

Pembrokeshire County Council

Local Development Plan 2 Deposit 2

Position Statement

Natural Resources Wales Condition Assessment for
Pembrokeshire Marine Special Area of Conservation (June 2025)

September 2025

Note Appendix 5 is a separate document

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Introduction

- I.1. The purpose of this Position Statement is to set out the implications of the recently published assessment of the Marine Protected Areas in Wales, which includes Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), on the 25 June 2025 by Natural Resources Wales for the Pembrokeshire Local Development Plan 2.
- I.2. The Council has reviewed the contents of the revised guidance and condition surveys relevant to the plan area and this paper sets out in response:
 - a. changes proposed to the Local Development Plan (i.e., to the wording of relevant policies of the Plan and to where the policy which deals with water quality is placed in the Plan. These recommended changes can be considered as Matters Arising Changes through the Examination process.
 - b. how the Habitats Regulations Assessment of the Plan should be updated with this Position Statement as an Addendum.
 - c. an outline of the proposed mitigation package the Council is commissioning consultants to undertake, along with an outline of the proposed timetable for its completion.

1. Describe the issue

- 1.1. Natural Resources Wales (NRW) has published new evidence in June 2025 which contributes to Welsh Government's Nature Networks Programme to improve the condition, connectivity and resilience of protected sites.
- 1.2. Links to the various Condition Assessments for Welsh European marine sites and the associated Conservation Advice Packages can be found in the footer below¹. These have been put in place to help Wales meet the obligations of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations)². They have significant implications for land use planning in affected areas.
- 1.3. In a Pembrokeshire context, the condition of the Pembrokeshire Marine SAC has been found to be unfavourable and there is a high degree of confidence in the monitoring work undertaken here – hence this is one of the Marine SACs being prioritised for remedial actions, **although further technical work is needed to better understand the nature of the problem**.
- 1.4. Currently, NRW is not advising that nutrient neutrality should be applied as a blanket approach across the marine SACs in Wales. However, it is asking for nutrient neutrality (for nitrogen) in some of the Water Framework Directive sub-catchments, including the **Milford Haven Inner sub-catchment** and areas draining into this, which include the upstream freshwater SAC catchment of the Western and Eastern Cleddau.
- 1.5. NRW's advice on this matter (taken from their website and dated 6th August 2025) is reproduced below:

‘(NRW) Marine SAC interim advice

Our marine SACs have a number of ecological features designated for environmental protection including estuaries, coastal lagoons, large shallow inlets and bays and mudflats/sandflats that are sensitive to high levels of nutrients.

*We released **condition assessments** and **conservation advice** for our marine SACs in June 2025.*

The updated condition assessments have concluded that nutrient sensitive features at some sites are in unfavourable condition for both chemical (Dissolved Inorganic Nitrogen [DIN]) and biological (phytoplankton and

¹ <https://www.naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/condition-assessments-for-welsh-european-marine-sites-ems/?lang=en> - see in particular conditions assessments and conservation advice for Pembrokeshire Marine SAC, Cardigan Bay SAC, Carmarthen Bay SAC, Grassholm SPA, Carmarthen Bay SPA, Cardigan SPA <https://www.naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/condition-assessments-for-welsh-european-marine-sites-ems/?lang=en> <https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/conservation-advice-for-european-marine-sites/?lang=en>

² <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

opportunistic macroalgae) indicators of nitrogen enrichment. High concentrations of nitrogen in the water column at these features can cause phytoplankton and opportunistic macroalgae blooms leading to adverse ecological effects. These effects include reduced dissolved oxygen availability, especially in warmer months, and lethal and sub-lethal impacts on sensitive fish, epifauna and infauna communities.

Water bodies in marine SACs where features are in unfavourable condition due to current evidence of both chemical and biological failure are:

- **Milford Haven Inner (Pembrokeshire Marine SAC)**
- **Burry Inlet Inner (Carmarthen Bay and Estuaries SAC)**
- **Cemlyn Lagoon (Cemlyn Bay SAC)**

Further technical work to understand the nutrient impacts and ongoing environmental monitoring and assessment of chemical and biological failures geographically will help to inform any future revisions to the planning advice.

New developments leading to an increase in nitrogen discharges directly to, or catchments draining to these sites may contribute to unfavourable condition of, or undermine measures to restore, these features. NRW advice is that: **We therefore advise Planning Authorities that a conclusion of no adverse effect on site integrity may be drawn in a Habitats Regulations Assessment, where any plans or projects in these areas with the potential to increase nutrient discharges can secure appropriate mitigation³ and demonstrate nutrient neutrality⁴ for nitrogen.**

Planning Authorities may apply the screening principles set out in our SAC Rivers planning advice for types of development unlikely to increase nutrient discharges and advice on agricultural developments, domestic extensions, private treatment systems, separator toilets and permitted development.

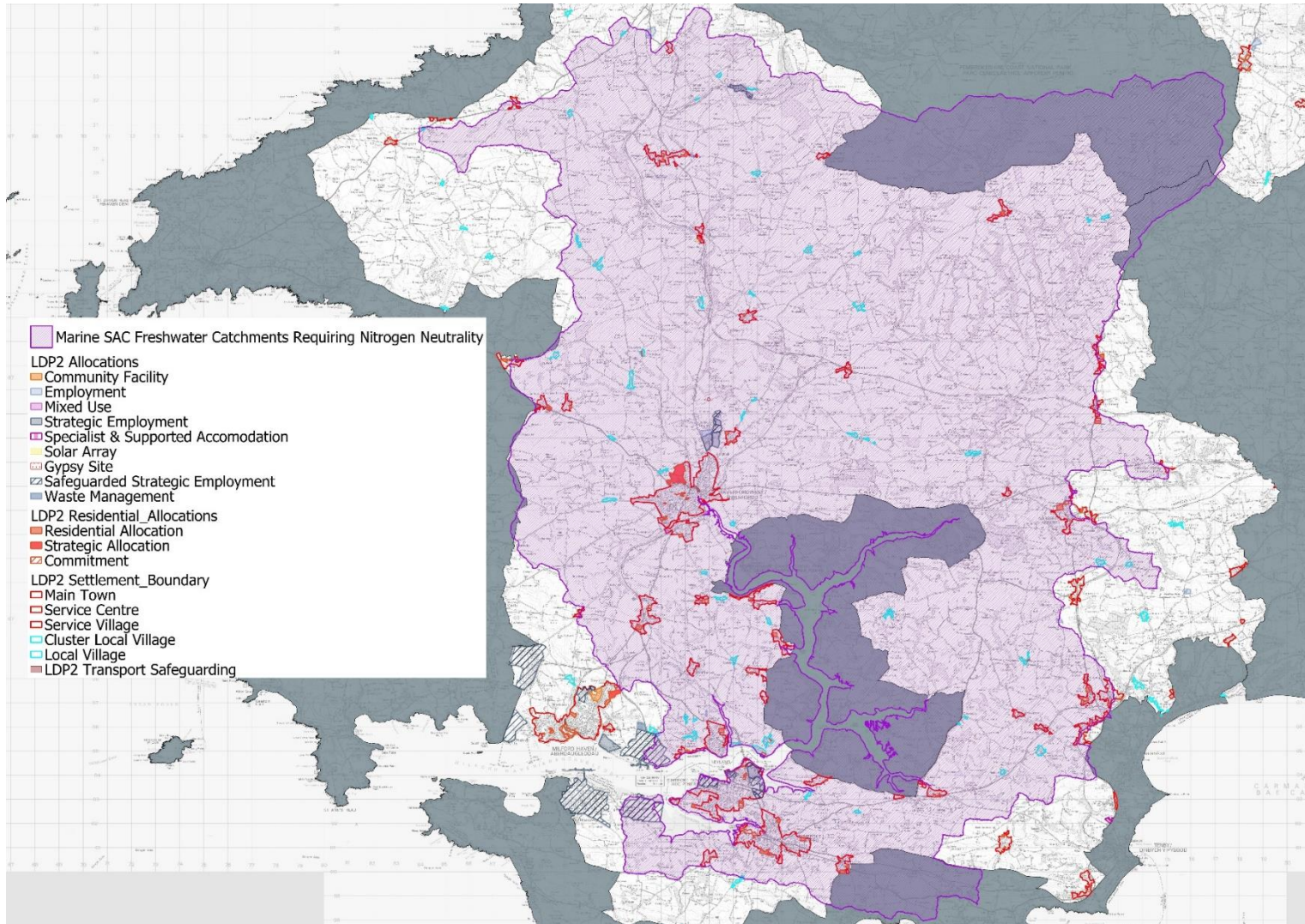
Where the intention is for a proposed development to connect to a sewer network that is located close to the boundary of the freshwater catchments for the **Milford Haven Inner**, **Burry Inlet Inner**, and **Cemlyn Lagoon**, the location of wastewater treatment outfall should be confirmed to determine if there is a hydrological pathway for nutrient discharges to the failing marine water body. (Last updated 6 Aug 2025)

