for two transport improvement schemes:

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

General Policy	
	GN 5 Renewable Energy - Part 2 Allocations
1.	GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)
2.	GN 7 Cawdor Barracks including the former Brawdy Airfield
3.	GN 8 Employment Proposals
	GN 9 Employment Allocations
4.	GN 10 Mixed-use Housing and Employment Proposals Part 1 Policy and Part 2 Allocations
5.	GN 11 Protection of Employment Sites and Buildings
6.	GN 12 Extensions to Employment Sites
7.	GN 13 Residential Development
	GN 16 Residential Allocations
	GN 18 Slade Lane, Haverfordwest
	GN 19a Maesgwynne, Fishguard
	GN 19b South of Conway Drive, Castle Pill Road, Steynton –
8.	GN 21 Exception Sites for Local Needs Affordable Housing
9.	GN 22 Specialist and Supported Accommodation
	GN 23 Specialist and Supported Accommodation Allocations
	GN 24 Gypsy and Traveller Site Allocations
10.	GN 25 Gypsy and Traveller Sites and Pitches
11.	GN 28 Protection and Enhancement of the Historic Environment
12.	GN 29 Community Facilities
	GN 30 Community Facility Allocations
13.	GN 31 Retail and Commercial Centre Development
14.	GN 32 Out-of-Centre Retail and Commercial Development
15.	GN 33 Farm Diversification
16.	GN 34 Conversion or Change of Use of Agricultural Buildings

General Policy	
17	GN 35 Marinas
	GN 36 Transport Routes and Improvements – 2 safeguarded sites TS/LDP2/03 Road & Footpath Well Hill improvement, Pembroke Well Hill – Pembroke & TS/LDP2/08 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Bus Station This policy has two elements.
	GN 37 – Working of Minerals –allocation - MN/000/LDP2/001 Trefigin Quarry extension
18	GN 54 Visitor Attractions and Leisure Facilities
19	GN 55 Serviced and Hotel Accommodation
20	GN 56 Caravan, Camping and Chalet Development
21	GN 57 Site Facilities on Existing Caravan and Camping Sites
22	GN 58 Self-Catering Accommodation
23	GN 59 Waste Management Facilities Part 1 Policy and Part 2 Allocations
24	GN 60 Disposal of Waste on Land

- I. To mitigate the above policies, the wording of SP 12 *Maintaining and Enhancing the Environment* and Policy GN 41 *Protection of National Statutory Environmental Designations* is proposed for amendment.
- J. In respect to recreational impacts, existing mitigation provided by the Pembrokeshire Coast National Park Authority and partners through recreation management initiatives, is sufficient to mitigate impacts resulting from increased recreational use of European sites. As such, no adverse effect to the integrity of the Site will occur in regard to marine and terrestrial recreation.
- K. Nutrient related water quality impacts within the Afonydd Cleddau SAC and Afon Teifi SAC were found to lead to adverse effects on the aforementioned European sites. To mitigate the increase in phosphates to the Cleddau catchment, it was initially thought that all developments that may result in an increase in nutrients to the aforementioned catchments would have to demonstrate that they are nutrient neutral to satisfy the requirements of the Habitat Regulations. However, following review of Environmental Permits for WwTWs in the affected catchments, the Council is now required to consult with the water company, Dwr Cymru Welsh Water, to establish whether future developments proposed by the Plan can take place within the newly imposed limits, rather than to demonstrate nutrient neutrality. PCC has done this and the outcome has been that such capacity has been found to be available at all the WwTWs in the affected riverine catchments where new allocations (particularly for residential development) are proposed. NRW will then monitor operational compliance of the water company at the WwTWs, to ensure that the new permit limits are being adhered to. Nonetheless, the protection of river water quality remains an important matter and this is reflected in the wording of LDP 2 policy GN 47 Water Quality and Protection of Water Resources. In some instances project level HRA may still be needed in conjunction with development proposals on allocated sites (particularly those for residential development) reflecting the need to also consider

surface water disposal aspects and CSOs). By applying this current mitigation, no adverse effect will occur to the Afonydd Cleddau SAC.

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

¹ Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in combination.

1. Introduction

The overall Plan

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

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

Legislation Summary

5. Under the Conservation of Habitats and Species Regulations 2017 (as amended)³, (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 in view of the site’s conservation objectives.
6. Habitats Regulations Assessment (HRA) refers to the assessment of the potential effects of a development project on one or more European sites, including SPAs and SACs. The Government also expects potential SPAs (pSPAs), candidate SACs (cSACs), and any confirmed HRA compensatory habitat to be considered in the same way.
 - **Special Areas of Conservation (SACs)** are designated under the Habitats Directive (92/43/EEC) and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance.
 - **Special Protection Areas (SPAs)** are classified under the European Council Directive ‘on the conservation of wild birds’ (2009/147/EC) (the ‘Wild Birds Directive’) for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Directive, and migratory species).
7. The UK Government has also advised that Ramsar sites should be considered and included within the assessment⁴:
 - **Ramsar sites** support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
8. For ease of reference during HRA, these three designations are collectively referred to as ‘European sites’, despite Ramsar designations being at the wider international level, and are also known as ‘Habitat Sites’.

Potentially Affected Habitat Sites

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

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

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

⁴ Department for Communities and Local Government (2012) National Planning Policy Framework.

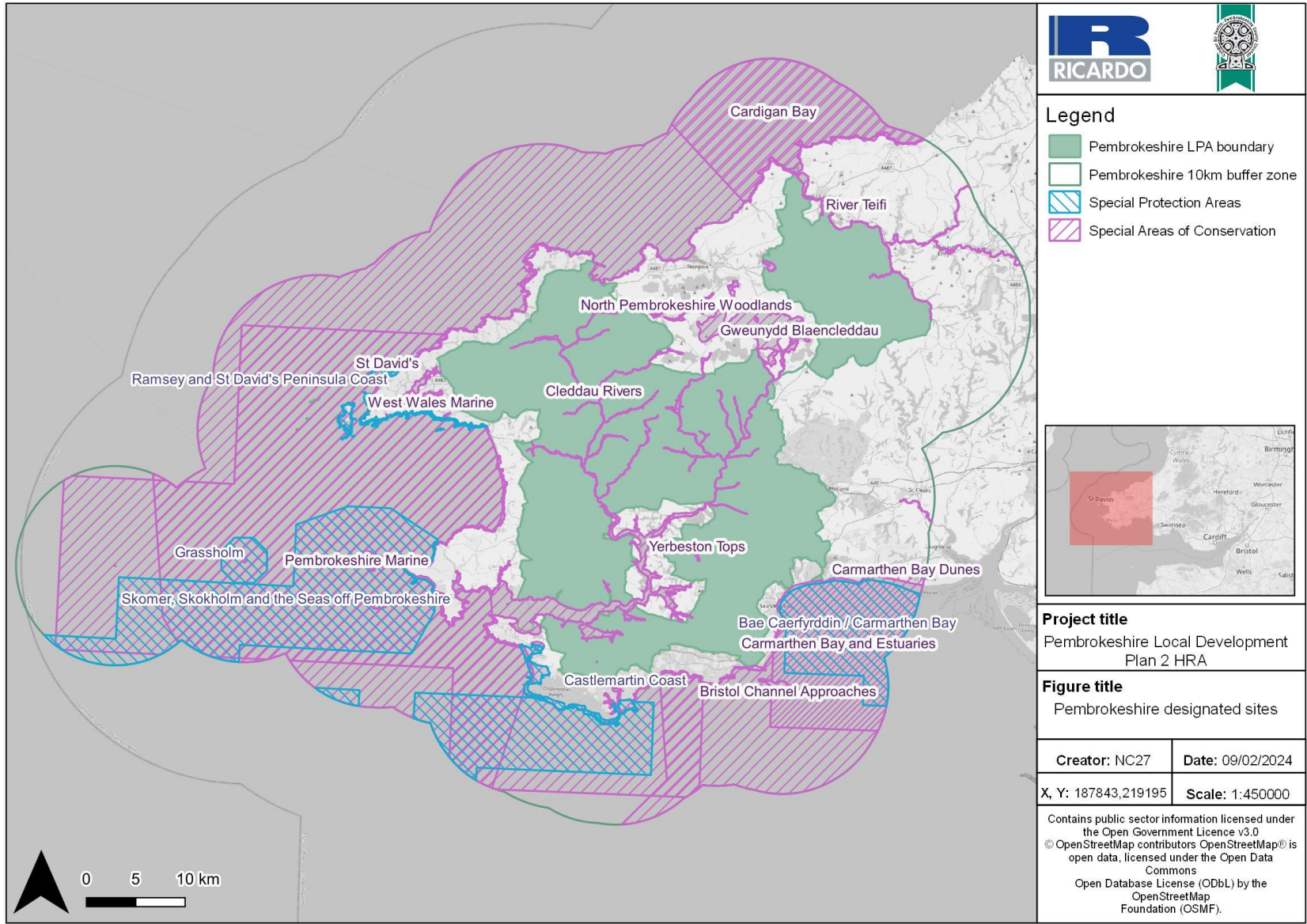
Appendix D

<ul style="list-style-type: none">• Carmarthen Bay SPA	<ul style="list-style-type: none">• Carmarthen Bay SAC
<ul style="list-style-type: none">• West Wales Marine SAC	<ul style="list-style-type: none">• Limestone Coast SAC
<ul style="list-style-type: none">• Yerboston Tops SAC	<ul style="list-style-type: none">• Carmarthen Bay Dunes SAC
<ul style="list-style-type: none">• Castlemartin Coast SPA	<ul style="list-style-type: none">• Pembrokeshire Marine SAC
<ul style="list-style-type: none">• Pembrokeshire Bat Sites and Bosherton Lakes SAC	<ul style="list-style-type: none">• Afonydd Cleddau SAC
<ul style="list-style-type: none">• North Pembrokeshire Woodlands SAC	<ul style="list-style-type: none">• Northwest Pembrokeshire Commons SAC
<ul style="list-style-type: none">• Skomer Stokholm and Seas SPA	

Purpose of this report

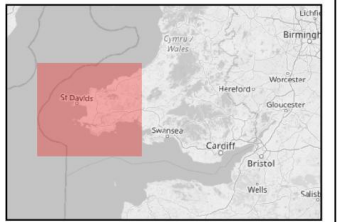
10. The purpose of this report is to provide the necessary information to allow the Competent Authority (in this case Pembrokeshire County Council) to determine if the proposals policies and allocations within this Plan result in adverse effect on the integrity of the site(s) identified in **Section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

Figure 1.1 Local Development Plan Area and relevant European sites



Legend

- Pembrokeshire LPA boundary
- Pembrokeshire 10km buffer zone
- Special Protection Areas
- Special Areas of Conservation



Project title
Pembrokeshire Local Development Plan 2 HRA

Figure title
Pembrokeshire designated sites

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2. METHODOLOGY

Guidance

11. The approach to informing the Screening and Appropriate Assessment has been developed from the legislation described in Section 1.2 above and informed by the latest guidance for HRA in the UK, namely:

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

Context and stages of the HRA process

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

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

Stage 1 Screening – the identification of Likely Significant Effects (LSEs) of a plan or project on a European designated site either alone or in-combination. The test is a trigger for further assessment, and therefore the bar is set low i.e., is there a

⁵ Also referred to as the 'test of significance'.

⁶ Also referred to as the 'integrity test'.

risk or possibility of an adverse effect. At this stage mitigation measures should not be taken into account, in accordance with the People over Wind (Court of Justice of the European Union (ECJ) Case C-323/17); this reinforces the idea of screening as a 'low bar' and makes 'appropriate assessments' more common.

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

Stage 3 – Alternative Solutions – where adverse effects or uncertainty remain after the inclusion of mitigation in Stage 2, alternative ways where alternative solutions that meet the plan objectives are identified and consideration of their effects are given in comparison to those in the plan. A plan or project which has adverse effects on the integrity of a European site cannot be permitted if alternative solutions are available, except where the criteria for imperative reasons of overriding public interest are met (IROPI, see Stage 4).

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

Approach to HRA Stage 1 Screening

14. The 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).
 - 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 designated⁷, 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.

⁷ Annexes are contained within the relevant EC Directive.

15. 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

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

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

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

Category	Description	Screening Outcome
L	Policy or proposal likely to have a significant effect in combination	Screen in after in-combination test
M	Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site	Screened in

17. 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

18. 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).

19. 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' case⁸ 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

20. 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

⁸ Boggis and Another v Natural England: Court of Appeal, 20 Oct 2009

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

21. The following sources of published information were used:

- Site citations.
- Site Register Entries.
- Conservation Objectives and Supplementary Advice on Conservation Objectives (for SPAs/SACs⁹).
- Site Improvement Plans (SIPs).
- Core Management Plans (SACs and SPAs)
- Regulation 33 information for European Marine Sites or Conservation Advice for Marine Protected Areas¹⁰.
- 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

22. The DTA HRA Handbook¹¹ provides guidance on **Table 2.2**, however the best and latest information should always be used to inform an assessment. Where possible, robust universal assumptions regarding the sensitivities of European site interest features will also be specified and applied at screening, for example:

- wide-ranging marine / marine dependent species associated with marine sites that are not directly connected to the hydrological zone of influence are not typically considered to be both sensitive and exposed to the effects of the options (except in certain relatively unique circumstances, such as some desalination schemes).

⁹ 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.

¹⁰ 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)¹⁰

¹¹ Tyldesley, D. & Chapman, C. (2021). The Habitats Regulations Assessment Handbook [online]. DTA Publications Limited.

23. 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-combination’ effects). Impact specific zones of influence include:

- Recreation: 7km
- Air Quality: 200m from nearest main road ([Advisory Note: Ecological Assessment of Air Quality Impacts | CIEEM](#))
- Nutrient inputs from increased populations: catchment specific

Table 2.2 Potential Impacts of Plans and Policies

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

Broad categories of potential impacts on European Sites, with examples	Examples of activities responsible for impacts <i>(example distance considerations in italics)</i>
	Risk of accidental mortality of species.
Disturbance	Species disturbance via personnel, machinery, noise, and vibration.

Air Quality

24. The Screening criteria is based on DTA methodology, and a review of approaches undertaken by other local authorities in their emerging LDPs.