³ Source: <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/principles-of-nutrient-neutrality-in-relation-to-development-or-water-discharge-permit-proposals/?lang=en>

⁴ What is nutrient neutrality? Nutrient neutrality is an approach for managing new development and water discharge permit proposals to prevent them from causing any net increase in nutrients for the duration of the authorisation. Nutrient neutrality is applicable in Wales to developments with phosphorus discharges into Special Areas of Conservation (SAC) rivers. Source: <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/principles-of-nutrient-neutrality-in-relation-to-development-or-water-discharge-permit-proposals/?lang=en>

- 1.6. Pembrokeshire County Council (PCC) is in discussion with NRW, Planning Environment Decisions Wales (PEDW) and the joint Nutrient Management Board for West Wales (NMB) to assess the implications for planning. NRW will provide supporting advice on screening and assessing plans and projects in the affected areas. It wishes to ensure that decision-making is consistent, precautionary and defensible. The interim advice to local planning authorities (LPAs) is set out above, with further advice expected on planning implications in the future.
- 1.7. In the Marine Special Areas of Conservation (SAC), a major concern is the levels of Dissolved Inorganic Nitrogen in its various forms. Hence, the focus is likely to be on reducing nitrates, nitrites, ammonia and organic nitrogen in these areas. Diffuse sources (agricultural run-off, pollution incidents and private non-treated sewage) are thought to be largely responsible for this issue.
- 1.8. NRW is developing a programme of work (no firm timescales have been provided) to tackle these issues, like that already put in place for the Riverine SACs. Advice and guidance will thus follow, together with the exploration of longer term / catchment scale approaches. In the meantime, Authorities must consider the nutrient neutrality route.
- 1.9. In terms of geographical affect the map below shows the extent of the area where nutrient neutrality for nitrogen is required.

Figure 1 Map of affected area



- 1.10. The extent of the affected areas shown must be treated with some caution, as the mapping may not reflect the complexities of hydrological connections / drainage pathways. There will be instances where drainage pathways take affected flows outside the catchment area and others where locations outside the catchment have drainage pathways into it. In some locations close to the edge of the affected areas, further local investigations will be needed to establish the nature of the drainage pathways and hence whether a development proposal is affected by nutrient neutrality requirements or otherwise. However, in most cases the situation will be clear from the outset.
- 1.11. An investigative report prepared by Natural Resources Wales in March 2021 ‘WFD TraC Nutrient Failures Investigation Report: Milford Haven Inner Transitional Waterbody’ in response to the Milford Haven Inner transitional waterbody failing its WFD objectives for Dissolved Inorganic Nitrogen (DIN) and Opportunistic Macroalgae elements in Cycle 2 (2015) and Cycle 3 (2021) advised:

‘that there is evidence that the ‘major’ input of DIN into the Milford Haven Inner waterbody is confirmed from diffuse sources associated with farm infrastructure and probable from losses from agricultural land. Further investigation is required to provide a more detailed breakdown of DIN sources from agricultural practices and the specific inputs into the catchment which are causing the waterbody to fail/not achieve good status. Improved land management practices are needed in the catchment to reduce the DIN inputs to the waterbody.

Point source sewage treatment works are confirmed as a ‘minor’ source for DIN failure but a ‘major’ source for Opportunistic Macroalgae. Intermittent sewage discharge has been identified as a probable source and unsewered domestic sewage a suspected source but these are ‘unknown’ contributions and need further investigation locally to confirm them.’⁵

“Haines & Edwards (2016) reported that STW effluents discharging directly into the waterway account for 5% of the DIN load to the waterway. EPR (Environmental Permitting Regulation) installation discharges account for no more than 2% of the total DIN load. Losses from agricultural land were almost certainly the dominant source of DIN, estimated at 92% of the total DIN load, but further source apportionment work was required to confirm this and to give a more detailed breakdown of DIN sources. The report concluded that agricultural and rural land use management practices were likely to be the primary source of diffuse pollutants.

⁵ WFD TraC Nutrient Failures Investigation Report: Milford Haven Inner Transitional Waterbody Natural Resources Wales March 2021, page 4.

Caprez, S. (2020) reported that the contribution of DIN from each STW is relatively minor, not rising above 2% for any individual STW or 3.8% when viewed together.”⁶

⁶ WFD TraC Nutrient Failures Investigation Report: Milford Haven Inner Transitional Waterbody Natural Resources Wales March 2021, page 26.

2. Legal Implications

- 2.1. Under the Conservation of Habitats and Species Regulations 2017 ('the Habitat Regulations'), there are significant responsibilities conferred on the Council as a 'competent authority'. **Primarily, it requires the Council to only approve plans or projects (such as planning applications or a Local Development Plan) if there is no likelihood of a significant effect on internationally protected ecological sites.**
- 2.2. A significant effect could be caused by a number of potential impacts including direct or indirect habitat loss, air pollution, water pollution, or an increase in recreation. In order to assess whether there is a 'likely significant effect' a Habitats Regulations Assessment (HRA) is carried out. This generally includes an Appropriate Assessment (AA), which is the second more detailed stage 4 of an HRA - see Figure 2 Habitats Regulations Stages. Natural Resources Wales must be consulted on the findings of an HRA and there is a duty to consider their response. An established principle under law is that appropriate assessments must use the 'precautionary principle'. This means that evidence must demonstrably show that there would not be a likely significant effect on the protected sites before planning permission could be granted or a local plan approved. If there is uncertainty or a lack of information, the planning application or plan should be refused. It is also necessary to consider not only the impact of a single plan or project in isolation but where there is any likelihood of a significant effect in combination with other plans and projects.
- 2.3. **It is also important to note that this is a legal requirement as opposed to a material planning consideration.** Material planning considerations form part of a planning balance and permission can potentially be granted for something which causes harm if the benefits outweigh that harm. This is not the case here and it must be shown that there would not be a likely significant effect in order for the Council to lawfully grant planning permission or approve a local development plan. Failure to do this could result in the permission being subject to legal challenge.
- 2.4. The Habitats Regulations transpose two EU Directives: The Habitats Directive and The Birds Directive. As such, the processes and legal requirements effectively cannot be changed at this time. Government has exited the EU, and the regulations have remained effectively the same.
- 2.5. It is important to distinguish between the general duty under Article 6(2) and the project-specific assessment process under Article 6(3) of the Habitats Regulations. Article 6(2) imposes a continuous obligation on Pembrokeshire County Council, as a Competent Authority, to avoid deterioration and disturbance of European sites, regardless of whether a specific plan or project is proposed. This duty is proactive and applies to all activities that may affect site integrity.
- 2.6. In contrast, Article 6(3) applies when a plan or project is likely to have a significant effect and required an appropriate assessment. Any mitigation proposed under Article 6(3) must be additional to the protections already

required under Article 6(2). This principle of additionality is supported by guidance from Natural Resources Wales, which state that mitigation measures must be preventative and effective at the time of assessment, and must not substitute for measures required to meet existing conservation objectives. Therefore, mitigation under Article 6(3) must supplement, not replace, the Competent Authorities ongoing responsibilities under Article 6(2).

- 2.7. The European Court of Justice recently determined a case related to considering water quality in Appropriate Assessments. This is generally referred to as 'The Dutch Case' and the judgement refines the definition of plans and projects and effectively includes significantly more operations within the definition which have an impact on water quality, most notably runoff from agriculture.
- 2.8. **The consequences of non-compliance:** The legal obligations under the Habitats Regulations are stringent, and the consequences of getting it wrong are serious. Planning permissions granted in breach of these rules are vulnerable to judicial review and quashing orders. Developers may face costly delays, reputational damage, and in some cases, requirements to cease works or carry out retrospective mitigation.
- 2.9. Furthermore, LPAs are under statutory duties to comply with the Habitats Regulations. Officers who recommend approval without a compliant HRA may expose the authority to litigation, and in some cases, professional liability. In practice, this has led to extremely cautious decision-making, with many councils refusing to register applications unless nutrient neutrality evidence is provided upfront.

3. Implications for Local Development Plan 2

There are obvious implications from NRW's announcement for housing proposals in the affected area shown in Figure 1 Map of affected area

3.1.

3.2. There are also potential implications for other forms of development in the Plan area.

3.3. In terms of screening in likely developments NRW advise⁷ (with the caveat that every development should be considered by Planning Authorities on a case-by-case basis) that **where non-residential development leads to increases in nutrient discharges** there are implications. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, **self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites**. There may be cases where planning applications for **new commercial or industrial developments, such as conference facilities, large retail sites or major tourist attractions** could result in the release of additional nutrients into the river system. In such cases, further assessment is likely to be required to determine if the proposal will have an adverse effect on the integrity of the river or Marine SAC.

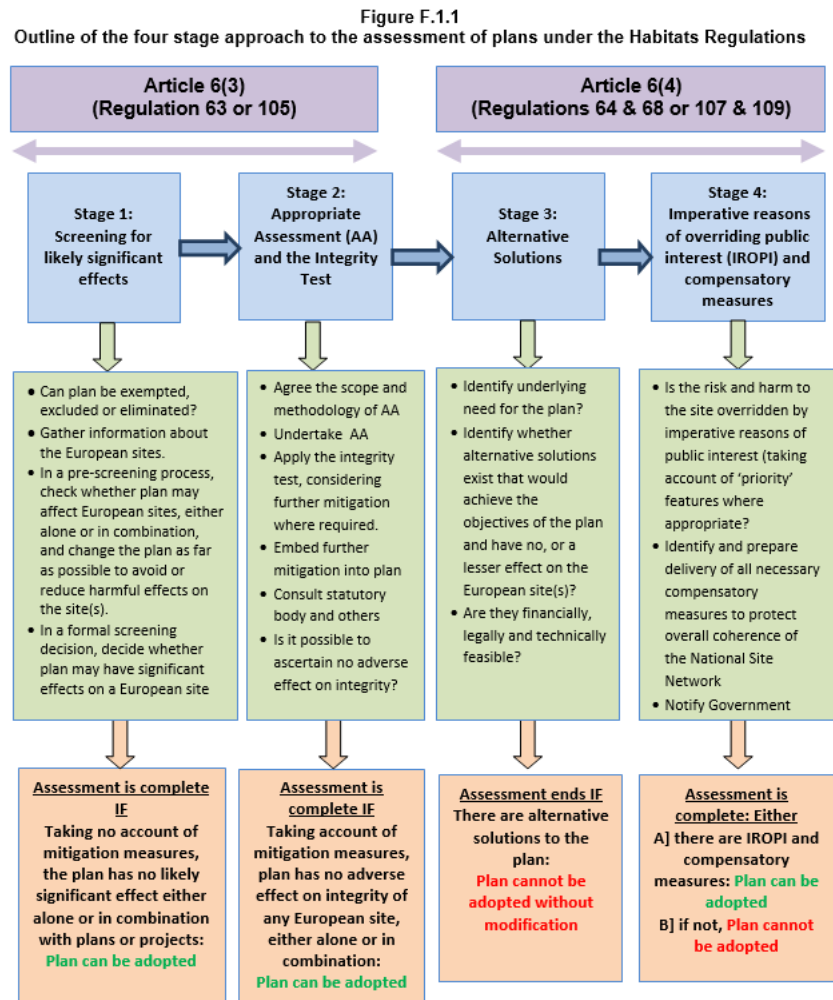
3.4. NRW advise that the following developments (which are relevant for the Plan's policy approach) can be screened out as not likely to have a significant effect on a river SAC in relation to nutrient inputs, as there is unlikely to be a source of additional nutrients or pathway for impacts:

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

⁷ Version 5 of this advice published 06/08/2025. <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-special-areas-of-conservation/?lang=en>

3.5. The Plan's policies selected for further consideration are set out in the next chapters following the Habitats Regulations Assessment approach.

Figure 2 Habitats Regulations Stages



4. Stage 1: Screening the Plan

To assess the implications of the NRW announcement regarding the Conditions Assessment for the Pembrokeshire Marine SAC Figure 1 Map of affected area

4.1. shows the extent of the Plan area affected by the announcement.

4.2. This assessment adopts the approach set out in Part F of the Habitats Regulations Assessment Handbook 'Practical Guidance for the Assessment of Plans'.⁸ Section F.6.3 introduces 'screening categories' against which each policy within a plan should be assessed. The screening categories are shown in the table below.

Table 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	Check for in-combination

⁸ <https://www.dtapublications.co.uk/handbooks>

Category	Description	Screening Outcome
	need to check for likely significant effects in combination.	effects and re-categorised as K or L
K	Policy or proposal not likely to have significant effect either alone or in combination.	Screen out after in-combination test
L	Policy or proposal likely to have a significant effect in combination	Screen in after in-combination test
M	Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site	Screened in

4.3. Those Plan elements that cannot have any effects on European sites can then be screened out early on (categories A to H), leaving those that have some possibility of effect (category I to L) to proceed to the final stage of screening.

No likely Significant Effect Predicted – Vision, Objectives

- 4.4. The Plan's introductory chapters, vision and objectives can be screened out as seen in Appendix 1 Screening.
- 4.5. The following policies are not expected to result in likely significant effects in terms of increasing nutrient waste in the affected area.

Table 2 No 'Likely Significant Effect' Predicted – Strategic Policies

Policy Reference	Screening Category	Notes	Screen In
SP 01: 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. Other more detailed policies can be found in the Plan.	No
SP 02: Housing requirement	A	Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. The housing allocations are screened separately under policy GN 16.	No
SP 03: Affordable housing Target	A	Screened out: This policy sets out a general policy statement. It is not spatially specific but could theoretically be relevant to proposals which might impact upon European sites. However, given that the strategic nature of the policy, the credible evidence of a real risk to European sites is	No

Policy Reference	Screening Category	Notes	Screen In
		low. It is considered that Policy SP 12, Policy GN 41 and Policy GN 47 will provide sufficient protection to avoid proposals coming forward which represent a risk to European sites. In view of Policy SP 12, Policy GN 41 and Policy GN 47 SP03 will have no conceivable effect on any European sites.	
SP 05: Supporting Prosperity	A	Screened out: This policy sets out a general policy statement. It is not spatially specific but could theoretically be relevant to proposals which might impact upon European sites. However, given that the strategic nature of the policy, the credible evidence of a real risk to European sites is low. It is considered that Policy SP 12, Policy GN 41 and Policy GN 47 will provide sufficient protection to avoid proposals coming forward which represent a risk to European sites. In view of Policy SP 12, Policy GN 41 and Policy GN 47 SP 5 will have no conceivable effect on any European sites.	No
SP 06: 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.	No
SP 07: 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.	No
SP 08: Regional Growth Areas	A	Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. In view of policy GN 41 and GN 47, policy SP 8 cannot undermine the conservation objectives of any European sites.	No
SP 09: Service Centres and Service Villages	A	Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. In view of policy GN 41 and GN 47, policy SP 9 cannot undermine the conservation objectives of any European sites.	No

Policy Reference	Screening Category	Notes	Screen In
SP 10: Local Villages	A	Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. In view of policy GN 41 and GN 47, policy SP 10 cannot undermine the conservation objectives of any European sites.	No
SP 13: Port and energy-related Development and Celtic Freeport	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 4.80, provides further advice on Habitats Regulations Assessment being required. Hence working alongside Policy GN 41 and GN 47, in particular, this policy provides sufficient protection. In view of policy GN 41 and GN 47, policy SP 13 cannot undermine the conservation objectives of any European sites. The reasoned justification specifically refers to 'no increase in nutrients in the Pembrokeshire Marine SAC'.	No
SP 16: Retail Hierarchy	F	Screened out: The policy is a strategic high-level policy setting out land use priorities with reference to later policies within the plan (see paragraph 4.101). 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.	No
SP 17: Visitor Economy	F	Screened out: The policy is a strategic high-level policy setting out land use priorities with reference to later policies within the plan (see paragraph 4.112). 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.	No
SP 18: 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.	No
SP 19: Welsh Language	G	Screened Out: Policy does not impact upon conservation objectives of designated Sites	No
SP 20: Transport Infrastructure and Accessibility	F	Screened Out: not likely to have a significant effect on an SAC in relation to nutrient inputs, as there is unlikely to be a source of additional nutrients or pathway for impacts. Safeguarded routes which are referred to in Policy GN 36 are considered separately.	No

Policy Reference	Screening Category	Notes	Screen In
SP 21 Waste Prevention and Management	F	Screened out: This policy is a high-level policy setting out land use priorities which will be used with reference to later policies in the Plan as well as national planning policies. The policy in itself cannot lead to development.	No

Table 3 No 'Likely Significant Effect' Predicted – General Policies

Policy	Screening Category	Screening conclusion	Screen In
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. Reasoned justification is detailed in requirements as well.	No
GN 5 Renewable Energy – target and allocations The policy consists of 2 parts: Part 1: sets out the target per annum for renewable energy generation. Part 2: allocates two sites for solar arrays.	B	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 – see Table 40.	No
GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)	H	Screened out: where development does not lead to nutrient discharges screen out. Wind energy	No
GN 7 Cawdor Barracks including the former Brawdy Airfield	G	Screened out: Site lies outside the catchment area.	No
GN 9 Employment Allocations		This policy identifies employment site allocations which are considered in see Table 40.	–
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.	A	Part 1 Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. In view of policy GN 41 and GN 47, policy GN 10 cannot undermine the conservation objectives of any European sites. For Part 2 This policy identifies mixed use allocations which are considered in Table 40.	No