- Sites more than 200m of any roads are screened out of the assessment.
- Site with features not affected by pollutants are screened out of the assessment.
- Sites adjacent to minor roads, not near to any allocations and where existing air quality is below Critical Load (CL) are screened out of the assessment. This is because any change in air quality are likely to be small scale and not generate emissions that exceed the 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 screened out of the assessment.
- 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 where CLs are not available 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

25. 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.
26. 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.
27. 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

28. Consultation, via meetings and correspondence, has been undertaken with Natural Resource Wales (NRW) during the first iteration of the HRA in 2018 and again during the deposit stage in 2020. Additionally, there has been discussion with Pembrokeshire County Council during the screening stage of this HRA (HRA Stage 1).

Impact assessment

29. This assessment considers the potentially damaging aspects of the policy or allocation with potential effects on a European site's qualifying features and likely achievement of the conservation objectives.
30. 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.

31. 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.
32. 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.
33. 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

34. 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

35. 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.

36. 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.

37. 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

38. Where the Plan has been assessed as having a significant adverse effect by undermining the site's conservation objectives, additional 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

39. The integrity test is the conclusion of the Appropriate Assessment and 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. 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”

40. 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

41. 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.

42. 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.

43. 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.

44. 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.

45. 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:

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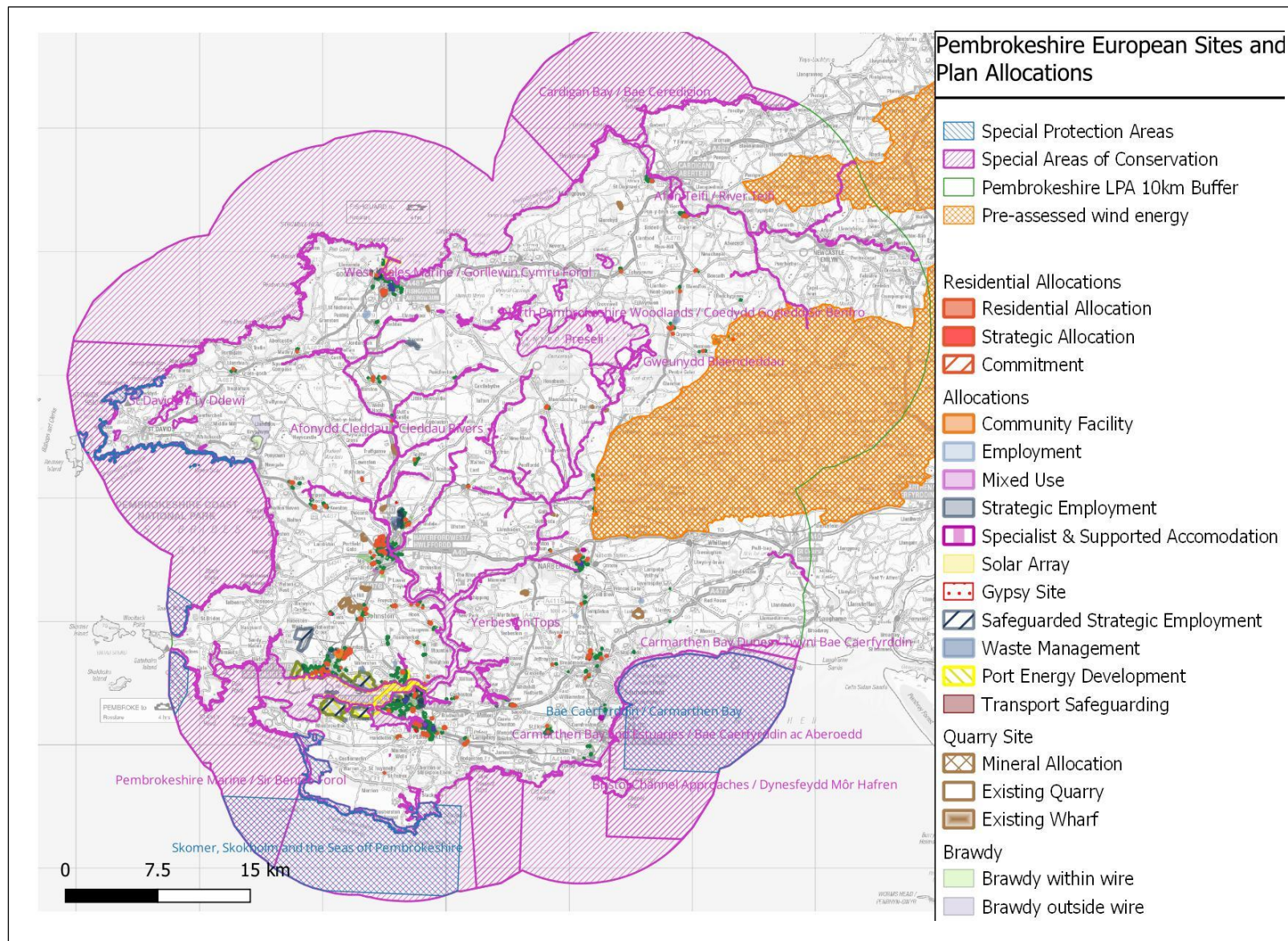
- Areas of search for sand and gravel.
- Quarry/mineral site extensions.
- Major minerals proposals.
- Major waste proposals, including landfill site extension, waste sites.
- Others as identified during the process.

3. HRA Stage 1 Screening

Identification of Likely Significant Effects

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

Figure 3.1 Local Development Plan Area and relevant European sites



HRA Stage 1 Screening

47. Using the methodology outlined in Section 2 the introductory sections, vision, objectives, policies and allocations were screened to determine if LSE will occur to any European site. The initial screening found that:

- The Plan's **introductory chapters, vision and objectives** can be screened out as seen in **Table 3.1a**.
- 11 out of the **21 Strategic Policies** will lead to LSE as seen in the summary **Table 3.1b**
- **24 General Policies** (excluding those that allocated land for development) will lead to LSE as seen in **Table 3.1c**.
- **Allocations:** All allocations except for two transport improvement schemes have been screened in as they are likely to LSE to European sites without mitigation – see **Table 3.1b** in part and **Table 3.1c** below.
- **Appendices to the Plan:** - See commentary below under Table 3.1d. The appendices can be screen out.

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

49. All European sites excluding Grassholm SPA and Skomer Stokholm and Seas SPA will be impacted by LSE resulting from policies and allocations. The screening of the European sites can be found in **Table 3.2**. The initial screening of European sites can be found in **Appendix B**.

50. Screening of allocations in relation to recreational impacts can be found in **Appendix C and D**.

Introductory Chapters, Vision and Objectives

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

Element of plan	Assessment and rationale	Category	Screening conclusion
<i>Introductory Section and Chapter 1 Context and Key Issues</i>	Administrative text, Background and Context	A	Screened out
<i>Vision</i>	General aspirations for the Plan area	A	Screened out
<i>LDP Objectives A-K</i>			
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	General statement, however there may be potential effects – implications	A	Screened out

Element of plan	Assessment and rationale	Category	Screening conclusion
cultural and built heritage, landscape and townscape.	assessed under subsequent policies		
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
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 ¹² 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 under subsequent policies	A	Screened out

¹² Note that infrastructure includes mobile and broadband provision, transport improvements and sewerage capacity.

Strategic Policies

Table 3.1b Screening of LPD2 Strategic Policies.

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

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	Policy	Screening Category	Screening Outcome
			will be permitted. Over 5 dwellings will not be supported. Specifically, Phosphate related AA required.
11.	SP11: Countryside	I	Screened in – limited development will be permitted. As a precautionary principle however, although not spatially specific increased population increase generated nutrient waste leading to LSE in affected catchments. Additionally, increased population will result in an increase in recreational pressure.
12.	SP12: Maintaining and Enhancing the Environment	D	Screened Out: General plan wide environmental protection policy.
13.	SP13: Port and energy-related Development and Celtic Freepart	B/H	Screened Out: 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, 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.
14.	SP14: Strategic Employment Provision	H/I	Screened Out: Project level HRA required for sites impacting Pembrokeshire marine SAC. 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. Reference is made in paragraph 4.90 to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC.
	S/EMP/086/LDP/01 Blackbridge	I	Screened in for: West Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	S/EMP/136/00001 Former RNAD Site, Trecwn	I	Screened in for: Afonydd Cleddau SAC; N. Pembs Woodlands SAC; Preseli SAC; W Wales Marine SAC
	S/EMP/034/00003 Goodwick	I	Screened in for: Afonydd Cleddau SAC; West Wales Marine SAC; N Pembs Woodlands SAC; St Davids SAC
	S/EMP/040/00004 Witybush Cluster (Trading Estate)	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	S/EMP/040/00005 Witybush Cluster (North of East Estate)	I	Screened in for: Afonydd Cleddau SAC; Pembs Bat Sites and Bosh Lakes SAC
	S/EMP/040/00001 Witybush Cluster (West Estate)	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	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

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	Policy	Screening Category	Screening Outcome
	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
15.	SP15: Safeguarding of Existing Employment Sites	IH	Screened out - This policy identifies existing employment sites which are safeguarded under specific use classes. These safeguarded sites include parts of sites that have not been developed. However, the policy's reasoned justification (4.96) explicitly refers to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC.
	S/EMP/000/00002 Pembroke Oil Refinery (Valero)	I	Screened in for: Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC; W Wales Marine SAC
	S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)	I	Screened in for: Afonydd Cleddau SAC
	S/EMP/000/00004 Waterston Tank Farm and LNG, Milford Haven	I	Screened in for: W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	S/EMP/000/00007 South Hook LNG (part)	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Castlemartin Coast SPA; Afonydd Cleddau SAC
	S/EMP/095/00001 Pembroke Power Station	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Pemb Bat Sites and Bosh Lakes SAC; Castlemartin Coast 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 Davids 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
	S/EMP/086/0000 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

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	Policy	Screening Category	Screening Outcome
	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; Castlemartin SPA
	S/EMP/096/0000 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
	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; Yerbstone Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin 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; Castlemartin SPA
	S/EMP/096/00006 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Waterloo & London Road Industrial Estate)	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin SPA
	S/EMP/096/00007 S/EMP/096/C3 Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)	I	Screened in for: Pembs Marine SAC; Limestone Coast SAC; Yerbstone Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast 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 their detail and location may have a likely significant effect on European sites Safeguarded routes which are referred to in Policy GN 36 are considered separately.
21.	SP 21 Waste Prevention and Management	F	Screened out: This policy is a high-level policy setting out land use priorities which will be used with reference to later policies in

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	Policy	Screening Category	Screening Outcome
			the Plan as well as national planning policies. The policy in itself cannot lead to development.

General Policies

Table 3.1c 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	B	Screened out: policy listing general criteria for testing the acceptability / sustainability of proposals.
3.	GN 3 Infrastructure and New Development	B	Screened out: this is a policy listing general criteria for testing acceptability defining requirements for proposals.
4.	GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	B / I	Screened out: This is a policy listing the general criteria for testing acceptability of renewable energy proposals. It is not spatially specific but could theoretically be relevant to schemes which might impact upon European sites. However, the policy explicitly refers to <i>'Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported.'</i> It is therefore considered that Policy GN 41 will provide sufficient protection to avoid schemes coming forward which represent a risk to European sites. In view of policy GN 41, policy GN 4 cannot undermine the conservation objectives of any European sites
5.	GN 5 Renewable Energy – target and allocations The policy consists of 2 parts: <ul style="list-style-type: none"> ▪ Part 1: sets out the target per annum for renewable energy generation. ▪ Part 2: allocates two sites for solar arrays. 	A	For Part 1 Screened out: general statement of policy which does not define spatial distribution. Potential effects on European sites cannot be identified as the policy is too general. For Part 2 This policy identifies solar panel array allocations which are considered in further detail below.
	SPV/066/LDP2/01 East of Hazelbank, Llanstadwell	I	Screened in for: 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

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	Policy	Category (criteria A-M)	Screening conclusion
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 ¹³ Appendix B, Table B outlines the potential impacts associated with each Pre-Assessed Area. The table also includes a list of avoidance/mitigation measures (from Table 6 of the same Assessment) which must be considered when future proposals come forward for DNS projects. However, Local planning authorities must also ensure that through lower-tier plans no adverse effects occur on the integrity of SACs and SPAs sites with renewable energy proposals that fall below the threshold for DNS applications. Further assessment of this policy is required.
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; Gweunydd Blaencleddau SAC; Preseli SAC
	EMP/034/00006 Celtic Link Business Park, near Scleddau	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St Davids 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
	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 Davids 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; Yerboston Tops SAC; Pembs

¹³ <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040-habitats-regulations-assessment.pdf>

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	Policy	Category (criteria A-M)	Screening conclusion
			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; Castlemartin Coast SPA
9.	<p>GN 10 Mixed-use Housing and Employment Proposals</p> <p>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	<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 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
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.

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	Policy	Category (criteria A-M)	Screening conclusion
12	GN 13 Residential Development	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites. Many existing employment sites lie adjacent to designated sites.
13	GN 14 Replacement Dwellings in the Countryside	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.
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 Bat Sites and Bosh Lakes SAC
	HSG/040/LDP2/3 Rear of 76 Pembroke Road Merlins Bridge	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC
	HSG/086/00222 South West of The Meads Milford Haven	I	Screened in for: 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/LDP2/1 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

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Policy	Category (criteria A-M)	Screening conclusion
HSG/086/LDP2/4 Former Hakin Infants' School Milford Haven	I	Screened in for: W Wales Marine SAC; Limestone Coast SAC; Pembs Marine SAC; Castlemartin Coast SPA
HSG/086/LDP2/5 Former Hubberston VC School, Hakin 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/LDP2/6 Former Hakin Junior School 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/LDP2/7 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 Conway Drive, 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/095/00144 North of Gibbas Way Pembroke	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
HSG/095/LDP2/1 Between St Daniels Hill & Norgans Hill Pembroke	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast 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; Castlemartin Coast SPA
HSG/095/LDP2/4 East of Golden Hill Road Pembroke	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
HSG/095/LDP2/5 South East of Southlands St.Daniels Hill Pembroke	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
HSG/096/00238 North of Pembroke Road Pembroke Dock	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

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Policy	Category (criteria A-M)	Screening conclusion
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
HSG/096/LDP2/2 West of Stranraer Road Pembroke Dock	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast 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 Davids 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
HSG/020/LDP2/1 Land at Tan Ffynnon Fields Cilgerran	I	Screened in for: Cardigan Bay SAC; N Pembs Woodlands SAC; Afon Teifi SAC; Preseli 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: 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; Carms Bay 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; Carms

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Policy	Category (criteria A-M)	Screening conclusion
		Bay SPA; Limestone Coast SAC; Yerbeston Tops SAC
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 Davids SAC
HSG/063/00024 North of The Kilns Llangwm	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC
HSG/122/00035 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/LDP2/01 North of Begelly Farm Begelly	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Carmarthen Bay SAC; Limestone Coast SAC; Yerbeston Tops SAC
HSG/006/00003 Adjacent to Hafod Blaenffos	I	Screened in for: Afon Teifi SAC; Gweunydd Blaencleddau SAC; N Pembs Woodlands SAC; Preseli SAC
HSG/022/LDP2/1 Land at Dungleddy Court Clarboston Road	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Preseli SAC;
HSG/152/LDP2/1 South of Bro'r Dderwen Clunderwen	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC
HSG/029/00014 Opposite Woodholm Close Crundale	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC
HSG/029/LDP2/1 West of Ashford Park Crundale	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC
HSG/043/LDP2/1 Adjacent to Brackenhurst Hill Mountain	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC
HSG/046/LDP2/1 Land at West End Cottages Hundleton	I	Screened in for: Bristol Channel SAC; W Wales Marine SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Limestone Coast SAC; Castlemartin Coast SPA
HSG/047/LDP2/1 South of The Crown Jeffreyston	I	Screened in for: Afonydd Cleddau SAC; Bristol Channel SAC; Carms Bay SAC; Pembs Marine SAC; Yerbeston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay SPA

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Policy	Category (criteria A-M)	Screening conclusion
HSG/049/LDP2/1 East of Brookfield Close and West of Bridge Lane Keeston	I	Screened in for: Afonydd Cleddau SAC; Pembs Marine SAC; Preseli SAC;
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; 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
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; W Wales Marine SAC; Pembs Marine SAC
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 Davids SAC; Ramsey and St Davids Pen Coast SPA
HSG/120/00018NW 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; Yerboston Tops SAC; Pembs Bat Sites and Bosh Lakes SAC; Carms Bay 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:

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	Policy	Category (criteria A-M)	Screening conclusion
			Afonydd Cleddau SAC; North Pembrokeshire Woodland SAC; Preseli SAC
15	GN 17 Residential Commitments	-	Screened out: There is no requirement to effectively reassess commitments 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 ¹⁴ , in addition to advice published by NRW specifically concerning those situated within SAC P Sensitive Catchments ¹⁵ .
	GN 18 Slade Lane, Haverfordwest	I	This policy identifies a residential allocation which is screened under GN 16 Allocations.
	GN 19a Maesgwynne, Fishguard	I	This policy identifies a residential allocation which is screened under GN 16 Allocations
	GN 19b South of Conway Drive, Castle Pill Road, Steynton –	I	This policy identifies a residential allocation which is screened under GN 16 Allocations
	GN 20 – Local Needs Affordable Housing	B	Screened out: policy listing general criteria.
16	GN 21 – Exception Sites for Local Needs Affordable Housing	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
17	GN 22 – Specialist and Supported Accommodation	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.
	GN 23 – Specialist and Supported Accommodation Allocations		This policy identifies specialist and supported allocations which are considered in further detail below.
	SSA/089/01 South west of Park House, Tenby	I	Screened in for: Bristol Channel SAC; Carms Bay SAC; Yerboston Tops SAC; Carms Bay SPA
	SSA/089/LDP2/01 East of Park House, Tenby	I	Screened in for: Bristol Channel SAC; Carmarthen Bay SAC; Yerboston Tops SAC; Carmarthen Bay SPA
	SSA/135/LDP2/01 North of Bulford Road Bypass, Tiers Cross	I	Screened in for:

¹⁴ Part C.12. Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook, April 2021 Edition. UK: DTA Publications Limited.

¹⁵ 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...”

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	Policy	Category (criteria A-M)	Screening conclusion
			Afonydd Cleddau SAC; Pembrokeshire Marine SAC
	SSA/088/LDP2/01 Redstone, Narberth	I	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.
	GT/095/LDP2/01 Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke	I	Screened in for: Bristol Channel SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly	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
	GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site	I	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	I	Screened in for: Limestone Coast SAC; Pembrokeshire Bat Sites and Bosherston Lakes SAC; Pembrokeshire Marine SAC
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.

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	Policy	Category (criteria A-M)	Screening conclusion
			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

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	Policy	Category (criteria A-M)	Screening conclusion
			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	<p>Part 1</p> <p>screened out: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on European sites.</p> <p>However the policy explicitly refers to <i>‘The choice of route and / or site minimises the impact on the built and natural environment, landscapes and property.’</i></p> <p>and it is considered that</p> <p>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.</p> <p>Part 2: Safeguarded routes are screened below.</p>
	TS/LDP2/03 Road & Footpath Well Hill improvement, Pembroke Well Hill - Pembroke	I	<p>Screened in: The site is <1 km from the Pembrokeshire Marine SAC</p> <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</p>
	TS/LDP2/04 Public Transport Interchange Milford Haven public transport interchange Milford Haven Train Station	I	<p>Screened out: This allocation does not detail the proposal. However, due to the location of development it is unlikely to have a significant effect.</p> <p>Other policies of the Plan in particular SP12, GN 41 and GN 47 will ensure that development is carried out appropriately.</p>
	TS/LDP2/05 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Train Station	I	<p>Screened out: Cleddau River SAC is close to the safeguarded area. This allocation does not detail the proposal. However, due to the location of development it is unlikely to have a significant effect.</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>

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	Policy	Category (criteria A-M)	Screening conclusion
			Afonydd Cleddau SAC; Pembrokeshire Marine SAC
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 extraction.</p>	B	<p>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.</p> <p>Part 2: The site allocation at Trefigin is screened below.</p>
	<p>MN/000/LDP2/001</p> <p>Trefigin Quarry extension</p>	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</p>
30	<p>GN 38 – Safeguarding and Prior Extraction of the Mineral Resource</p>	B	<p>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 <i>‘Where sites are protected for their nature conservation importance, prior extraction will not be sought – indeed, it is highly unlikely that any form of mineral extraction would be permitted in such circumstances.’</i></p>
31	<p>GN 39 – Secondary Aggregates and Recycled Waste Minerals</p>	B	<p>Screened out: policy listing general criteria for the acceptability of proposals.</p>
32	<p>GN 40 – Buffer Zones around Mineral Sites</p>	A	<p>Screened out as policy does not lead to development.</p>
33	<p>GN 41 Protection of National Statutory Environmental Designations</p>	D/E	<p>Screened out Environmental protection/site safeguarding policy</p> <p>Policies or proposals which steer change in such a way as to protect European sites from adverse effects</p>
34	<p>GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits</p>	D	<p>Screened out Environmental protection/site safeguarding policy</p>
35	<p>GN 43 Protection of Trees, Woodlands and Hedgerows</p>	D	<p>Screened out Environmental protection/site safeguarding policy</p>

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	Policy	Category (criteria A-M)	Screening conclusion
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	B	<p>Screened out: policy lists general criteria applying in defined coastal change management areas which are in proximity to European sites.</p> <p>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.</p> <p>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.</p>
39	GN 47 Water Quality and Protection of Water Resources	B/D/E	<p>Screen out: Policies listing general criteria for testing the acceptability/ sustainability of proposals.</p> <p>Environmental protection/site safeguarding policy. Policies or proposals which steer change in such a way as to protect European sites from adverse effects.</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 - Policy deleted.		
43	GN 51 – Protection and Creation of Outdoor Recreation Areas	D	Screened out: Policies listing general criteria for testing the acceptability.
44	GN 52 – Protection of Open Spaces with Amenity Value	D	Screened out: Policies listing general criteria for testing the acceptability.
45	GN 53 Community Growing Spaces	B	Screened out: Policies listing general criteria for testing the acceptability.
46	GN 54 – Visitor Attractions and Leisure Facilities	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect on designated sites. The policy is not spatially specific but the potential proximity of new sites to designated sites and the inherent sensitivity of many sites to visitor pressure including potential impacts on water quality creates the

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

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	Policy	Category (criteria A-M)	Screening conclusion
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 storage facility (Puma Energy)	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Castlemartin Coast SPA
	S/EMP/000/00004 Waterston – tank farm and LNG	I	Screened in for: W Wales Marine SAC; Pembrokeshire Marine SAC; Limestone Coast SAC; Pembrokeshire Bat Sites and Bosherton Lakes SAC; Castlemartin Coast SAC
	EMP/146/00001 Waterston Industrial Estate	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC
	S/EMP/095/00001 Pembroke Power Station Site	I	W Wales Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Bristol Channel SAC; Pembs Marine SAC
	S/EMP/096/00005 Kingswood Industrial Estate, Pembroke Dock	I	Screened in for: Bristol Channel SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Pembs Marine SAC; Yerboston Tops SAC
	S/EMP/096/00006 Waterloo and London Road Industrial Estate, Pembroke Dock	I	Screened in for: Bristol Channel SAC; Limestone Coast SAC; Pembs Marine SAC; Pembs Bat Sites and Bosh Lakes SAC; Yerboston Tops SAC
	S/EMP/000/00002 Valero Refinery, Rhoscrowther	I	Screened in for: W Wales Marine SAC; Pembs Marine SAC; Limestone Coast SAC; Pembs Bat Sites and Bosh Lakes SAC; Castlemartin Coast SPA
	EMP/034/00006 Celtic Link Business Park, Scleddau	I	Screened in for: Afonydd Cleddau SAC
	S/EMP/136/00001 Trecwn	I	Screened in for: Afonydd Cleddau SAC; W Wales Marine SAC; N Pembs Woodlands SAC; Preseli SAC; St Davids SAC

	Policy	Category (criteria A-M)	Screening conclusion
	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

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

European Sites

Table 3.2 Screening of European Sites

Impact Pathway	Affected Designated Site	Screened in for AA
Atmospheric Pollution	Afonydd Cleddau SAC Pembrokeshire Marine SAC	Yes – Major roads were located within 200m of the sites.
	Carmarthen Bay Dunes SAC Northwest Pembrokeshire Commons SAC	No – lack of likely commuting routes associated with allocations.
Water Quality	Afonydd Cleddau SAC (Nutrient Neutrality) Pembrokeshire Marine SAC Carmarthen Bay SAC Carmarthen Bay SPA. Cardigan Bay SAC Afon Teifi SAC Gweunydd Blaencleddau SAC North Pembrokeshire Woodlands SAC	Yes – Construction related water quality to all sites and phosphates related LSE to the Afon Teifi and Afonydd Cleddau.
Recreation	All sites excluding : Grassholm SPA, Skomer Stokholm and Seas off Pembrokeshire SPA Carmarthen Bay Dunes SAC	Yes, all sites excluding those listed as exempt due to distance.
Direct Habitat Loss	None	No – there are no allocations within the

Impact Pathway	Affected Designated Site	Screened in for AA
		boundaries of any European Site
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 – 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

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

Bristol Channel Approaches SAC	Preseli SAC
St David's SAC	Gweunydd Blaencleddau SAC
Ramsey and St David 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
	Northwest Pembrokeshire Commons SAC

52. The following sites have been screened out due to there being no likely significant effects:

- Grassholm SPA
- Skomer Stokholm and Seas off the Shore of Pembrokeshire SPA

Table 3.1 Summary of policies requiring Stage 2 Appropriate Assessment

Strategic Policy	Screening Outcome
SP2: Housing requirement	Screened In
SP3: Affordable housing Target	Screened In

Strategic Policy	Screening Outcome
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
SP14: Strategic Employment Provision The policy has two Parts Part 1 includes policy provisions for the sites allocated. Part 2 sets out a list of allocations.	Part 1: Screened Out Part 2: Screened In
S/EMP/086/LDP/01 Blackbridge	Screened in
S/EMP/136/00001 Former RNAD Site, Trecwn	Screened in
S/EMP/034/00003 Goodwick	Screened in
S/EMP/040/00004 Withybush Cluster (Trading Estate)	Screened in
S/EMP/040/00005 Withybush Cluster (North of East 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 Out Part 2 Screened in
S/EMP/000/00002 Pembroke Oil Refinery (Valero)	Screened In
S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)	Screened In
S/EMP/000/00004 Waterston Tank Farm and LNG, Milford Haven	Screened In
S/EMP/000/00007 South Hook LNG (part)	Screened In
S/EMP/095/00001 Pembroke Power Station	Screened In
S/EMP/034/00003 S/EMP/034G/C1 Goodwick Industrial Estate	Screened In
S/EMP/040/00011 S/EMP/040/C1 Withybush cluster (East Estate)	Screened In
S/EMP/040/00012 S/EMP/040/C1 Withybush cluster (North Estate)	Screened In
S/EMP/040/00015 S/EMP/040/C1 Withybush cluster (Lodge Estate)	Screened In
S/EMP/086/0000 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/096/0000 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

Strategic Policy	Screening Outcome
S/EMP/096/00006 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Waterloo & London Road Industrial Estate)	Screened In
S/EMP/096/00007 S/EMP/096/C3 Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)	Screened In
SP16: Retail Hierarchy	Screened In
SP17: Visitor Economy	Screened In
SP20: Transport Infrastructure and Accessibility	Screened In

General Policy	Screening outcome
GN 5 Renewable Energy – target and allocations The policy consists of 2 parts: <ul style="list-style-type: none"> ▪ Part 1: sets out the target per annum for renewable energy generation. ▪ Part 2: allocates two sites for solar arrays. 	For Part 1 Screened out For Part 2 The sites are screened below.
SPV/066/LDP2/01 East of Hazelbank, Llanstadwell	Screened in
SPV/149/LDP2/01 West of Ford Farm, Wolfscastle	Screened in
GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)	Screened in:
GN 7 Cawdor Barracks including the former Brawdy Airfield	Screened in:
GN 8 Employment Proposals	Screened in:
GN 9 Employment Allocations	This policy identifies employment site allocations
EMP/030/00001 Parc Gwynfryn, Crymych	Screened in
EMP/034/00006 Celtic Link Business Park, near Scleddau	Screened in
EMP/040/LDP2/01 Witybush 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
GN 10 Mixed-use Housing and Employment Proposals This policy is a two-part policy. Part 1 sets out the circumstances under which a mixed-use site will be permitted. Part 2 identifies two site allocations.	Part 1 Screened in For Part 2 This policy identifies mixed use allocations which are summarised below.
MXU/040/01 Old Hakin Road, Haverfordwest	Screened in
MXU/095/LDP2/01 South Quay, Pembroke	Screened in
GN 11 Protection of Employment Sites and Buildings	Screened in:
GN 12 Extensions to Employment Sites	Screened in:
GN 13 Residential Development	Screened in:
GN 16 – Residential Allocations Sites have been allocated for residential development	This policy identifies residential allocations which are considered in further below.