Policy	Screening Category	Screening conclusion	Screen In
GN 11 Protection of Employment Sites and Buildings	B/F	Screened out: Policies listing general criteria for testing the acceptability/sustainability of proposals. Will be dependent on other policies of the Plan as well.	No
GN 15 – Housing Mix, Space standards and requirements for Lifetime Home Standards	B	Screened out: policy listing criteria for testing the acceptability of proposals. Will be dependent on other policies of the Plan	No
GN 16 – Residential Allocations		This policy identifies residential allocations which are considered further below in Table 38.	-
GN 17 Residential Commitments	-	This policy identifies residential commitments which are screened under Table 39.	—
GN 18 Slade Lane, Haverfordwest	-	This policy identifies a residential allocation which is screened under Table 38.	—
GN 19a Maesgwynne, Fishguard	-	This policy identifies a residential allocation which is screened under Table 38.	—
GN 19b South of Conway Drive, Castle Pill Road, Steynton –	-	This policy identifies a residential allocation which is screened under Table 38.	—
GN 20 – Local Needs Affordable Housing	F	Screened out: policy listing general criteria. Can only be used in conjunction with other policies that allow for development to take place and these have been screened in.	No
GN 23 – Specialist and Supported Accommodation Allocations	-	This policy identifies specialist and supported allocations which are considered in further detail in Table 40.	—
GN 24 Gypsy and Traveller Site Allocations	-	This policy identifies allocations which are considered in further detail in Table 40.	—
GN 26 – Telecommunications and Digital Technology Infrastructure	B	Screened out: policy listing general criteria and applies Plan wide. Proposals will not include the generation of wastewater.	No
GN 27 Broadband and Telecommunications on New Developments	B	Screened out: policy listing criteria for testing the acceptability of proposals. Proposals will not include	No

Policy	Screening Category	Screening conclusion	Screen In
		the generation of wastewater	
GN 28 – Protection and Enhancement of the Historic Environment	D	Environmental protection/site safeguarding policy	No
GN 30 – Community Facility Allocations	-	This policy identifies allocations which are considered in further detail in Table 40 below.	–
GN 40 – Buffer Zones around Mineral Sites	A	Screened out as policy does not lead to development.	No
GN 41 Protection of National Statutory Environmental Designations	M	Screened in: DTA Handbook - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12	No
GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits	D	Screened out Environmental protection/site safeguarding policy	No
GN 43 Protection of Trees, Woodlands and Hedgerows	D	Screened out Environmental protection/site safeguarding policy	No
GN 44 Protection and Enhancement of Biodiversity	D/E	Screened out Environmental protection/site safeguarding policy	No
GN 45 – Green Infrastructure	A/B	Screened out: general statement of policy/general aspiration and listing general criteria.	No
GN 46 – Coastal Change - policy proposed for deletion Focussed Changes	-	This Policy is proposed for deletion through the Focussed Changes consultation (ref).	No
GN 48 – Green Wedges	D	Screened out: plan wide safeguarding of settlements.	No
GN 49 – Landscape	D	Screened out: plan wide safeguarding of landscape.	No
GN 50 - Policy deleted in the Deposit Plan.	–	Policy deleted in the Deposit Plan	No
GN 51 – Protection and Creation of Outdoor Recreation Areas	B	Screened out: Policies listing general criteria for testing the acceptability of a proposal.	No
GN 52 – Protection of Open Spaces with Amenity Value	B	Screened out: Policies listing general criteria for testing the acceptability of a proposal.	No

4.6. The following allocations are not expected to result in likely significant effects in terms of increasing nutrient waste in the affected area.

Table 4 No 'Likely Significant Effect' Predicted – Housing Allocations

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/006/00003	No	Adjacent to Hafod	Blaenffos	West Wales Marine (Nyfer)	No
HSG/020/LDP2/1	No	Land at Tan Ffynnon Fields	Cilgerran	Cardigan Bay (Teifi) (Also West Wales Marine)	No
HSG/030/LDP/01	No	East of Waunaeron	Crymych	West Wales Marine (Nyfer)	No
HSG/086/00222	No	Southwest of The Meads	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/1	No	Land at Myrtle Meadows, Steynton	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/2	No	East of Castle Pill Road Steynton	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/4	No	Former Hakin Infants' School	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/5	No	Former Hubberston VC School, Hakin	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/6	No	Former Hakin Junior School	Milford Haven	Pembrokeshire Marine - outer	No
HSG/099/LDP2/1	No	Land at Coppins Park	Pentlepoir	Cardigan Bay and Estuaries -via storm overflow into Saundersfoot Stream and pumped to Tenby and just outside Carmarthen Bay in Bristol Channel Approaches SAC.	No
HSG/114/LDP/01	No	East of Pilgrim's Way	Roch	Pembrokeshire Marine and West Wales Marine SAC.	No
HSG/122/00035	No	Awel y Mor extension	St Dogmaels	Cardigan Bay (Teifi) (Also West Wales Marine) - foul flows are pumped to Cardigan WwTW in Ceredigion - and to note that this works is being upgraded by the water company and that there is an embargo on occupation of new residential development until this work is completed (expected to be in 2027).	No

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/123/LDP/01	No	North of Parsons Green	St Florence	Bristol Channel Approaches sac via Ritec - just outside Carmarthen Bay and Estuaries SAC.	No
HSG/132/LDP2/1	No	West of Kings Park Farm	Templeton	Carmarthen Bay and Estuaries SAC.	No
S/HSG/034F/LDP2/1	No	Maesgwynne	Fishguard	West Wales Marine (direct)	No
S/HSG/086/LDP2/3	No	South of Conway Drive, Castle Pill Road, Steynton	Milford Haven	Pembrokeshire Marine - outer	No

4.7. The following sites with planning permission for housing under Policy GN 17 Residential Commitments have been reviewed as a desktop exercise and are considered from the evidence available to have reached a stage in their implementation where there is not an opportunity to consider screening for HRA. Those that are outside the catchment area in the first instance are also excluded.

Table 5 ‘No Likely Significant Effect’ Predicted – Policy GN 17 Housing Commitments Category G Screening

Allocation Name	LDP Reference	Site Total	Units under construction	Commitment Units Remaining in plan period (NS only)	Conclusion	Screen In Unit No.
Scarrowscant	040/00431	181	9	0	Out	0
141 Portfield	040/00397	20	0	20	Out	0
Kensington Garden/Area of land behind City Rd	040/00077	133	3	2	Out	0
Brooklands Park	040/00106	21	0	18	Out	0
7 Dew Street	040/00445	5	0	5	Out	0
Beaconing Drive, Steynton	086/00129	81	2	28	Out	0
Thornton Rd	086/00223	10	10	0	Out	0
Land at Milford Marina	086/00377	190	0	45	Out	0
132 Robert Street	086/00378	8	0	8	Out	0
72-78 Charles Street	086/00381	15	0	15	Out	0
Woodlands View	086/00282	7	0	4	Out	0
Imble Lane	096/00373	100	30	70	Out	0
Hampshire Drive	096/00230	6	2	4	Out	0

Allocation Name	LDP Reference	Site Total	Units under construction	Commitment Units Remaining in plan period (NS only)	Conclusion	Screen In Unit No.
Land adjacent to Long Mains and Monkton Priory	095/00147	208	0	70	Out	0
West of Clos-Y-Bigney	034/00165	50	0	50	Out	0
Maesgwynne Farm Complex	034/00165	5	1	2	Out	0
Delfryn, Heol Penlan, Stop & Call	034/00099	9	0	5	Out	0
Main Street	034/00292	26	0	26	Out	0
Old Narberth CP School	088/00360	11	0	8	Out	0
Between the school and station road	030/00043	56	0	56	Out	0
Crug yr Efydd	030/00019	26	2	5	Out	0
Pond Bridge Farm	048/00017	123	14	40	Out	0
Land to rear of Newton Hall	050/00043	19	0	19	Out	0
Parc Maen Hir	053/00034	26	0	26	Out	0
Phase 2, Court Meadow	053/00009	27	0	27	Out	0
Former Go Cart Track	053/00052	23	2	11	Out	0
Old Station Yard	007/00047	30	0	20	Out	0
Barley Park Close	003/00025	26	3	17	Out	0
North of the Forge	028/00012	22	0	22	Out	22
South West of Eglwysrw School	033/00035	23	23	0	Out	0
Will Meadows	035/00030	28	2	11	Out	0
Poplar Meadow	035/00021	7	1	0	Out	0
North of Cartref	042/00013	15	0	8	Out	0
Bowett Close	046/00015	29	0	5	Out	0
Ger Y Lein Fach	081/LDP/01	13	0	2	Out	0
Parc Yr Odyn	085/00022	7	1	4	Out	0
Sycamore Close	099/00045	6	0	3	Out	0
Cornfields Walk	015/00024	100	30	0	Out	0
East of Hill Lane	119/LDP/01	20	0	20	Out	0
Old Smithy Craft Centre	119/00028	4	4	0	Out	0
Pembrokeshire Motor Museum	119/00030	26	0	13	Out	0
Ash Grove Gardens	123/00045	11	2	3	Out	0