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General Policy	Screening outcome
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
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
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/120/00018NW of Wesley Way Spittal	Screened in
HSG/123/LDP/01 North of Parsons Green St Florence	Screened in
HSG/132/LDP2/1 West of Kings Park Farm Templeton	Screened in
HSG/135/LDP2/1 North of Bulford Road Bypass Tiers Cross	Screened in
HSG/149/LDP2/1 Land at Ford Farm Wolfscastle	Screened in
GN 18 Slade Lane, Haverfordwest	This policy identifies a residential allocation which was screened in under Policy GN 16.
GN 19a Maesgwynne, Fishguard	This policy identifies a residential allocation which was screened in under Policy GN 16.
GN 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
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 Adjacent to Monkton Playing Field	Screened in
GN 25 – Gypsy and Traveller Sites and Pitches	Screened in:

General Policy	Screening outcome
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 the routes for these are known, to safeguard them from other developments that might compromise their implementation.</p>	<p>Part 1 screened out:</p> <p>Part 2: Safeguarded routes are screened below.</p>
TS/LDP2/03 Road & Footpath Well Hill improvement, Pembroke Well Hill - Pembroke	Screened in:
TS/LDP2/04 Public Transport Interchange Milford Haven public transport interchange Milford Haven Train Station	Screened out:
TS/LDP2/05 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Train Station	Screened out:
TS/LDP2/08 Public Transport Interchange Haverfordwest public transport interchange Haverfordwest Bus Station	Screen in
<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 extraction.</p>	<p>Part 1: Screened out:</p> <p>Part 2: The site allocation at Trefigin is screened below.</p>
MN/000/LDP2/001 Trefigin Quarry extension	Screened in:
GN 54 – Visitor Attractions and Leisure Facilities	Screened in:
GN 55 – Serviced and Hotel Accommodation	Screened in:
GN 56 – Caravan, Camping and Chalet Development	Screened in:
GN 57 – Site Facilities on Existing Caravan and Camping Sites	Screened in:
GN 58 Self-Catering Accommodation	Screened in:

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

4. HRA Stage 2 Appropriate Assessment

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

Table 4.1 Summary of Stage 1 Screening.

Impact Pathway	Affected Designated Site	Screened in for AA
Atmospheric Pollution	Afonydd Cleddau SAC Pembrokeshire Marine SAC	Yes
Water Quality	Afonydd Cleddau SAC (Nutrient Neutrality) Pembrokeshire Marine SAC Carmarthen Bay SAC Carmarthen Bay SPA. Cardigan Bay SAC Afon Teifi SAC Gweunydd Blaencleddau SAC North Pembrokeshire Woodlands SAC	Yes

Appendix D

Impact Pathway	Affected Designated Site	Screened in for AA
Recreation	All sites excluding : Grassholm SPA, Skomer Stokholm and Seas off Pembrokeshire 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

5. Mitigation

General Measures

54. The Screening in Section 3 HRA Stage 1 Screening showed that there will be LSE to designated sites via non-phosphorous related water quality, loss of functionally linked land and disturbance to terrestrial species.
55. 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.
56. 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 LSE 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 LSE at the project level.
57. In respect to habitat loss and species harm, construction may reduce the quality of habitats through indirect loss of functionally linked land, including foraging habitat. At the plan level, the locations of functionally linked land is not commonly assessed as it not reasonable during the high-level assessment of plans. It should be noted that foraging and commuting habitat may be reduced for species such as birds, otter, and bats due to the proximity of allocations to European sites within the Plan Area (See Figure 1.1).
58. In addition to this, species may be harmed or killed during construction phases of allocations. The current mitigation within the LDP2, *SP12 Maintaining and enhancing the Environment* and *GN41 Protection of National Statutory Environmental Designations*, is not sufficient to mitigate the loss of functionally linked land. As such, adverse effects are likely to occur unless the current mitigation is strengthened to specifically address LSE at the project level.
59. Disturbance may occur during construction due to increased personnel and noise during construction phases of the allocations. The current mitigation within the LDP2, *SP12 Maintaining and enhancing the Environment* and *GN41 Protection of National Statutory Environmental Designations*, is not sufficient to mitigate disturbance. As such, adverse effects are likely to occur unless the current mitigation is strengthened to specifically address LSE at the project level.
60. As such, additional mitigation is required to fully mitigate LSE resulting from the following Policies and allocations:

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
SP14: Strategic Employment Provision
The policy has two Parts Part 1 includes policy provisions for the sites allocated. Part 2 sets out a list of allocations. Part 1: Screened Out Part 2: Screened In
S/EMP/086/LDP/01 Blackbridge
S/EMP/136/00001 Former RNAD Site, Trecwn
S/EMP/034/00003 Goodwick
S/EMP/040/00004 Withybush Cluster (Trading Estate)
S/EMP/040/00005 Withybush Cluster (North of East Estate)
S/EMP/040/00001 Withybush Cluster (West Estate)
S/EMP/086/LDP2/01 Thornton
S/EMP/096/00001 Pembrokeshire Science and Technology Park Cluster
SP15: Safeguarding of Existing Employment Sites
The policy has two Parts
Part 1 includes policy provisions for the sites allocated
Part 2 sets out a list of allocations. Part 1 Screened Out Part 2: Screened in
S/EMP/000/00002 Pembroke Oil Refinery (Valero)
S/EMP/000/00003 Milford Haven petro-chemical storage facility (Puma Energy)
S/EMP/000/00004 Waterston Tank Farm and LNG, Milford Haven
S/EMP/000/00007 South Hook LNG (part)
S/EMP/095/00001 Pembroke Power Station
S/EMP/034/00003 S/EMP/034G/C1 Goodwick Industrial Estate
S/EMP/040/00011 S/EMP/040/C1 Withybush cluster (East Estate)
S/EMP/040/00012 S/EMP/040/C1 Withybush cluster (North Estate)
S/EMP/040/00015 S/EMP/040/C1 Withybush cluster (Lodge Estate)
S/EMP/086/0000 S/EMP/086/C1 Thornton Industrial Estate cluster
S/EMP/096/00003 S/EMP/096/C1 Pembroke Dock cluster (West Llanion)
S/EMP/096/0000 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)

Strategic Policy
S/EMP/096/00006 S/EMP/096/C2 Waterloo & London Road Industrial Estate cluster (Waterloo & London Road Industrial Estate)
S/EMP/096/00007 S/EMP/096/C3 Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)
SP16: Retail Hierarchy
SP17: Visitor Economy
SP20: Transport Infrastructure and Accessibility
SP21: Waste Prevention and Management

General Policy
GN 5 Renewable Energy – target and allocations
The policy consists of 2 parts: <ul style="list-style-type: none"> ▪ Part 1: sets out the target per annum for renewable energy generation. ▪ Part 2: allocates two sites for solar arrays.
SPV/066/LDP2/01 East of Hazelbank, Llanstadwell
SPV/149/LDP2/01 West of Ford Farm, Wolfscastle
GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)
GN 7 Cawdor Barracks including the former Brawdy Airfield
GN 8 Employment Proposals
GN 9 Employment Allocations
EMP/030/00001 Parc Gwynfryn, Crymych
EMP/034/00006 Celtic Link Business Park, near Scleddau
EMP/040/LDP2/01 Withybush Showground, 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
GN 10 Mixed-use Housing and Employment Proposals
This policy is a two-part policy.
Part 1 sets out the circumstances under which a mixed-use site will be permitted. Screened in.
Part 2 identifies two site allocations.
MXU/040/01 Old Hakin Road, Haverfordwest
MXU/095/LDP2/01 South Quay, Pembroke
GN 11 Protection of Employment Sites and Buildings
GN 12 Extensions to Employment Sites
GN 13 Residential Development
GN 16 – Residential Allocations Sites have been allocated for residential development
HSG/040/LDP2/1 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

General Policy	
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
HSG/096/LDP2/1	Land at Hampshire Drive Pembroke Dock
HSG/096/LDP2/2	West of Stranraer Road 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 Jeffreyston
HSG/049/LDP2/1	East of Brookfield Close and West of Bridge Lane Keeston
HSG/060/LDP2/1	Adjacent to Maesybryn Llandissilio
HSG/066/LDP2/1	East of Hazelbank Llanstadwell
HSG/081/LDP2/1	West of Globe Inn Maenclochog
HSG/099/LDP2/1	Land at Coppins Park Pentlepoir

General Policy
HSG/113/LDP2/01 South of Robeston Court Robeston Wathen
HSG/114/LDP/01 East of Pilgrim's Way Roch
HSG/119/LDP2/1 Between Cornerways and Austalise Simpson Cross
HSG/120/00018NW of Wesley Way Spittal
HSG/123/LDP/01 North of Parsons Green St Florence
HSG/132/LDP2/1 West of Kings Park Farm Templeton
HSG/135/LDP2/1 North of Bulford Road Bypass Tiers Cross
HSG/149/LDP2/1 Land at Ford Farm Wolfscastle
GN 18 Slade Lane, Haverfordwest This policy identifies a residential allocation which was screened in under Policy GN 16.
GN 19a Maesgwynne, Fishguard This policy identifies a residential allocation which was screened in under Policy GN 16.
GN 19b South of Conway Drive, Castle Pill Road, Steynton – This policy identifies a residential allocation which was screened in under Policy GN 16.
GN 21 – Exception Sites for Local Needs Affordable Housing
GN 22 – Specialist and Supported Accommodation
GN 23 – Specialist and Supported Accommodation Allocations
SSA/089/01 South west of Park House, Tenby
SSA/089/LDP2/01 East of Park House, Tenby
SSA/135/LDP2/01 North of Bulford Road Bypass, Tiers Cross
SSA/088/LDP2/01 Redstone, Narberth
GN 24 Gypsy and Traveller Site Allocations
GT/095/LDP2/01 Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke
GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly
GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site
GT/095/LDP2/02 Adjacent to Monkton Playing Field
GN 25 – Gypsy and Traveller Sites and Pitches
GN 28 – Protection and Enhancement of the Historic Environment
GN 29 – Community Facilities
GN 30 – Community Facility Allocations
CF/040/01 New Primary School, Slade Lane, Haverfordwest Screened under Policy GN 16 – Slade Lane allocation.
CF/086/LDP2/01 New Primary and Secondary Schools, Milford Haven
GN 31 – Retail and Commercial Centre Development
GN 32 – Out-of-Centre Retail and Commercial Development
GN 33 – Farm Diversification
GN 34 – Conversion or Change of Use of Agricultural Buildings
GN 35 – Marinas
GN 36 – Transport Routes and Improvements This policy has two elements. Part 1 provides a criteria-based approach for the evaluation of new transport schemes. Part 2 identifies the main proposals in the Plan area for improvements to the transport network and, wherever the routes for these are known, to safeguard them from other developments that might compromise their implementation.

General Policy		
TS/LDP2/03	Road & Footpath Well Hill improvement, Pembroke	Well Hill - Pembroke
TS/LDP2/08	Public Transport Interchange Haverfordwest Bus Station	Haverfordwest public transport
<p>GN 37 – Working of Minerals This policy has two parts. Part 1 sets out the criteria for considering minerals development. Part 2 allocates the site at Trefigin for sand and gravel extraction. Part 1: Screened out: Part 2: The site allocation at Trefigin is screened below.</p>		
MN/000/LDP2/001 Trefigin Quarry extension		
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		
<p>GN 59 – Waste Management Facilities The policy is in two parts. Part 1 lists criteria for the consideration of waste management facilities. Part 2 lists employment sites allocated under other policies of the Plan that are potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. Part 1 Screened in: Part 2 Potential sites have been screened in – see below.</p>		
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, Scleddau		
S/EMP/136/00001 Trecwn		
EMP/030/00001 Parc Gwynfryn, Crymych		
GN 60 – Disposal of Waste on Land		

61. To mitigate the above policies, the wording of SP12 *Maintaining and Enhancing the Environment* must be amended to include the requirements for all allocations, both residential and non-residential to include a project level HRA requirement to assess potential LSEs to European sites within 10km of the proposed development site as is suggested by the DTA Guidelines.
62. 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.

63. Additionally, LSE will be mitigated by the amendment of the wording in GN41 *Protection of National Statutory Environmental Designations*. The current 50m buffer for National designated sites is not sufficient to assess impacts. An appropriate zone of influence should be determined during environmental assessments, such as Preliminary Ecological Appraisals, taking into account the hydrological connectivity of the site to the proposed works, the scope of the works, and the presence of mobile species. It is recommended that a general buffer of 10km is used. Additional consideration should be taken for mobile species such as bats, chough, and sites that have hydrological connectivity to sites.
64. 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 Report¹⁶ and the Pollution Control Construction Site Handbook¹⁷. 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.
65. As such, the mitigation above avoids adverse effects on designated sites for the aforementioned impact pathways.

Recreation

66. The following European sites have been screened in due to residential allocations being located within 7km of the site (**Table 5.1**). Where a residential allocation has been identified within the zone of influence, the increased population has been estimated using a population of 2.4 per dwelling or unit as per the National Statistics population estimations¹⁸. A full list of allocations screened in for recreation can be found in Appendix C.

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

17 Shared Regulatory Services Wales (2018) Pollution Control Construction Site Handbook.

[SRS PollutionControlHandbook ConstructionA4 E](#)

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

Table 5.1 Designated Sites screened in for recreational LSE

Designated Site	Total Allocations	Total Number of units	Population Increase
Bristol Channel Approaches SAC	15	550	1320
West Wales Marine SAC	10	482	1156
Afon Teifi SAC	4	112	268
Afonydd Cleddau SAC	28	1619	3886
Carmarthen Bay SAC	6	118	283
Pembrokeshire Marine	42	1927	4624
Cardigan Bay	2	78	187
Gweunydd Blaencleddau	3	49	117
Limestone Coast SAC	8	390	936
North Pembrokeshire Woodlands SAC	4	269	645
Pembrokeshire Commons SAC	0	0	0
Preseli SAC	4	87	208
St David's SAC	4	272	653
Yerbeston Tops SAC	5	104	249
Pembrokeshire Bat Sites and Bosherton Lakes SAC	21	829	1989
Ramsey and St David Peninsula SPA	1	18	43
Castlemartin Coast SPA	23	1081	2594
Carmarthen Bay SPA	6	118	283

Marine¹⁹

67. Policy E1(h) of the Pembrokeshire Coast National Park Management Plan 2020-2024²⁰ states 'Implement the management schemes for Pembrokeshire Marine Special Area of Conservation, Carmarthen Bay and Estuaries European Marine Sites and Cardigan Bay Special Area of Conservation (priority actions include awareness raising, sustainable management of living resources such as bait and seaweed, marine litter and marine invasive species monitoring), supporting management of neighbouring marine Special Protection Areas as appropriate and collaborating in delivery of Marine Protected Area Network Management Action Plans.' Policy W1(l) states 'Manage the Milford Haven Waterway in line with the Milford Haven Waterway 5 year Recreation Management Plan 2016m and enforce Waterway, harbour, beach, and byelaws.' and Policy W1(o) 'Manage recreational disturbance to species and

¹⁹ Cardigan Bay SAC, West Wales Marine SAC, Pembrokeshire Marine SAC, Carmarthen Bay SAC and Bristol Channel Approaches SAC

²⁰ Pembrokeshire Coast National Park Authority (2019) Pembrokeshire Coast national Park Management Plan 2020-2024 [National-Park-Management-Plan-2020-2024-Eng.pdf \(pembrokeshirecoast.wales\)](#)

species groups, such as cliff nesting birds and marine mammals, through codes of conduct, restrictions and awareness-raising.'

68. The condition assessment for Pembrokeshire Marine SAC²¹ and Cardigan Bay SAC²² 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.
69. Cardigan Bay SAC and Pembrokeshire Marine SAC have a website^{23,24} 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.
70. 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 Code²⁵ and the Pembrokeshire Marine Code²⁶ 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/>).
71. 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*²⁷ 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

21 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

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

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

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

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

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

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

managed by the adherence to wildlife codes of conduct (e.g the WiSe scheme <http://www.wisescheme.org/>).

72. Recreational net fishing in Wales occurs at a very low density and has been shown to have little to no bycatch.
73. 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

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

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

European Site	Mitigation
St David's SAC	<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 Pembrokeshire²⁸ has educational information regarding dog-walking and ground nesting birds, asking that visitors follow the Canine Code²³, 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 E1(m) of the Pembrokeshire Coast National Park Management Plan 2020-2024¹⁵ states '<i>manage recreational disturbance to species and species groups such as cliff nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.</i>' Policy W1(f) states that the National Park Authority will '<i>Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.</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 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>
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. David's²⁹. 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</p>

28 Visiting Pembrokeshire with your dog | National Trust

29 St David's Head coastal walk | Wales | National Trust

European Site	Mitigation
	<p>associated with areas used by walkers, and thus reproductive success will not be disturbed by an increase of dog walkers. The SAC is located within the Pembrokeshire National Park. Policy E1(m) of the Pembrokeshire Coast National Park Management Plan 2020-2024¹⁵ states '<i>manage recreational disturbance to species and species groups such as cliff nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.</i>' Policy W1(f) states that the National Park Authority will '<i>Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.</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 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>
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 2020-2024¹⁵ Policy W1(f) states '<i>Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.</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>
Castlemartin coast SPA	<p>The Pembrokeshire Coast path runs alongside the site and may decrease disturbance by keeping visitors localised. The red-billed chough is not a nesting bird and thus will not be disturbed by an increase of dog walkers. Policy E1(m) of the Pembrokeshire Coast National Park Management Plan 2020-2024¹⁵ states '<i>manage recreational disturbance to species and species groups such as cliff nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.</i>'. Policy W1(f) states that the National Park Authority will '<i>Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.</i>'</p>

European Site	Mitigation
	<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>Pembrokeshire Bat Sites and Bosherton Lakes SAC</p>	<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.</p> <p>Stackpole Courtyard Flats and Walled Garden SSSI is managed by the National Trust and Carew Castle SSSI is managed by the PCNPA. Policy E1(m) of the Pembrokeshire Coast National Park Management Plan 2020-2024¹⁵ states '<i>manage recreational disturbance to species and species groups such as cliff nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.</i>'. Policy W1(f) states that the National Park Authority will '<i>Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.</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.</p>
<p>North Pembrokeshire Woodlands SAC</p>	<p>Pengelli SSSI has walking trails and is managed by the Wildlife Trust of South & West Wales. Trails and recreation in Allt Pontfaen SSSI are managed by the Pembrokeshire Coast National Park. Policy E1(m) of the Pembrokeshire Coast National Park Management Plan 2020-2024¹⁵ states '<i>manage recreational disturbance to species and species groups such as cliff nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.</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>

European Site	Mitigation
	<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>
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 Management Plan 2020-2024¹⁵ states '<i>Undertake particular measures to conserve species for which Pembrokeshire is uniquely important (e.g. Southern damselfly, a feature of the Preseli Special Area of Conservation).</i>' Policy W1(f) states that the National Park Authority will '<i>Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.</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 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>
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>
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>

European Site	Mitigation
	<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 E1(m) of the Pembrokeshire Coast National Park Management Plan 2020-2024¹⁵ states t '<i>manage recreational disturbance to species and species groups such as cliff nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.</i>' Policy W1(f) states that the National Park Authority will '<i>Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.</i>'</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 E1(m) of the Pembrokeshire Coast National Park Management Plan 2020-2024¹⁵ states '<i>manage recreational disturbance to species and species groups such as cliff nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.</i>' Policy W1(f) states '<i>Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.</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 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>
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>
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</p>

European Site	Mitigation
	preserved and created where appropriate and will lessen the impact of recreation at European sites. Policy W1(f) states <i>'Manage potential/actual recreational pressures and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft.'</i>

75. 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.

Water Quality: Nutrient Neutrality

Afonydd Cleddau

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

77. The sites fall into one of three categories:

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

78. Nutrient related water quality impacts within the Afonydd Cleddau SAC and Afon Teifi SAC were found to lead to adverse effects on the aforementioned European sites. To mitigate the increase in TP to the Cleddau catchment, it was initially thought that all developments that may result in an increase in nutrients to the aforementioned catchments would have to demonstrate that they are nutrient neutral to satisfy the requirements of the Habitat Regulations. However, following review of Environmental Permits for WwTWs in the affected catchments, the Council is now required to consult with the water company, Dwr Cymru Welsh Water, to establish whether future developments proposed by the Plan can take place within the newly imposed limits, rather than to demonstrate nutrient neutrality. PCC has done this and the outcome has been that such capacity has been found to be available at all the WwTWs in the affected riverine catchments where new allocations (particularly for residential development) are proposed. NRW will then monitor operational compliance of

the water company at the WwTWs, to ensure that the new permit limits are being adhered to. Nonetheless, the protection of river water quality remains an important matter and this is reflected in the wording of LDP 2 policy GN 47 Water Quality and Protection of Water Resources. In some instances project level HRA may still be needed in conjunction with development proposals on allocated sites (particularly those for residential development) reflecting the need to also consider surface water disposal aspects and CSOs).

79. 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.
80. Following liaison with representatives of DCWW, it has been established that at the time of writing all impacted WwTWs have capacity within the current environmental permit limits, and it has been accepted that DCWW will ensure compliance with lower limits required by a future date where applicable. As stated in NRW 'Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation', **the Local Planning Authority will need to consult DCWW when an application is submitted to gain formal confirmation that there is capacity in place to accommodate the additional wastewater in compliance with revised permit limits. The formal confirmation from DCWW must also state that the sewer network and associated WwTW have hydraulic capacity for new connections without leading to an increase in the environmental impact of storm overflows.**
81. The tables below **(5.3 and 5.4)** identify the affected sites and their drainage status. It should be noted that whilst a number of allocations would use WwTWs discharging outside of the riverine SAC, the West Wales Nutrient Calculator (or relevant calculator) will need to calculate the change of land use in terms of changing the surface water regime and its ability to absorb phosphorous through the soil, as a Sustainable Drainage System may not achieve adequate mitigation.
82. For employment sites using private drainage systems, consideration at the project level HRA will need to be given as to whether or not the site would employ the local population and have a neutral impact or if it would draw from a wider pool of people from outside the catchment. A TLSE concludes that the scale and allocation of EMP/088/LDP/01 as a 1.88Ha local employment site suggests that it would employ from within the catchment and can be screened out. However, the scale and allocation of S/EMP/136/00001 as a 17.74 Ha

Strategic Employment Site suggests that it would employ from outside the catchment and a project level HRA will be required.

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

Allocation	Site Name and Settlement	Wastewater Treatment Works and Status
HSG/040/LDP2/1	Former Community Education Centre, Dew Street, Haverfordwest	Merlins Bridge WwTW – Outside SAC
S/HSG/040/LDP2/6	Slade Lane, Haverfordwest	Merlins Bridge WwTW – Outside SAC
HSG/088/LDP2/1	West of Bloomfield Gardens and North of Adams Drive & Highfield Park, Narberth	Narberth WwTW – Outside SAC
HSG/053/LDP2/01	Between Longstone Court and 62, St. Davids Road, Letterston	Letterston WwTW – Environmental Permit with capacity
HSG/022/LDP2/1	Land at Dungleddy Court, Clarbeston Road	Clarbeston Road – Environmental Permit with capacity
HSG/029/00014	Opposite Woodholm Close, Crundale	Crundale draining to Merlin's bridge WwTW - Outside SAC
HSG/029/LDP2/1	West of Ashford Park, Crundale	Crundale draining to Merlin's bridge WwTW - Outside SAC
HSG/081/LDP2/1	West of Globe Inn, Maenclochog	Maenclochog WwTW – Environmental Permit with capacity
HSG/049/LDP2/1	East of Brookfield Close and West of Bridge Lane, Keeston	Keeston WwTW – Environmental Permit with capacity
HSG/119/LDP2/1	Between Cornerways and Austalise, Simpson Cross	Keeston WwTW – Environmental Permit with capacity / Newgale WwTW – Outside SAC. Could use either WwTW due to site location
HSG/149/LDP2/1	Land at Ford Farm, Wolfscastle	Wolfscastle WwTW – Environmental Permit with capacity
HSG/120/00018	Northwest of Wesley Way, Spittal	Spittal WwTW – Environmental Permit with capacity
HSG/113/LDP2/1	South of Robeston Court, Robeston Wathen	No Mains Drainage – Private Treatment System
HSG/152/LDP2/1	South of Bro'r Dderwen, Clunderwen	Clunderwen WwTW – Environmental Permit with capacity
HSG/060/LDP2/1	Adjacent to Maesybryn, Llandissilio	Clunderwen WwTW – Environmental Permit with capacity

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

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

Allocation	Site Name and Settlement	Allocation Type	Wastewater Treatment Works
S/EMP/040/00012	Withybush cluster (North Estate), Haverfordwest	Safeguarded Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00005	Withybush cluster (East of Lodge Estate), Haverfordwest	Safeguarded Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00015	Withybush cluster (Lodge Estate), Haverfordwest	Safeguarded Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00011	Withybush cluster (East Estate), Haverfordwest	Safeguarded Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00004	Withybush cluster (Trading Estate), Haverfordwest	Strategic Employment	Merlins Bridge WwTW, outside SAC
S/EMP/040/00001	Withybush cluster (East of Lodge Estate), Haverfordwest	Strategic Employment	Merlins Bridge WwTW, outside SAC
EMP/040/LDP2/01	Withybush Showground, Haverfordwest	Employment	Merlins Bridge WwTW, outside SAC
EMP/088/LDP/01	Rushacre Enterprise Park extension, Narberth	Employment	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated.
EMP/053/00001	Old Station Yard, Letterston	Employment	Letterston WwTW – Environmental Permit with capacity
S/EMP/136/00001	Former RNAD Site, Trecwn	Strategic Employment	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated.
EMP/034/00006	Celtic Link Business Park, near Scleddau	Employment	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated. Site only partly within catchment.

Allocation	Site Name and Settlement	Allocation Type	Wastewater Treatment Works
GT/040/LDP2/01	Land east of Withybush Gypsy and Traveller site, near Haverfordwest	Gypsy and Traveller Site	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated.
SSA/088/LDP2/01	Redstone, Narberth	Specialist and Supported Accommodation	Private Treatment Works required. Project level HRAs to determine the amount of phosphorous to be mitigated. Site only partly within catchment.

Afon Teifi SAC

84. The Afon Teifi catchment is partially inside the Pembrokeshire County Council boundary. It is located in the northeastern portion of the boundary. Two residential allocations have been planned inside the Afon Teifi catchment during the LDP2 plan period. One residential allocation will utilise a Waste water Treatment Works that discharges to a non-SAC river and one would use a Waste water Treatment Works that has a revised environmental permit, for which DCWW have indicated there is capacity to accommodate additional foul flows within the phosphorous limit that has been imposed.

85. No non-residential allocations are proposed inside the catchment during the plan period.

86. As such, there will be no input of phosphates to the SAC (**Table 5.5**).

Table 5.5 Allocations located inside the Afon Teifi catchment.

Allocation		Wastewater Treatment Works
HSG/020/LDP2/1	Land at Tan Ffynnon Fields, Cilgerran	Cilgerran WwTW – Environmental Permit with capacity
HSG/006/00003	Adjacent to Hafod, Blaenffos	Blaenffos WwTW (Outside SAC) - Outside SAC

Air Quality

87. Impacts from air quality were screened in for both Pembrokeshire Marine and SAC and Afon Cleddau SAC due to main roads sitting within 200m of the SAC. 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

88. The only relevant feature considered to be sensitive to air pollution within the Pembrokeshire Marine SAC according to APIS is Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*). According to APIS road transport only accounts for 3.3% of sources of total Nitrogen deposition (KgN/ha/yr) from combined UK sources. The critical loads for this habitat according to APIS is 10 kgN/ha.yr for upper saltmarsh and for other, lower saltmarsh habitats a critical load of 20 – 30 kgN/ha/yr is applied. Two areas of salt marsh within 200m of a main road are London Road in Pembroke Dock and the A477 near Milton, which are classed as being of lower and mid saltmarsh respectively. The higher critical load values for both of these sites therefore apply and APIS data shows that the average total N deposition for the Pembrokeshire Marine SAC is 11.083 kgN/ha/yr (3.3% of 11.083 = 0.36 kgN/ha/yr) (with a maximum of 16.926 (3.3% of 16.926 = 0.56 kgN/ha/yr) which does not exceed the relevant critical loads. The relevant grid square data according to APIS indicates that the average total N deposition for the grid squares adjacent to (data for the actual grid square is not available) the London Road in Pembroke Dock point is 8.2kg N/ha/yr which is well below the critical loads. On the A477 near Milton, the total N deposition KgN/ha/yr for the relevant grid square is 8.3 N/ha/yr. Again, well below both the higher and lower critical loads for higher and lower saltmarsh.
89. There are two points, both the A4075 at Carew and on the A477 near Milton that also sit within 200m of the SAC. Here the saltmarsh is classed as mid saltmarsh. However, having put in the LDP allocation into trip generator for these locations, the Average Annual Daily Traffic flow will fall far below the 1000 AADT threshold provided by NRW, with Carew and Milton likely receiving 269 and 665 respectively. 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.
90. Although aerial ammonia concentrations have risen in Wales in recent years, this is largely due to changes in agricultural practice (>90% of ammonia emissions coming from agriculture according to NRW). In the context of this HRA impacts from additional traffic flows have been considered. Ammonia Critical levels (ug m⁻³) are given for Atlantic salt meadows, Coastal lagoons, Estuaries and mudflats and sand flats not covered by seawater at low tide. The critical level on APIS is 1 or 3. Where lichens and bryophytes form a key

part of the ecosystem integrity an annual mean of $1 \mu\text{g}/\text{m}^3$ applies, however where other vegetation is concerned (which is the case for the relevant features listed above, a critical level of $3 \mu\text{g}/\text{m}^3$ is applied. For the Pembrokeshire marine SAC the ammonia concentration $\mu\text{g}/\text{m}^3$ does not exceed 1.48 in any grid square and the specific points at which the main road sits within 200m of the SAC, a concentration of 1.1 is not exceeded. The site average is 0.866. Taking in to account the main source of ammonia being agriculture and the number of additional daily traffic flows as discussed above, along with the evidence that current concentrations of ammonia for the Pembrokeshire Marine SAC remaining well below the critical level of $3 \mu\text{g}/\text{m}^3$, it is considered that there will be no significant additional contributions to ammonia levels from the proposed plan.