Allocation Name	LDP Reference	Site Total	Units under construction	Commitment Units Remaining in plan period (NS only)	Conclusion	Screen In Unit No.
Land adj Blaenffynnon Farm	131/00021	30	1	13	Out	0
Maes Elwyn John	110/00015	7	1	1	Out	0
St Twynnell's Farm	125/00009	5	2	0	Out	0
Bluebell Lane	000/01202	7	1	0	Out	0

- 4.8. It is recognised that further investigation may be necessary to provide a definitive view and the table may not be an entirely faithful reflection of the ongoing circumstances surrounding a site. Officers have used a precautionary approach in terms of screening out sites. The purpose of this exercise is not to provide a definitive view for screening future applications on these sites but to scope out the likely extent of the housing land supply potentially impacted by nutrient neutrality for nitrogen.

Table 6 No ‘Likely Significant Effect’ Predicted – Other Allocations – Category G Screening
(Policy GN 05, GN 09, GN 10, GN 23, GN 24, GN 30, GN 59, SP 14, SP 15)

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
GN 09	EMP/030/00001	Employment	Parc Gwynfryn	Crymych	West Wales Marine (Nyfer)	
GN 09	EMP/000/LDP2/01	Employment	Land at Princes Gate Spring Water	Ludchurch	No public sewerage Carmarthen Bay and Estuaries (via riverine Taf)	
GN 09	EMP/030/LDP2/01	Employment	South of Parc Gwynfryn	Crymych	West Wales Marine (Nyfer)	
GN 10	MXU/040/01	Mixed Use	Haverfordwest-Old Hakin Road	Haverfordwest	Pembrokeshire Marine - directly (Cleddau)	All conditions discharged
GN 23	SSA/089/01	Supported Accommodation	Southwest of Park House, Tenby	New Hedges	Carmarthen Bay and Estuaries (outfall adjacent to SAC)	
GN 23	SSA/089/LDP2/01	Supported Accommodation	East of Park House, Tenby	New Hedges	Carmarthen Bay and Estuaries (outfall adjacent to SAC)	
GN 24	GT/095/LDP2/1	Gypsy Site	Castle Quarry eastern extension	Pembroke	Pembrokeshire Marine - directly (Cleddau)	Focussed Changes - site proposed for deletion
GN 30	CF/086/LDP2/1	Community Facility	New Primary and Secondary Schools Milford Haven	Milford Haven	Pembrokeshire Marine - outer	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
SP 14	S/EMP/086/LDP/01	Strategic Employment	Blackbridge	Milford Haven	Pembrokeshire Marine - outer	There could be retained infrastructure from previous uses, but it would be likely to need comprehensive upgrade or replacement if the site is redeveloped.
SP 14	S/EMP/034/LDP/02	Strategic Employment	Goodwick- Parrog	Goodwick	West Wales Marine (direct)	
SP 14	S/EMP/086/LDP2/01	Strategic Employment	Thornton Industrial Estate cluster (Hayguard Hay, Thornton)	Milford Haven	Pembrokeshire Marine - outer	Site will need service extensions to connect into existing public sewerage systems.
SP 15	S/EMP/000/00003	Safeguarded Strategic Employment	Milford Haven Petrochemical storage facility	Milford Haven	Pembrokeshire Marine outer	
SP 15	S/EMP/086/00003	Safeguarded Strategic Employment	Thornton Industrial Estate cluster	Milford Haven	Pembrokeshire Marine - outer	
SP 15	S/EMP/034/00003	Safeguarded Strategic Employment	Goodwick Industrial Estate	Goodwick	West Wales Marine (direct)	
SP 15	S/EMP/000/00007	Safeguarded Strategic Employment	South Hook LNG (part)	Milford Haven	Pembrokeshire Marine - outer	South Hook LNG (part) – likely to deal with most of its own waste generation on site.
SP 15	S/EMP/000/00002	Safeguarded Strategic Employment	Pembroke Oil Refinery (Valero)	Pembroke Dock	Pembrokeshire Marine outer - directly (Cleddau)	

Table 7 ‘No Likely Significant Effect’ Predicted – Road Schemes- Category G Screening

Reference	Scheme Name	Location	Notes	Screen In
TS/LDP2/04	Milford Haven public transport interchange	Milford Haven Train Station	Not within the catchment	No
TS/LDP2/08	Haverfordwest public transport interchange	Haverfordwest Bus Station	Within the catchment area	No – under construction July 2025

Likely Significant Effect Predicted

4.9. The following policies are expected to result in likely significant effects in terms of increasing nutrient waste in the affected area.

Table 8 ‘Likely Significant Effect’ Predicted – Strategic Policies

Policy Reference	Screening Category	Notes	Screen In
SP 04: 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.	Yes
SP 11: Countryside	I	Screened in – Although not spatially specific increased population increase generated nutrient waste leading to LSE in affected catchments.	Yes
SP 12: Maintaining and Enhancing the Environment	I	Screened In: DTA Handbook includes that - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12	Yes
SP 14: Strategic Employment Provision	I	Screened In: Project level HRA required for sites impacting Pembrokeshire marine SAC. This policy identifies strategic employment site allocations. The individual allocations are screened under Table 40 Other Allocations Screening. The policy allows for development of land for employment at locations where impacts on European sites are possible. Reference is made in paragraph 4.91 to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC which is helpful. The safeguards that are	Yes

Policy Reference	Screening Category	Notes	Screen In
		included in SP 13 regarding increases in nutrients are not also included here, however.	
SP 15: Safeguarding of Existing Employment Sites	I H	Screened in - This policy identifies existing employment sites which are safeguarded under specific use classes. The individual sites are screened under Table 40 Other Allocations Screening. These safeguarded sites include parts of sites that have not been developed. However, the policy's reasoned justification (4.97) explicitly refers to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC. The safeguards that are included in SP 13 regarding increases in nutrients are not also included here, however.	Yes

Table 9 'Likely Significant Effect' Predicted – General Policies

Policy	Screening Category	Screening conclusion	Screen In
GN 02 Sustainable Design	I	Screened in: policy listing general criteria for testing the acceptability / sustainability of proposals. Criterion 3 includes requirements for resource efficiency and climate responsive design regarding water conservation and the use of sustainable drainage systems (SuDS). Screened in	Yes
GN 03 Infrastructure and New Development	I	Screened in: this is a policy listing general criteria for testing acceptability defining requirements for proposals. Requirements do however include the need to require appropriate contributions for water, wastewater treatment and sewerage infrastructure but this is caveated in the final paragraph.	Yes
GN 04 Resource Efficiency and Renewable and Low-carbon Energy Proposals	B/I	Screened in: This is a policy listing the general criteria for testing acceptability of renewable energy proposals. It is not spatially specific but could be relevant to schemes which could result in the release of additional nutrients into the river system.	Yes

Policy	Screening Category	Screening conclusion	Screen In
GN 08 Employment Proposals	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect. NRW advice is that there may be cases where planning applications for new commercial or industrial developments, ... could result in the release of additional nutrients into the river system.	Yes
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 in the affected catchment area.	Yes
GN 13 Residential Development	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may be within the catchment area. The policy provides the framework for windfall proposals, conversions, and dwellings in the countryside.	Yes
GN 14 Replacement Dwellings in the Countryside	B/I	Screened in: policy listing general criteria and applies Plan wide. Depending on their detail and location proposals may have a likely significant effect where a larger replacement dwelling could result in the release of additional nutrients into the river system.	Yes
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.	Yes
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.	Yes
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 Pembs Marine SAC.	Yes
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 depending on any increase in resident population using the facility.	Yes

Policy	Screening Category	Screening conclusion	Screen In
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 the Marine SAC. Further assessment is required.	Yes
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 the Marine SAC.	Yes
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 the Marine SAC. Proposals may include residential development.	Yes
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 the Marine SAC. Proposals may include residential development.	Yes
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 the Pembrokeshire Marine SAC.	Yes
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	B/I	Part 1 screened in: Reference is made to roadside service areas and to public transport interchanges where non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the Marine SAC catchment. Unsure if this will be the case. Screened in as a precautionary. Part 2: Safeguarded routes see Table 41 below.	Yes