91. 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.
92. 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

93. 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. Where a proposal has the potential to result in an increase in road traffic this will be assessed via independent project level HRA.
94. 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 $1 \mu\text{g}/\text{m}^3$ 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 $1.9 \mu\text{g}/\text{m}^3$ 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)

95. A specific commentary is provided on the above policy to take account of the Habitats Regulations Assessment carried out on behalf of Welsh Government³⁰. 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 Trefign Quarry Site Allocation (MN/000/LDP2/001)

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

³⁰ <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040-habitats-regulations-assessment.pdf>

6. The Integrity Test

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

Bristol Channel Approaches SAC	Preseli SAC
St David's SAC	Gweunydd Blaencleddau SAC
Ramsey and St David 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
	Northwest Pembrokeshire Commons SAC

99. All Plans and Policies will be mitigated if the measures described in Section 5 can be imposed and implemented. Individual allocations will be mitigated through project level HRAs to ensure that there is no adverse effect. As such, the LDP2 will lead to no adverse effect on European Sites listed above.

7. In Combination Assessment

Consideration of other policies

100. 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'.
101. There is therefore no requirement for an in-combination assessment at this stage of the assessment.

Consideration of other plans or projects

102. 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.
103. Both Pembrokeshire Coast National Park LDP2 HRA (dated September 2018)³¹ the current Ceredigion adopted LDP³² 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 Guidance³³ concluded that there would be no likely significant effect either alone or combination with other plans and projects on any European sites.
104. 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 NRW³⁴, 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

³¹ [LDP2HRA-CONSULTATION-FINAL-DRAFT-5-02-18.pdf \(pembrokeshirecoast.wales\)](https://www.pembrokeshirecoast.wales/LDP2HRA-CONSULTATION-FINAL-DRAFT-5-02-18.pdf)

³² <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/>

³³ <https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/integrated-sustainability-appraisal-and-habitats-regulations-assessment/>

³⁴ <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>

consideration by the planning authority (as of August 2024) and an estimate for windfall potential in the catchment area).

105. The Pembrokeshire Coast National Park Authority and Ceredigion County Council are required to undertake similar assessments for new development proposals under their respective adopted Local Development Plans.
106. In line with the above, there is therefore no requirement to undertake a full in-combination assessment.

8. Appendix A Standard Mitigation and Avoidance Measures

Overview

107. The 'avoidance measures' that may be applied to the options are detailed below, and are grouped as follows:
- General Measures (project-level HRA.) which will be applied to all developments that may lead to Likely Significant Effects on Habitat Network Sites
108. 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.
109. Note that these measures are not exhaustive or exclusive and must be reviewed at the project stage, taking into account any changes in best-practice as well as scheme-specific survey information or studies.

General Measures and Principles

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

9. Appendix B HRA Stage 1 Screening: Initial Review

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

Designated Site	Designated Features	Allocations within thresholds		Impacts
Afonydd Cleddau SAC	<p>3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation – favourable (maintained)</p> <p>7110 Active raised bogs – unfavourable (unclassified)</p> <p>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>) – unfavourable (unclassified)</p> <p>1096 Brook lamprey <i>Lampetra planeri</i> – unfavourable (unclassified)</p> <p>1099 River lamprey <i>Lampetra fluviatilis</i> – unfavourable (unclassified)</p> <p>1163 Bullhead <i>Cottus gobio</i> – unfavourable (unclassified)</p> <p>1355 Otter <i>Lutra lutra</i> – favourable (maintained)</p> <p>1095 Sea lamprey <i>Petromyzon marinus</i> – unfavourable (unclassified)</p>	<p>HSG/040/LDP2/1</p> <p>HSG/053/LDP2/01</p> <p>HSG/029/00014</p> <p>HSG/029/LDP2/1</p> <p>HSG/081/LDP2/1</p> <p>HSG/119/LDP2/1</p> <p>HSG/149/LDP2/1</p> <p>HSG/120/00018</p> <p>HSG/113/LDP2/1</p> <p>HSG/152/LDP2/1</p> <p>HSG/060/LDP2/1</p> <p>HSG/022/LDP2/1</p> <p>S/EMP/040/00012</p> <p>S/EMP/040/00005</p> <p>S/EMP/040/00015</p> <p>S/EMP/040/00011</p> <p>S/EMP/040/00004</p> <p>S/EMP/040/00001</p> <p>EMP/040/LDP2/01</p> <p>EMP/088/LDP/01</p> <p>S/EMP/034/LDP/02</p> <p>S/EMP/034/00003</p> <p>S/EMP/086/00003</p> <p>S/EMP/086/LDP2/01</p> <p>EMP/132/LDP2/01</p> <p>EMP/093/00001</p> <p>EMP/030/00001</p>	<p>SPV/149/LDP2/01</p> <p>S/HSG/034F/LDP2/1</p> <p>S/HSG/040/LDP2/6</p> <p>HSG/030/LDP/01</p> <p>HSG/132/LDP2/1</p> <p>HSG/063/00024</p> <p>HSG/048/00038</p> <p>HSG/048/LDP2/1</p> <p>HSG/135/LDP2/1</p> <p>HSG/040/LDP2/3</p> <p>HSG/093/00066</p> <p>HSG/088/LDP2/1</p> <p>HSG/043/LDP2/1</p> <p>HSG/047/LDP2/1</p> <p>HSG/049/LDP2/1</p> <p>HSG/114/LDP/01</p> <p>EMP/053/00001</p> <p>S/EMP/136/00001</p> <p>EMP/034/00006</p> <p>S/EMP/000/00003</p> <p>S/EMP/000/00007</p> <p>CF/040/01</p> <p>CF/086/LDP2/1</p> <p>MXU/040/01</p> <p>EMP/000/LDP2/01</p> <p>EMP/030/LDP2/01</p> <p>GT/040/LDP2/01</p> <p>EMP/088/LDP/01</p> <p>SSA/088/LDP2/01</p> <p>SSA/135/LDP2/01</p> <p>GT/003/LDP2/01</p> <p>EMP/146/00001</p> <p>TS/LDP2/08</p>	<p>Atmospheric Pollution</p> <p>A road adjacent to site. Screened in for woodland habitat only. N Critical load data is not available for the remaining habitat types. Woodland habitats are located within 200m of the A40.</p> <p>Water quality (NN, pollution)</p> <p>15 residential allocations have been identified within the catchment. See paragraph 1.17.1 and table 6.3 for details. 13 non-residential allocations have been identified within the catchment. See paragraph 1.17.1 and table 6.4 for details.</p> <p>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.</p> <p>Functionally Linked Land / Indirect Habitat Loss</p> <p>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.</p> <p>No direct habitat loss is predicted.</p> <p>Recreation</p> <p>31 residential allocations are located within 7km of the site with a total of 1619 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 3886. 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>
Afon Teifi SAC	<ul style="list-style-type: none"> 3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation – favourable (maintained) 3130 Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or 	<p>HSG/122/00035</p> <p>HSG/020/LDP2/1</p> <p>HSG/006/00003</p> <p>HSG/030/LDP/01</p> <p>EMP/030/00001</p> <p>EMP/030/LDP2/01</p>		<p>Atmospheric Pollution</p> <p>Site is designated for freshwater habitats and species. 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</p> <p>Water quality (NN, pollution)</p>

Designated Site	Designated Features	Allocations within thresholds		Impacts
	<p>of the <i>Isoëto-Nanojuncetea</i> – favourable (unclassified):</p> <ul style="list-style-type: none"> • 1096 Brook lamprey <i>Lampetra planeri</i> – unfavourable (unclassified) reduced oxygen due to eutrophication • 1099 River lamprey <i>Lampetra fluviatilis</i> – unfavourable (unclassified) • 1106 Atlantic salmon <i>Salmo salar</i> – unfavourable (unclassified) • 1163 Bullhead <i>Cottus gobio</i> – unfavourable (unclassified) • 1355 Otter <i>Lutra lutra</i> – favourable (maintained) • 1831 Floating water-plantain <i>Luronium natans</i> – favourable (maintained) - eutrophication is an indication of unfavourable condition. • 1095: Sea lamprey <i>Petromyzon marinus</i> – unfavourable (unclassified) 	MN/000/LDP2/001		<p>Two allocations have been identified within the Teifi catchment. See paragraph 1.17.2 and table 6.5 for details. No non-residential allocations are located within the catchment.</p> <p>Water quality may also be degraded by construction contaminants and sediment. This may result in negative impacts to the designated fish species.</p> <p>Functionally Linked Land / Indirect Habitat Loss</p> <p>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.</p> <p>No allocations are predicted to cause degradation to the riparian habitat required to support otter populations as they are sufficiently distant from the site.</p> <p>Recreation</p> <p>Five residential allocations are located within 7km of the site with a total of 140 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 336 LSE is predicted.</p> <p>Disturbance – noise and sound</p> <p>All allocations are sufficiently distant from the site. The nearest allocation is approximately 1.1km to the south of the site.</p> <p>As such, no LSE is predicted.</p>
Bristol Channel SAC	1351: harbour porpoise (<i>Phocoena phocoena</i>)	<p>HSG/050/LDP2/1</p> <p>HSG/099/LDP2/1</p> <p>HSG/132/LDP2/1</p> <p>HSG/123/LDP/01</p> <p>HSG/052/LDP2/1</p> <p>HSG/052/00011</p> <p>HSG/095/00144</p> <p>HSG/095/LDP2/4</p> <p>HSG/096/00238</p> <p>HSG/095/LDP2/5</p> <p>HSG/095/LDP2/2</p> <p>HSG/095/LDP2/1</p> <p>HSG/046/LDP2/1</p> <p>HSG/003/LDP2/1</p> <p>HSG/047/LDP2/1</p>	<p>EMP/000/LDP2/01</p> <p>EMP/132/LDP2/01</p> <p>SSA/089/01</p> <p>SSA/89/LDP2/01</p> <p>MXU/095/LDP2/01</p> <p>GT/095/LDP2/1</p> <p>GT/095/LDP2/2</p> <p>S/EMP/096/00004</p> <p>S/EMP/096/00005</p> <p>S/EMP/096/00006</p> <p>S/EMP/096/00001</p> <p>S/EMP/096/00007</p> <p>HSG/093/00066</p> <p>HSG/066/LDP2/1</p> <p>HSG/096/LDP2/1</p> <p>HSG/096/LDP2/2</p> <p>S/EMP/096/00003</p> <p>S/EMP/096/00002</p> <p>S/EMP/095/00001</p> <p>GT/003/LDP2/01</p>	<p>Atmospheric Pollution</p> <p>Site is not located within 200m of any roads. As such, no LSE is predicted</p> <p>Water quality (pollution)</p> <p>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</p> <p>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</p> <p>15 residential allocations are located within 7km of the site with a minimum total of 550 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 1320. LSE is predicted.</p> <p>Disturbance – noise, vibration and sound</p> <p>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.</p> <p>As the site is marine, all terrestrial allocations will not result in LSE via disturbance pathways.</p>
West Wales Marine SAC	1351: harbour porpoise (<i>Phocoena phocoena</i>)	<p>HSG/086/LDP2/4</p> <p>HSG/086/LDP2/5</p> <p>HSG/086/LDP2/6</p> <p>HSG/086/00222</p>	<p>S/EMP/095/00001</p> <p>S/EMP/000/00004</p> <p>S/EMP/086/LDP2/01</p> <p>S/EMP/096/00003</p>	<p>Atmospheric Pollution</p> <p>Site is not located within 200m of any roads. As such, no LSE is predicted.</p> <p>Water quality (pollution)</p>

Designated Site	Designated Features	Allocations within thresholds		Impacts
		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	CF/086/LDP2/1 HSG/095/LDP2/1 HSG/046/LDP2/1 HSG/096/LDP2/2 HSG/096/00238 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	<p>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 utilize 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 Dock is located directly adjacent to the site. It is proposed that the Irish Sea Ferry will depart from Fishguard.</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. 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 1156. LSE is predicted.</p>
Carmarthen Bay Dunes SAC	<ul style="list-style-type: none"> 2110 Embryonic shifting dunes 2120 "Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")" 2130 "Fixed coastal dunes with herbaceous vegetation ("grey dunes")" * Priority feature 2170 Dunes with <i>Salix repens ssp. argentea</i> (<i>Salicion arenariae</i>) 2190 Humid dune slacks 1014 Narrow-mouthed whorl snail <i>Vertigo angustior</i> 1395 Petalwort <i>Petalophyllum ralfsii</i> 1903 Fen orchid <i>Liparis loeselii</i> 	No allocations but major road located within 200m of the European site		<p>Atmospheric Pollution No allocations associated with likely commuting routes within 200m of the dunes.</p> <p>Disturbance – noise and sound No allocations within 10km of the site. No LSE predicted.</p> <p>Functionally Linked Land / Indirect Habitat Loss No allocations within 10km of the site. No LSE predicted.</p> <p>Recreation No allocations within 7km of the site. No LSE predicted.</p>
Carmarthen Bay SAC	Annex II species that are a primary reason for selection of this site <ul style="list-style-type: none"> 1349 Bottlenose dolphin <i>Tursiops truncatus</i> Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site <ul style="list-style-type: none"> 1110 Sandbanks which are slightly covered by sea water all the time 1170 Reefs 	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		<p>Atmospheric Pollution Site is designated for marine habitats and species. 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</p>

Designated Site	Designated Features	Allocations within thresholds		Impacts
	<ul style="list-style-type: none"> 8330 Submerged or partially submerged sea caves Annex II species that are a primary reason for selection of this site 1095 Sea lamprey <i>Petromyzon marinus</i> 1099 River lamprey <i>Lampetra fluviatilis</i> 1364 Grey seal <i>Halichoerus grypus</i> 	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		<p>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 Six residential allocations are located within 7km of the site with a minimum total of 118 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 283. LSE is predicted.</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"> 1130 Estuaries 1160 Large Shallow inlets and bays 1170 Reefs <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"> 1110 Sandbanks which are slightly covered by sea water all the time 1140 Mudflats and sandflats not covered by seawater at low tide 1150 Coastal lagoons * Priority feature 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> 1364 Grey seal <i>Halichoerus grypus</i> 1441 Shore dock <i>Rumex rupestris</i> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> 1095 Sea lamprey <i>Petromyzon marinus</i> 1099 River lamprey <i>Lampetra fluviatilis</i> 1102 Allis shad <i>Alosa alosa</i> 1103 Twait shad <i>Alosa fallax</i> 1355 Otter <i>Lutra lutra</i> 	HSG/029/00014 HSG/029/LDP2/1 HSG/040/LDP2/1 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 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/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 EMP/132/LDP2/01 MXU/095/LDP2/01 EMP/093/00001 S/EMP/000/00003 S/EMP/000/00002 S/EMP/086/00003 S/EMP/096/00002 S/EMP/095/00001 S/EMP/096/00007 S/EMP/096/00004 S/EMP/096/00005 S/EMP/096/00006 S/EMP/040/00011 S/EMP/040/00012 S/EMP/000/00004 S/EMP/040/00015 S/EMP/086/LDP2/01 EMP/040/LDP2/01	<p>Atmospheric Pollution A road adjacent to site. Screened in for saltmarsh habitat only. N Critical load data is not available for the remaining habitat types. Saltmarsh is located within 200m of the A477, A4076 and A4075. LSE is predicted.</p> <p>Water Quality A reduction in water quality is likely to occur at the site near Milford Haven due to the large amount of port development and increase in moored boats along the coast. Development may increase turbidity and sediment concentrations of the site. Construction and operational related contaminants may also enter the waterway, reducing the quality of the site. As such, LSE is predicted for all designated features.</p> <p>Recreation 42 residential allocations are located within 7km of the site with a minimum total of 1927 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 4624. LSE is predicted.</p> <p>Functionally Linked Land / Indirect Habitat Loss An increase in commercial and recreational boats inside the Haven Waterway and along the Pembrokeshire coast may result in habitats becoming undesirable due to mooring and contaminants being expelled from ships within the site. LSE is predicted.</p> <p>Disturbance Works in Milford Haven, specifically relating to Haven South and Haven North may cause disturbance to grey seals and fish species that utilise the bay and associated tributaries inside the site. There is a significant amount of works allocated in Milford Haven, mainly employment, which will lead to LSE to the designated species mentioned above.</p>

Designated Site	Designated Features	Allocations within thresholds		Impacts
		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	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	
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"> • 1110 Sandbanks which are slightly covered by sea water all the time • 1170 Reefs • 8330 Submerged or partially submerged sea caves <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> • 1349 Bottlenose dolphin <i>Tursiops truncatus</i> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> • 1095 Sea lamprey <i>Petromyzon marinus</i> • 1099 River lamprey <i>Lampetra fluviatilis</i> • 1364 Grey seal <i>Halichoerus grypus</i> 	HSG/122/00035 HSG/020/LDP2/1		<p>Atmospheric Pollution No roads located within 200m. No LSE predicted.</p> <p>Water Quality There is hydrological connectivity between the site and a residential allocations. These allocations include Awel y Mor Extension (HSG/122/00035), and 10 open-space and amenity land allocations, many of which are directly adjacent to the Afon Teifi which drains to Cardigan Bay SAC.</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 is one allocation within 7km of the site. This allocation is Awel y Mor Extension (HSG/122/00035). This allocation proposes the development of a minimum of 24 dwellings. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 58.</p> <p>Grey seals and bottle-nosed dolphins may be disturbed (noise & visual) by increased recreational use of the site via human and boat disturbance. All features, with the exception of sand banks, can be disturbed by casual beach recreation and littering, thus reducing the environmental quality of the site. Increased recreation is listed as a potential pressure to the site³⁵.</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	Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site	HSG/006/00003		Atmospheric pollution

³⁵ 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 \(naturalresources.wales\)](https://naturalresources.wales)

Designated Site	Designated Features	Allocations within thresholds		Impacts
	<ul style="list-style-type: none"> 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) North Atlantic wet heaths with <i>Erica tetralix</i> Blanket Bog Transition Mires and quaking bogs Alkaline fens <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> 1065 Marsh fritillary <i>Euphydryas aurinia</i> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> Southern damselfly <i>Coenagrion mercuriale</i> 	HSG/030/LDP/01 HSG/081/LDP2/1 HSG/060/LDP2/1 EMP/030/00001 EMP/030/LDP2/01		<p>Site is located near to minor roads, where traffic is not the key source of pollution 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. 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 117. 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"> 1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts 2130 Fixed dunes with herbaceous vegetation ("grey dunes") <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"> 4030 European dry heaths 6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) / Dry grasslands and scrublands on chalk or limestone. 8310 Caves not open to the public 8330 submerged or partially submerged sea caves <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> 1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> 1654 Early gentian <i>Gentianella anglica</i> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> 1395 Petalwort <i>Petalophyllum ralfsii</i> 	HSG/086/LDP2/1 HSG/086/LDP2/2 S/HSG/086/LDP2/3 HSG/086/LDP2/4 HSG/086/LDP2/5 HSG/086/LDP2/6 HSG/086/00222 HSG/086/LDP2/7 HSG/050/LDP2/1 HSG/096/LDP2/1 HSG/093/00066 HSG/096/00238 HSG/048/00038 HSG/135/LDP2/1 HSG/052/LDP2/1 HSG/003/LDP2/01 HSG/046/LDP2/1 S/EMP/000/00007 S/EMP/086/LDP/01 HSG/052/00011	SPV/066/LDP2/01 MXU/095/LDP2/01 EMP/093/00001 S/EMP/000/00003 S/EMP/000/00002 S/EMP/086/00003 S/EMP/096/00002 S/EMP/095/00001 S/EMP/096/00007 S/EMP/096/00004 S/EMP/096/00005 S/EMP/096/00006 S/EMP/000/00004 S/EMP/086/LDP2/01 S/EMP/096/00003 S/EMP/096/00001 CF/086/LDP2/1 GT/095/LDP2/1 GT/095/LDP2/2 EMP/146/00001 GT/003/LDP2/01 GT/095/LDP2/02	<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>Water quality</p> <p>The site is not hydrologically connected to any allocations. As such, no LSE is predicted.</p> <p>Recreation</p> <p>Eight residential allocations are located within 7km of the site with a minimum total of 390 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 936. 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>

Designated Site	Designated Features	Allocations within thresholds	Impacts
<p>North Pembrokeshire Woodlands SAC</p>	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> 91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles <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"> 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 <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> 1308 Barbastelle <i>Barbastella barbastellus</i> 	<p>S/HSG/034F/LDP2/1 HSG/053/LDP2/1 HSG/006/00003 EMP/034/00006 EMP/053/00001 S/EMP/136/00001 SPV/149/LDP2/01 S/EMP/034/LDP/02 S/EMP/034/00003 EMP/030/00001 EMP/030/LDP2/01 HSG/081/LDP2/1 HSG/030/LDP/01 HSG/122/00035 HSG/020/LDP2/1 MN/000/LDP2/001</p>	<p>Atmospheric Pollution A road runs through the site. Screened in for Northern Atlantic wet heaths only which are adjacent to the A487. No other qualifying features are present within 200m of the road.</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. According to the Office for National Statistics, the average household population is 2.4. As such, the total population increase is predicted to be 645.</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>
<p>Northwest Pembrokeshire Commons SAC</p>	<p>Annex I habitats that are a primary reason for selection of this site</p> <p>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"> 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) <p>Annex II species that are a primary reason for selection of this site</p> <p>1831 Floating water-plantain <i>Luronium natans</i></p>		<p>Atmospheric Pollution Designated features are not sensitive to atmospheric pollution. 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> <p>Recreation There are no residential allocations within 7km of the site.</p> <p>Functional linked land The Brawdy allocation and two residential allocations are the only allocations located within 10km of the site. The Brawdy site is already developed and being extended in areas already being used for other military purposes. The residential allocations are sufficiently away from the site that habitat loss is not anticipated.</p> <p>Disturbance No disturbance is anticipated as the site is sufficiently distant from any allocations.</p>
<p>Preseli SAC</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"> 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> 4030 European dry heaths 7150 Depressions on peat substrates of the <i>Rhynchosporion</i> 7230 Alkaline fens <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> 1044 Southern damselfly (<i>Coenagrion mercurial</i>) 1065 Marsh fritillary butterfly <i>Euphydryas</i> (<i>Eurodryas</i>, <i>Hypodryas</i>) <i>aurinia</i> 	<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 EMP/034/00006 S/EMP/136/00001 EMP/053/00001</p>	<p>Atmospheric Pollution Site is located near to minor roads, where traffic is not the key source of pollution</p> <p>Water Quality No LSE will arise from water quality as the site is spring fed and at a higher altitude than the allocations.</p> <p>Recreation Four residential allocations are located within 7km of the site with a minimum of 87 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 208. LSE is predicted.</p> <p>Functional linked land It is unclear where water is being supplied for the residential and employment allocations in Crymych. Abstraction of the spring water may alter water levels and</p>

Designated Site	Designated Features	Allocations within thresholds		Impacts
	<ul style="list-style-type: none"> 1393 Slender green feather-moss <i>Drepanocladus (Hamatocaulis) vernicosus</i> 	SPV/149/LDP2/01 EMP/030/00001 EMP/030/LDP2/01 MN/000/LDP2/001		degrade the habitat. Reducing its suitability for its designated species. LSE is predicted. Disturbance No disturbance is anticipated as the site is sufficiently distant from any allocations.
St David's SAC	Annex I habitats that are a primary reason for selection of this site <ul style="list-style-type: none"> 1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts 4030 European dry heaths Annex II species that are a primary reason for selection of this site <ul style="list-style-type: none"> 1831 Floating water-plantain <i>Luronium natans</i> 	S/HSG/034F/LDP2/1 HSG/119/LDP2/1 HSG/053/LDP2/1 EMP/034/00006 EMP/053/00001 S/EMP/034/LDP/02 S/EMP/034/00003 HSG/119/LDP2/1		Atmospheric pollution Site is not located within 200m of any roads Water Quality The site does not have any water-dependent features. Additionally, the site is not hydrologically connected to any allocations. As such, no LSE is predicted. Recreation There are four residential allocations located within 7km of the site with a minimum of 272 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 653. As such, LSE is predicted. Functionally Linked Land The Brawdy site is already developed and being extended in areas already being used for other military purposes. The residential allocations are sufficiently away from the site that habitat loss is not anticipated. LSE is not predicted. Disturbance (Noise and Vibration) The site is sufficiently distanced from the nearest proposed allocation such that there will be disturbance via noise or vibration. As such, no LSE is predicted.
Yerbeston Tops SAC	Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site <ul style="list-style-type: none"> 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) Annex II species that are a primary reason for selection of this site <ul style="list-style-type: none"> 1065 Marsh fritillary butterfly <i>Euphydryas (Eurodryas, Hypodryas) aurinia</i> 	HSG/113/LDP2/01 HSG/099/LDP2/1 HSG/132/LDP2/1 HSG/047/LDP2/1 HSG/063/00024 HSG/050/LDP2/1 HSG/096/LDP2/1 HSG/093/00066 HSG/043/LDP2/1 HSG/095/LDP2/4 HSG/095/00144 HSG/052/LDP2/1 HSG/123/LDP/01 HSG/003/LDP2/01	S/EMP/096/00007 S/EMP/096/00004 S/EMP/096/00005 S/EMP/096/00006 S/EMP/096/00001 SSA/089/01 SSA/089/LDP2/01 EMP/132/LDP2/01 EMP/088/LDP/01 EMP/000/LDP2/01 GT/003/LDP2/01 EMP/088/LDP/01 SSA/088/LDP2/01	Atmospheric pollution Site is adjacent to minor roads, not near to any allocations and where existing air quality is below CL. Water Quality The site is upstream of Milford Haven and allocations. As such, no LSE is predicted Recreation There are five residential allocations located within 7km of the site with a minimum of 104 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 249. As such, LSE is predicted. Functionally Linked Land As the marsh fritillary is highly mobile, it is possible that there will be LSE to this designated feature irrespective of the allocation location. As it is unclear where functional habitat for the designated species is located during the planning stage, the precautionary principle will be used to protect potential foraging and commuting habitats. As such, LSE is predicted for marsh fritillary. Disturbance (Noise and Vibration) The site is sufficiently distanced from the nearest proposed allocation such that there will be disturbance via noise or vibration. As such, no LSE is predicted.
Pembrokeshire Bat Sites and Bosherton Lakes SAC	Annex I habitats that are a primary reason for selection of this site	HSG/046/LDP2/1 HSG/047/LDP2/1 HSG/050/LDP2/1	S/HSG/040/LDP2/6 HSG/132/LDP2/1 S/EMP/040/00005	Atmospheric pollution Site is adjacent to minor roads, not near to any allocations and where existing air quality is below CL

Designated Site	Designated Features	Allocations within thresholds		Impacts
	<ul style="list-style-type: none"> 3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara spp.</i>/Calcium rich nutrient-poor lakes, lochs <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> 1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> 1303 Lesser Horseshoe Bat <i>Rhinolophus hipposideros</i> 1355 Otter <i>Lutra lutra</i> 	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 HSG/096/00238 HSG/096/LDP2/1 HSG/096/LDP2/2 HSG/099/LDP2/1 HSG/113/LDP2/01 HSG/123/LDP/01 HSG/086/LDP2/1 HSG/086/LDP2/2 S/HSG/086/LDP2/3 HSG/086/LDP2/4 HSG/086/LDP2/5 HSG/086/LDP2/6 HSG/086/00222 HSG/086/LDP2/7 HSG/043/LDP2/1 HSG/040/LDP2/3 HSG/040/LDP2/1 HSG/003/LDP2/1	MXU/040/01 S/EMP/040/00001 S/EMP/086/LDP/01 SPV/066/LDP2/01 EMP/000/LDP2/01 EMP/132/LDP2/01 MXU/095/LDP2/01 EMP/093/00001 S/EMP/000/00002 S/EMP/000/00007 S/EMP/086/00003 S/EMP/096/00002 S/EMP/095/00001 S/EMP/096/00007 S/EMP/096/00004 S/EMP/096/00005 S/EMP/096/00006 S/EMP/040/00011 S/EMP/040/00012 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 GT/003/LDP2/01 GT/095/LDP2/02 EMP/146/00001 SSA/088/LDP2/01 GT/040/LDP2/01	<p>Water Quality</p> <p>Stackpole SSSI is the only portion of the site with water related features. The site is not hydrologically connected to any allocations.</p> <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 21 residential allocations located within 7km of the site with a minimum of 829 units. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 1989. 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 disturbance via noise or vibration. As such, no LSE is predicted.</p>
Skomer Stokholm and Seas off Pembrokeshire SPA	<ul style="list-style-type: none"> European storm petrel <i>Hydrobates pelagicus</i> Annex I (breeding) Red-billed chough <i>Pyrrhocorax pyrrhocorax</i> Annex I (breeding) Short-eared owl <i>Asio flammeus</i> Annex I (breeding) Manx shearwater <i>Puffinus puffinus</i> regularly occurring migratory species (breeding) 	None		No allocations are located within 10km of the site. As such, no LSE is anticipated.