Policy	Screening Category	Screening conclusion	Screen In
their implementation.			
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.	I	Screened in: Part 1: Although not locationally specific proposals may come forward within the catchment area. Non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC catchment. Unsure if this will be the case. Screened in as a precautionary. Part 2: Screening of Trefigin Quarry Allocation see Table 40 Other Allocations Screening below.	Yes
GN 38 – Safeguarding and Prior Extraction of the Mineral Resource	I	Screen in: policy listing general criteria for testing the acceptability of proposals but also identifies the safeguarded resource on the Proposals Map. Proposals depending on their detail and location may have a likely significant effect. Criterion 2 provides for extraction <u>not</u> having an unacceptable impact on environmental or amenity considerations. However, a typo gives the opposite meaning.	Yes
GN 39 – Secondary Aggregates and Recycled Waste Minerals	B/I	Screened in: policy listing general criteria for the acceptability of proposals. Although not locationally specific a proposal may come forward within the catchment area. Non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of a SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the case. Screened in as a precautionary.	Yes
GN 47 Water Quality and Protection of Water Resources	I	Screened In: DTA Handbook includes that - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12	Yes
GN 53 Community Growing Spaces	B/I	Screened in: Policies listing general criteria for testing the acceptability. May include the potential use of more intensive forms of fertilization.	Yes

Policy	Screening Category	Screening conclusion	Screen In
GN 54 – Visitor Attractions and Leisure Facilities	B/I	Screened in: There may be cases where planning applications for new commercial or industrial developments, such as conference facilities, large retail sites or major tourist attractions could result in the release of additional nutrients into the river system.	Yes
GN 55 – Serviced and Hotel Accommodation	B/I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes
GN 56 – Caravan, Camping and Chalet Development	B/I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes
GN 57 – Site Facilities on Existing Caravan and Camping Sites	B/I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes
GN 58 Self-Catering Accommodation	B/I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes
GN 59 – Waste Management Facilities The policy is in two parts. Part 1 lists	B/I	Part 1 Screened in: policy listing general criteria, however proposals depending on their detail and location may have an impact in the catchment. Part 2 Potential sites - see Table 40.	Yes

Policy	Screening Category	Screening conclusion	Screen In
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.			
GN 60 – Disposal of Waste on Land	B/I	Screened in: Part 1: Although not locationally specific proposals may come forward within the catchment area. Non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC catchment. Unsure if this will be the case. Screened in as a precautionary.	Yes

- 4.10. The following allocations and schemes are expected to result in likely significant effects in terms of increasing nutrient waste in the affected area.

Table 10 ‘Likely Significant Effect’ Predicted – Policy GN 16 Housing Allocations Category I Screening*

*To note some sites may include land with planning permission where the Council can no longer require Habitats Regulations Assessment screening.

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/029/00014	Yes	Opposite Woodholm Close	Crundale	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/048/00038	Yes	North of Hayston View	Johnston	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/052/00011	Yes	South of Cleggars Park	Lamphey	Pembrokeshire Marine inner	Yes

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/063/00024	Yes	North of The Kilns	Llangwm	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/093/00066	Yes	East of Poppy Drive	Neyland	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/095/00144	Yes	North of Gibbas Way	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/096/00238	Yes	North of Pembroke Road	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/120/00018	Yes	North West of Wesley Way	Spittal	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/003/LDP2/1	Yes	North of Begelly Farm	Begelly	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/022/LDP2/1	Yes	Land at Dungleddy Court	Clarbeston Road	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/152/LDP2/1	Yes	South of Bro'r Dderwen	Clunderwen	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/029/LDP2/1	Yes	West of Ashford Park	Crundale	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/040/LDP2/1	Yes	Former Education Centre, Dew Street	Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/043/LDP2/1	Yes	Adjacent to Brackenhurst	Hill Mountain	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/046/LDP2/1	Yes	Land at West End Cottages	Hundleton	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/047/LDP2/1	Yes	South of The Crown	Jeffreyston	Pembrokeshire Marine inner - directly (Cleddau) - and to note that there is no water company WwTW in this settlement.	Yes
HSG/048/LDP2/1	Yes	Maes yr Ysgol	Johnston	Pembrokeshire Marine inner - directly (Cleddau)	Yes

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/049/LDP2/1	Yes	East of Brookfield Close	Keeston	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/050/LDP2/1	Yes	South of Rock Park	Kilgetty	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/052/LDP2/1	Yes	Adjacent to Lamphey School	Lamphey	Pembrokeshire Marine inner	Yes
HSG/053/LDP2/1	Yes	Between Longstone Court and 62, St. Davids Road	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/060/LDP2/1	Yes	Adjacent to Maesybryn	Llandissilio	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/066/LDP2/1	Yes	East of Hazelbank	Llanstadwell	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/081/LDP2/1	Yes	West of Globe Inn	Maenclochog	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/088/LDP2/1	Yes	West of Bloomfield Gardens and North of Adams Drive & Highfield Park	Narberth	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/095/LDP2/1	Yes	Between St Daniels Hill & Norgans Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/096/LDP2/1	Yes	Land at Hampshire Drive	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/113/LDP2/01	Yes	South of Robeston Court	Robeston Wathen	Pembrokeshire Marine inner - (via riverine Cleddau) - and to note that there is no water company WwTW in this settlement.	Yes
HSG/119/LDP2/1	Yes	Between Cornerways and Austalise	Simpson Cross	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/135/LDP2/1	No	North of Bulford Road Bypass	Tiers Cross	Pembrokeshire Marine inner - directly (Cleddau) - sewers drain out - surface	Yes

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
				water possibly in. Screen in for surface water.	
HSG/149/LDP2/1	Yes	Land at Ford Farm	Wolfscastle	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/095/LDP2/2	Yes	South West of Southlands, St. Daniels Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/096/LDP2/2	Yes	West of Stranraer Road	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/040/LDP2/3	Yes	Rear of 76 Pembroke Road	Merlins Bridge	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/096/LDP2/3	Yes	Land south of Sycamore Woods and west of Lavinia Drive	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/095/LDP2/4	Yes	East of Golden Hill Road	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/095/LDP2/5	Yes	South East of Southlands St.Daniels Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes
S/HSG/040/LDP2/6	Yes	Slade Lane	Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/086/LDP2/7	No	North East of Beaoning, Steynton	Milford Haven	Pembrokeshire Marine inner - directly (Cleddau) - there is a watershed issue on this site - The Beaoning Field Site needs to be screened in for surface water - to be cautious. Welsh Water have said the site can connect to the foul sewer and sewer flow will go to the Milford WwTW which is outside the inner catchment area.	Yes

- 4.11. The following sites with planning permission for housing under Policy GN 17 Residential Commitments have been reviewed as a desktop exercise and are considered from the evidence available to have reached a stage in their implementation where there is likely to be an opportunity to consider screening for HRA.

Table 11 ‘Likely Significant Effect’ Predicted – Policy GN 17 Housing Commitments

Allocation Name	LDP Reference	Site Total	Units under construction	Commitment Units Remaining in plan period (NS only)	Conclusion	Screen In Unit No.
Calvary Church	040/00373	8	0	8	In	8
Snooker Club	040/00430	16	0	8	In	8
Land N of Cleddau Bridge Hotel	096/00274	5	1	2	In	3
Land N of Cleddau Bridge Hotel	096/00375	14	0	7	In	7
Green Haven, Monkton	095/00180	30	0	11	In	11
Springfield	095/00240	5	0	2	In	1
Rushacre Gardens	088/00077	54	0	27	In	1
Dingle Farm	088/00074	33	0	16	In	16
North of New Road	003/00040	70	0	35	In	35
South of Tinker's Fold	025/00028	6	2	4	In	5
Dingle Lane	029/00013	40	0	1	In	1
Woodholm Farm	029/00026	5	1	2	In	3
Leven Close	044/00050	13	0	1	In	1
Cyfin Barn Farm	044/00063	11	1	3	In	4
Harcourt Close	044/00015	40	0	28	In	5
Maes Roslyn	081//LDP/01	13	0	13	In	4
Sageston Fields	015/00022	38	0	7	In	7
Barnlake Point	154/00001	22	1	10	In	10
Hawn Lake	011/00011	13	0	1	In	1
Land to the S of Kiln Park	012/00004	8	1	6	In	2

- 4.12. It is recognised that further investigation may be necessary to provide a definitive view and the table may not be an entirely faithful reflection of the ongoing circumstances surrounding a site. Officers have used a precautionary approach in terms of screening out sites. The purpose of this exercise is not to provide a definitive view for screening future applications on these sites but to scope out the likely extent of the housing land supply potentially impacted by nutrient neutrality for nitrogen.

Table 12 ‘Likely Significant Effect’ Predicted – Other Allocations Category I Screening

(Policy GN 05, GN 09, GN 10, GN 23, GN 24, GN 30, GN 59, SP 14, SP 15)

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

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
GN 09	EMP/132/LDP2/01	Employment	South of KP Thomas & Sons	Templeton	No public sewerage. Crosses watershed - Either Pembrokeshire Marine inner - (via riverine Cleddau) or Carmarthen Bay and Estuaries	No public sewerage. Crosses watershed
GN 10	MXU/095/LDP2/01	Mixed Use	South Quay	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Work concerning Castle Terrace is caught as amendment application is with the authority.
GN 23	SSA/135/LDP2/01	Supported Accommodation	North of Bulford Road Bypass, Tiers Cross	Tiers Cross	Pembrokeshire Marine inner - directly (Cleddau)	Inside catchment but sewered connection flows outside (include for SUDS)
GN 23	SSA/088/LDP2/01	Supported Accommodation	Redstone, Narberth	Narberth	Pembrokeshire Marine inner - directly (Cleddau)	Crosses watershed
GN 24	GT/003/LDP2/01	Gypsy Site	West of Kingsmoor Common Gypsy and Traveller site	Kilgetty	Pembrokeshire Marine inner - (via riverine Cleddau)	
GN 24	GT/040/LDP2/01	Gypsy Site	East of Withybush Gypsy and Traveller site	Crundale/ Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	There are no public sewers in close proximity and the site lies within the catchment of Cleddau Rivers SAC. A private treatment system will need to be provided in line with NRW advice. This could be

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

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

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
					into Pembrokeshire Marine inner (Cleddau)	its own waste generation on site.
SP 15	S/EMP/096/00005	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock cluster (Kingswood)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/096/00004	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock cluster (Ferry Lane)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/096/00003	Safeguarded Strategic Employment	Pembroke Dock cluster (West Llanion)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/040/00011	Safeguarded Strategic Employment	Withybush cluster (East Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.
SP 15	S/EMP/040/00012	Safeguarded Strategic Employment	Withybush cluster (North Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes
						are requiring this at Withybush.
SP 15	S/EMP/040/00015	Safeguarded Strategic Employment	Withybush cluster (Lodge Estate)	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.
SP 15	S/EMP/096/00002	Safeguarded Strategic Employment	Pembroke Dock cluster (Royal Dockyard)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.
SP 15	S/EMP/095/00001	Safeguarded Strategic Employment	Pembroke Power Station	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Pembroke Power Station – likely to deal with most of its own waste generation on site.

Table 13 ‘Likely Significant Effect’ Predicted – Road Schemes – Category I Screening

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

4.13. The table below provides a count of policies and allocations screened in and out:

Table 14 Summary of Screening outcomes

Policy Group	Screened out Count	Screened in Count	Total
Strategic Policies ⁹	16	5	21
General Policies ¹⁰	32 (includes a count of 8 policies ¹¹ screened separately)	29	61
Housing Allocations (Policy GN 16)	16	39	55
Housing Commitments (Policy GN 17)	46	20	66
Other Allocations	16	31	44
Route Safeguarding	2	2	4

4.14. A total of 5 strategic policies, 29 general policies, 39 housing allocations, 20 housing commitment sites, 31 ‘other allocations’ and 2 route safeguarding schemes within the Plan are considered to have the potential to result in likely significant effect on a European site either alone or in-combination.

⁹ SP 14 and SP 15 include allocated and safeguarded sites which are screened separately under ‘Other Allocations’

¹⁰ Some **General Policies are in two parts**: Part 1 elements are screened under ‘General Policies’. Part 2 elements which include allocations are screened under ‘Other Allocations’. Policies with two parts:

GN 05 -Renewable Energy

GN 10 -Mixed-use Housing and Employment Proposals

GN 36 – Transport Routes and Improvements

GN 37 – Working of Minerals – allocation

GN 59 – Waste Management Facilities – allocation

¹¹ **Policies screened under ‘Other Allocations’**

GN 09 Employment Allocations

GN 17- Residential Commitments

GN 18 -Slade Lane, Haverfordwest

GN 19a- Maesgwynne, Fishguard

GN 19b -South of Conway Drive, Castle Pill Road, Steynton

GN 23 – Specialist and Supported Accommodation Allocations

GN 24 -Gypsy and Traveller Site Allocations

GN 30 – Community Facility Allocations

5. Stage 2 Appropriate Assessment

- 5.1. Consideration will be given to the likelihood of the development proposed resulting in significant effects associated with the Milford Haven Inner WFD waterbody and areas draining into this, which include the upstream freshwater SAC catchment of the Western and Eastern Cleddau.
- 5.2. Increases in population can place stress on existing drainage infrastructure and wastewater treatment facilities. Increasing the flow of wastewater to existing treatment facilities could result in increasing the nutrient load in effluent discharges (e.g. at outfalls) thereby decreasing water quality. Impacts to water quality can lead to negative effects on European sites such as increased eutrophication (nutrient enrichment) and algal blooms leading to oxygen depletion affecting aquatic organisms, as well as smothering of marine vegetation and muds.
- 5.3. NRW has advised **that a conclusion of no adverse effect on site integrity may be drawn in a Habitats Regulations Assessment, where any plans or projects in these areas (as set out above in paragraph 5.1) with the potential to increase nutrient discharges can secure appropriate mitigation and demonstrate nutrient neutrality for nitrogen.**
- 5.4. It is concluded that the proposals will require appropriate assessment in order to test the plan for its effects on European site integrity. Article 6 (3) of the Habitats Directive states that a plan may only be agreed ‘...**after** having ascertained that it will not adversely affect the integrity of the site concerned.’
- 5.5. The screening assessment undertaken in ‘Appendix 1 Screening’ identifies those policies and sites that are likely to have a significant effect on the Pembrokeshire Marine SAC unless appropriate mitigation can be secured.

Local Development Plan Policies and Allocations - Mitigation

- 5.6. Policies detailed within the Deposit 2 Local Development Plan 2 will provide, to some degree, safeguards and a level of mitigation – see Table 15 Existing Safeguards and Mitigation in Policy below.

However, a more explicit commitment to mitigation to achieve nutrient neutrality for nitrogen is required within the Local Development Plan see paragraph 5.8 to 5.17 below and Table 16 Recommended Additional Mitigation for Strategic Policies to

- 5.7. Table 21 Recommended Mitigation for Safeguarded Routes.

Table 15 Existing Safeguards and Mitigation in Policy

Policy Reference	Text/Policy or Reasoned Justification
SP 12 Maintaining and Enhancing the Natural Environment	Policy: Within the National Site Network, which includes: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), development will only be permitted which demonstrates compliance with the Conservation of Habitats and Species Regulations 2017, and The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (and any subsequent amendments). Proposals with the potential to have Likely Significant Effects must undertake a 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.
SP 13 Port and Energy Related Development and Celtic Freeport	Reasoned Justification: 4.80: Individual proposals coming forward under policy SP 13 will require project level Habitats Regulation Assessment to consider their likely significant effects on the features of the SAC. One element of this is that there must be no increase in nutrients into the Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes.
SP 14 Strategic Employment Provision	Reasoned Justification: 4.91: Natural Resources Wales has advised that all Strategic Employment Sites at Withybush must connect to the public foul sewer. Environmental Permits for private drainage will not be issued here. It also advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire Marine SAC will require Habitats Regulations Assessment (HRA).
GN 1 General Development Policy	Criterion 5) It respects and protects the natural environment with no unacceptable adverse effects (a harmful impact that cannot be satisfactorily mitigated) on the environment including protected sites, habitats and species;.. 9) It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on water quality (see also policy GN 47); Reasoned justification 5.11: There is further detail on policy requirements relating to water quality in policy GN 47 Water Quality and Protection of Water Courses. This is a reflection in particular of the raised awareness of river catchment pollution issues relating to nutrients, including phosphates and nitrates, which affects the rivers protected by SAC designations in Pembrokeshire, the Afon Teifi and the Afon Cleddau. There is new guidance from Natural Resources Wales on phosphates in the non-tidal parts of the SAC rivers in Wales and it has been found that the levels of phosphates in the non-tidal parts of both the Teifi and Cleddau catchments are too high. It is anticipated that further guidance from Natural Resources Wales, but relating to the tidal parts of the SAC rivers in Wales (including the Teifi and Cleddau), will be issued in the future. 5.12 With reference to sustainable drainage, new developments of more than one dwelling, or where the area covered by construction work equals or exceeds 100 square metres, require approval from the SuDS Approving Body (SAB) – which in Pembrokeshire is the County Council. Construction cannot commence until SuDS approval from the SAB is in place – even if planning permission has been granted. 5.13 Planning Policy Wales, edition 12, advises that the provision of SuDS should form an integral part of the design of new