Designated Site	Designated Features	Allocations within thresholds	Impacts
	<ul style="list-style-type: none"> Atlantic puffin <i>Fratercula arctica</i> Regularly occurring migratory species (breeding) Lesser black-backed gull <i>Larus fuscus</i> Regularly occurring migratory species (breeding) 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 		
Grassholm SPA	<ul style="list-style-type: none"> Gannet <i>Morus bassanus</i> 	None	No allocations 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"> Red-billed chough <i>Pyrhcorax pyrrhcorax</i> Annex I (breeding) 	HSG/119/LDP2/1	<p>Atmospheric pollution Site is not located within 200m of any roads. No 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 is one residential allocation located within 7km of the site with a minimum of 18 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 43. 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>
Carmarthen Bay SPA.	<ul style="list-style-type: none"> Common Scoter <i>Melanitta nigra</i> (wintering) 	SSA/089/01 SSA/089/LDP/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	<p>Atmospheric Pollution Site is designated for marine habitats and species. There are no CLs for these features</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. According to the Office for National Statistics, the average household population is 2.4 individuals. As such, these residential allocations will result in a population increase of 283. 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>

Designated Site	Designated Features	Allocations within thresholds		Impacts
Castlemartin coast SPA	<ul style="list-style-type: none"> Red-billed chough <i>Pyrrhocorax pyrrhocorax</i> Annex I (breeding) 	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 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 HSG/048/00038 SPV/066/LDP2/01 MXU/095/LDP2/01 EMP/093/00001 S/EMP/000/00002 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	<p>Atmospheric Pollution Site is adjacent to minor roads, not near to any allocations and where existing air quality is below CL.</p> <p>Water Quality The site is not hydrologically connected to any allocations. As such, no LSE is predicted.</p> <p>Recreation There are 23 residential allocations located within 7km of the site with a minimum of 1081 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 2594. As such, LSE is predicted.</p> <p>Habitat Loss 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) There are no allocations inside the site boundary. As such, no LSE is predicted.</p>

10. Appendix C Allocation screening - list of allocations that lead to LSE - recreational impacts for terrestrial sites

Allocation	Screening Category	Screening Outcome	Allocation	Screening Category	Screening Outcome
HSG/003/LDP2/1	I	Screened In	HSG/086/LDP2/6	I	Screened In
HSG/006/00003	I	Screened In	HSG/086/LDP2/7	I	Screened In
HSG/020/LDP2/1	I	Screened In	HSG/088/LDP2/1	I	Screened In
HSG/022/LDP2/1	I	Screened In	HSG/093/00066	I	Screened In
HSG/029/00014	I	Screened In	HSG/095/00144	I	Screened In
HSG/029/LDP2/1	I	Screened In	HSG/095/LDP2/1	I	Screened In
HSG/030/LDP/01	I	Screened In	HSG/095/LDP2/2	I	Screened In
HSG/040/LDP2/1	I	Screened In	HSG/095/LDP2/4	I	Screened In
HSG/040/LDP2/3	I	Screened In	HSG/095/LDP2/5	I	Screened In
HSG/043/LDP2/1	I	Screened In	HSG/096/00238	I	Screened In
HSG/046/LDP2/1	I	Screened In	HSG/096/LDP2/1	I	Screened In
HSG/047/LDP2/1	I	Screened In	HSG/096/LDP2/2	I	Screened In
HSG/048/00038	I	Screened In	HSG/099/LDP2/1	I	Screened In
HSG/048/LDP2/1	I	Screened In	HSG/113/LDP2/01	I	Screened In
HSG/049/LDP2/1	I	Screened In	HSG/114/LDP/01	I	Screened In
HSG/050/LDP2/1	I	Screened In	HSG/119/LDP2/1	I	Screened In
HSG/052/00011	I	Screened In	HSG/120/00018	I	Screened In
HSG/052/LDP2/1	I	Screened In	HSG/122/00035	I	Screened In
HSG/053/LDP2/1	I	Screened In	HSG/123/LDP/01	I	Screened In
HSG/060/LDP2/1	I	Screened In	HSG/132/LDP2/1	I	Screened In
HSG/063/00024	I	Screened In	HSG/135/LDP2/1	I	Screened In
HSG/066/LDP2/1	I	Screened In	HSG/149/LDP2/1	I	Screened In
HSG/081/LDP2/1	I	Screened In	HSG/152/LDP2/1	I	Screened In
HSG/086/00222	I	Screened In	S/HSG/034F/LDP2/1	I	Screened In
HSG/086/LDP2/1	I	Screened In	S/HSG/040/LDP2/6	I	Screened In
HSG/086/LDP2/2	I	Screened In	S/HSG/086/LDP2/3	I	Screened In
HSG/086/LDP2/4	I	Screened In	GT/095/LDP2/1	I	Screened In
HSG/086/LDP2/5	I	Screened In	GT/095/LDP2/2	I	Screened in

11. Appendix D Recreation – Housing Allocations within 7km

Designated Site	Allocation	Number of units	Population Increase
Bristol Channel Approaches SAC	HSG/050/LDP2/1	19	46
	HSG/099/LDP2/1	11	26
	HSG/047/LDP2/1	8	19
	HSG/132/LDP2/1	14	34
	HSG/123/LDP/01	20	48
	HSG/052/LDP2/1	40	96
	HSG/052/00011	55	132
	HSG/095/00144	43	103
	HSG/095/LDP2/4	50	120
	HSG/096/00238	38	91
	HSG/095/LDP2/5	26	62
	HSG/095/LDP2/2	19	46
	HSG/095/LDP2/1	147	353
	HSG/046/LDP2/1	14	34
	HSG/003/LDP2/1	46	110
TOTAL	15	550	1320

Designated Site	Allocation	Number of units	Population Increase
West Wales Marine	HSG/086/LDP2/4	14	34
	HSG/086/LDP2/5	26	62
	HSG/086/LDP2/6	43	103
	HSG/086/00222	93	223
	HSG/135/LDP2/1	6	14
	HSG/119/LDP2/1	18	43
	S/HSG/034F/LDP2/1	175	420
	HSG/122/00035	28	67
	HSG/114/LDP/01	52	125
	HSG/049/LDP2/1	27	65
TOTAL	10	482	1156

Designated Site	Allocation	Number of units	Population Increase
Afon Teifi SAC	HSG/122/00035	28	67
	HSG/006/00003	6	14
	HSG/030/LDP/01	28	67
	HSG/020/LDP2/1	50	120
TOTAL	4	112	268

Designated Site	Allocation	Number of units	Population Increase
Carmarthen Bay SAC	HSG/132/LDP2/1	14	34
	HSG/047/LDP2/1	8	19
	HSG/050/LDP2/1	19	46
	HSG/099/LDP2/1	11	26
	HSG/123/LDP/01	20	48
	HSG/003/LDP2/1	46	110
TOTAL	6	118	283

Designated Site	Allocation	Number of units	Population Increase
Pembrokeshire Marine	HSG/029/00014	15	36
	HSG/029/LDP2/1	22	53
	HSG/040/LDP2/1	25	60
	HSG/040/LDP2/3	51	122
	HSG/043/LDP2/1	15	36
	HSG/046/LDP2/1	14	34
	HSG/047/LDP2/1	8	19
	HSG/048/00038	50	120
	HSG/048/LDP2/1	13	31
	HSG/052/00011	55	132
	HSG/052/LDP2/1	40	96
	HSG/063/00024	66	158
	HSG/066/LDP2/1	10	24
	HSG/086/00222	93	223
	HSG/086/LDP2/1	60	144
	HSG/086/LDP2/2	23	55
	HSG/086/LDP2/4	14	34
	HSG/086/LDP2/5	26	62
	HSG/086/LDP2/6	43	103
	HSG/086/LDP2/7	14	34
	HSG/093/00066	101	242
	HSG/095/00144	43	103
	HSG/095/LDP2/1	147	353
	HSG/095/LDP2/2	19	46
	HSG/095/LDP2/4	50	120
	HSG/095/LDP2/5	26	62
	HSG/096/00238	38	91
	HSG/096/LDP2/1	33	79
	HSG/096/LDP2/2	59	142
	HSG/099/LDP2/1	11	26
	HSG/113/LDP2/01	5	12
	HSG/119/LDP2/1	18	43
	HSG/123/LDP/01	20	48
	HSG/132/LDP2/1	14	34
	HSG/135/LDP2/1	6	14
	S/HSG/040/LDP2/6	330	792
	S/HSG/086/LDP2/3	117	281
	HSG/114/LDP/01	52	125
	HSG/049/LDP2/1	27	65
	HSG/088/LDP2/1	89	214
	HSG/003/LDP2/1	46	110
	HSG/022/LDP2/1	19	46
TOTAL	42	1927	4624

Designated Site	Allocation	Number of units	Population Increase
Cardigan Bay SAC	HSG/122/00035	28	67
	HSG/020/LDP2/1	50	120
TOTAL	2	78	187

Designated Site	Allocation	Number of units	Population Increase
Gweunydd Blaencleddau SAC	HSG/006/00003	6	14
	HSG/030/LDP/01	28	67
	HSG/081/LDP2/1	15	36
TOTAL	3	49	117

Designated Site	Allocation	Number of units	Population Increase
Limestone SAC	HSG/086/LDP2/1	60	144
	HSG/086/LDP2/2	23	55
	S/HSG/086/LDP2/3	117	281
	HSG/086/LDP2/4	14	34
	HSG/086/LDP2/5	26	62
	HSG/086/LDP2/6	43	103
	HSG/086/00222	93	223
	HSG/086/LDP2/7	14	34
TOTAL	8	390	936

Designated Site	Allocation	Number of units	Population Increase
North Pembrokeshire Woods SAC	S/HSG/034F/LDP2/1	175	420
	HSG/053/LDP2/1	38	91
	HSG/006/00003	6	14
	HSG/020/LDP2/1	50	120
TOTAL	4	269	645

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

Designated Site	Allocation	Number of units	Population Increase
Preseli SAC	HSG/053/LDP2/1	38	91
	HSG/081/LDP2/1	15	36
	HSG/030/LDP/01	28	67
	HSG/006/00003	6	14
TOTAL	4	87	208

Designated Site	Allocation	Number of units	Population Increase
St David's SAC	S/HSG/034F/LDP2/1	175	420
	HSG/119/LDP2/1	18	43
	HSG/114/LDP/01	52	125
	HSG/049/LDP2/1	27	65
TOTAL	4	272	653

Designated Site	Allocation	Number of units	Population Increase
Yerbeston Tops SAC	HSG/113/LDP2/01	5	12
	HSG/099/LDP2/1	11	26
	HSG/132/LDP2/1	14	34
	HSG/047/LDP2/1	8	19
	HSG/063/00024	66	158
TOTAL	5	104	249

Designated Site	Allocation	Number of units	Population Increase
Pembrokeshire Bat Sites and Bosherton Lakes	HSG/046/LDP2/1	14	34
	HSG/047/LDP2/1	8	19
	HSG/050/LDP2/1	19	46
	HSG/052/00011	55	132
	HSG/052/LDP2/1	40	96
	HSG/063/00024	66	158
	HSG/066/LDP2/1	10	24
	HSG/093/00066	101	242
	HSG/095/00144	43	103
	HSG/095/LDP2/1	147	353
	HSG/095/LDP2/2	19	46
	HSG/095/LDP2/4	50	120
	HSG/095/LDP2/5	26	62
	HSG/096/00238	38	91
	HSG/096/LDP2/1	33	79
	HSG/096/LDP2/2	59	142
	HSG/099/LDP2/1	11	26
	HSG/113/LDP2/01	5	12
	HSG/123/LDP/01	20	48
	HSG/003/LDP2/1	46	110
	HSG/022/LDP2/1	19	46
Total	21	829	1989

Designated Site	Allocation	Number of units	Population Increase
Castlemartin Coast SPA	HSG/086/LDP2/1	60	144
	HSG/096/LDP2/1	33	79
	HSG/095/00144	43	103
	HSG/095/LDP2/1	147	353
	HSG/046/LDP2/1	14	34
	HSG/096/LDP2/2	59	142
	HSG/086/LDP2/2	23	55
	S/HSG/086/LDP2/3	117	281
	HSG/086/LDP2/4	14	34
	HSG/086/LDP2/5	26	62
	HSG/066/LDP2/1	10	24
	HSG/095/LDP2/2	19	46
	HSG/086/LDP2/6	43	103
	HSG/093/00066	101	242
	HSG/095/LDP2/4	50	120
	HSG/095/LDP2/5	26	62
	HSG/052/LDP2/1	40	96
	HSG/096/00238	38	91
	HSG/086/00222	93	223
	HSG/086/LDP2/7	14	34
	HSG/052/00011	55	132
	HSG/135/LDP2/1	6	14
	HSG/048/00038	50	120
TOTAL	23	1081	2594

Designated Site	Allocation	Number of units	Population Increase
Ramsey and St David Peninsula Coast SPA	HSG/119/LDP2/1	18	43
TOTAL	1	18	43