Policy Reference	Text/Policy or Reasoned Justification
	development and should be an early-stage task in putting together development proposals. 5.14 For Development Planning purposes, PPW edition 12 advocates collaborative approaches to sustainable drainage, drawing on evidence obtained through green infrastructure assessments, with a view to integrating SuDS into growth strategies for particular areas. The provisions of this Plan, in combination with the SuDS schemes approved by the SAB, will help to deliver that aspiration. 5.15 When providing SuDS, it may sometimes be necessary to use hard infrastructure solutions, for instance where there are important archaeological considerations. However, in most cases, nature-based solutions are the preferred option. Where ground conditions preclude the use of SuDS, for instance where glacial tills are present, the next best available solution to site drainage will be sought.
GN 2 Sustainable Design	Policy:3) it includes a resource efficient and climate responsive design through..., water conservation and the use of sustainable drainage systems. Reasoned justification: 5.23 The introduction of the Sustainable Drainage Scheme (SuDS) consenting regime in early 2019 will make the inclusion of SuDS in all development of over 100m2 or for 2 or more dwellings mandatory. Early consideration to the design layout requirement for SUDS should be given.
GN 3 Infrastructure and New Development	Policy: Measures necessary to physically deliver a development and ensure that it is acceptable in planning terms will be required in the first instance. Where appropriate contributions may be sought for a range of purposes, including ... 11. Water, Wastewater Treatment and Sewerage Infrastructure.
GN 35 Marinas	Reasoned Justification: 5.190.... These aspects of development proposals will frequently require Environmental Impact Assessment. Some such projects may also require Habitats Regulations Assessment..
GN 41 Protection of National Statutory Environmental Designations	Policy: Proposals likely to have a direct or indirect adverse effect on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) will be subject to a Habitats Regulation Assessment (HRA). Reasoned Justification: 5.239 Habitats Regulation Assessment - Within the National Site Network, which includes: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), development will only be permitted which demonstrates compliance with the Conservation of Habitats and Species Regulations 2017, and The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (and any subsequent amendments). 5.240 Proposals likely to have a direct or indirect adverse effect on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites must be subject to Habitats Regulation Assessment (HRA). Development requiring HRA will only be permitted where it can be determined that the proposal would not result in adverse effects on the species or integrity of the habitat or site, either alone, or in combination with other plans or projects. 5.241 Proposals may also be permitted where the HRA proves there are no alternatives, and that the development is of overriding public interest (IROPI) and appropriate compensatory measures are secured.

5.8. Policy GN 47 Water Quality and Protection of Water Resources is a key policy in the Plan. It sets out the Plan's requirements in relation to the protection of water

quality and water resources. The policy sets out a framework for incorporating SuDS into development proposals; safeguarding watercourses with the use of ecological buffer zones and providing flood plain capacity. The policy is framed to then focus on demonstrating no adverse effect on phosphorous sensitive riverine Special Areas of Conservation. The policy as drafted does not cover nutrient neutrality requirements.

- 5.9. Given that the issue of nutrient neutrality continues to emerge for different geographies and different nutrient types in the Plan area the recommended mitigation is to ensure **that the Local Development Plan includes sufficient safeguards so that there is no net increase in catchments where nutrient neutrality is mandated by Natural Resources Wales.**
- 5.10. All relevant developments within the catchment, will need to demonstrate that they are nutrient neutral (for the time frame that is mandated), either by their own means or through contributions to an agreed nutrient mitigation scheme, for the lifetime of the development.
- 5.11. Natural Resources Wales advice is that this requirement applies to residential development, tourist attractions and other development involving an overnight stay. There may also be cases where planning applications for certain new commercial or industrial developments, and for conference facilities, large retail sites or major tourist attractions could result in the release of additional nutrients into the river system. In such cases, further assessment is likely to be required to determine if the proposal will have an adverse effect on the integrity of the river or Marine SAC as the nature of the impact of the proposal can only be understood when the details of the proposal become available.
- 5.12. This advice, together with other information, **including the All Wales Nutrient Budget Calculator** which should be used to prepare a nitrogen budget to accompany applications, is available on the Council's Nutrient Neutrality webpage¹².
- 5.13. It is proposed to include the following paragraph at the end of Policy GN 47 Water Quality and Protection of Water Resources to form part of the main policy wording:
- 5.14. ***'Where nutrient neutrality is required development involving an overnight stay (including dwellings and all forms of holiday accommodation) that discharges into a nutrient neutrality designated SAC catchment (either surface water, non mains drainage development or through wastewater treatment works) will be required to demonstrate that it will be nutrient neutral for the lifetime of the development, either by its own means or by means of agreed mitigation measures. In addition, proposals that serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the affected SAC catchment will also be required to demonstrate nutrient neutrality. Policy GN 3 Infrastructure and New Development***

¹² <https://www.pembrokeshire.gov.uk/planning-and-ecology/phosphates-guidance-from-national-resources-wales>

provides for the timely delivery of infrastructure (see criterion 2 bullet point 11). This would include water treatment infrastructure to ensure no adverse effects result.

- 5.15. Reasoned Justification: Add to the end of the reasoned justification of Policy GN 47:

‘To ensure there is no net increase in nutrients, all relevant developments with drainage pathways into the nutrient neutrality waterbodies identified by Natural Resources Wales will need to demonstrate that they are nutrient neutral, either by their own means or through contributions to an agreed nutrient mitigation scheme, for the lifetime of the development. This requirement applies to residential development, tourist attractions, other development involving an overnight stay and development expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the affected SAC catchment. The relevant catchments are identified from time to time in advice published by Natural Resources Wales. This advice, together with other information, including the All Wales Nutrient Budget calculator should be used to prepare a nitrogen budget to accompany applications, and is available on the Council’s Nutrient Neutrality webpage¹³. Any guidance Natural Resources Wales produce will be considered a material consideration at that stage, together with Policy GN 47 on Water Quality and Protection of Water Resources. Drainage requirements will need to be considered at the design stage and be developed and implemented in accordance with recognised standards’.

- 5.16. A detailed edit of this policy is recommended to ensure that adequate protection is given to water quality issues arising from ongoing monitoring work being carried out in Special Areas of Conservation in the Plan area. Proposals will require careful consideration and compliance with this key Policy.
- 5.17. The mitigation required to strategic policies and other general policies of the Plan would necessitate a cross reference to this policy, as proposed for amendment (see "" policies in this mitigation column). Given the significance of the implications of this Policy requirement it is proposed to elevate this policy to be a strategic policy of the Plan to be identified as ‘Policy SP12a Water Quality and Protection of Water Resources.’
- 5.18. The table below highlights where mitigation in relation to those Strategic policies that were screened in (see Appendix 1 Screening) is required.

Mitigation Recommendations Strategic Policies
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¹³ Guide being prepared for the Council – consultancy being commissioned 24th September 2025.

Table 16 Recommended Additional Mitigation for Strategic Policies

Policy Reference	Screening Category	Notes	Screen In	Mitigation Proposed
SP 04: 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.	Yes	A detailed edit of Policy GN 47 Water Quality and Protection of Water Resources is proposed (see paragraph 5.8 to 5.167.2) to ensure that adequate protection is given to water quality issues arising from ongoing monitoring work being carried out in Special Areas of Conservation in the Plan area. Proposals will require careful consideration and compliance with this key Policy, i.e. Policy GN 47. The mitigation required to other strategic policies of the Plan would necessitate a cross reference to Policy GN 47, as proposed for amendment, in 4 other Strategic Policies of the Plan (see "" policies in this mitigation column). Given the significance of the implications of this Policy requirement it is proposed to elevate Policy GN 47 to be a strategic policy of the Plan to be identified as Policy SP12a Water Quality and Protection of Water Resources.
SP 11: Countryside	I	Screened in – Although not spatially specific increased population increase generated nutrient waste leading to LSE in affected catchments.	Yes	*(see Policy SP 4 commentary)
SP 12: Maintaining and Enhancing the Environment	I	Screened In: DTA Handbook includes that - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12	Yes	*(see Policy SP 4 commentary)

Policy Reference	Screening Category	Notes	Screen In	Mitigation Proposed
SP 14: Strategic Employment Provision	I	Screened In: Project level HRA required for sites impacting Pembrokeshire Marine SAC. This policy identifies strategic employment site allocations. The individual allocations are considered in 'Table 20 Recommended Mitigation for 'Other Allocations' below. The policy allows for development of land for employment at locations where impacts on European sites are possible. Reference is made in paragraph 4.91 to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC which is helpful. The safeguards that are included in SP 13 regarding increases in nutrients are not also included here, however.	Yes	*(see Policy SP 4 commentary)
SP 15: Safeguarding of Existing Employment Sites	I H	Screened in - This policy identifies existing employment sites which are safeguarded under specific use classes. The individual sites are screened below. These safeguarded sites include parts of sites that have not been developed. However, the policy's reasoned justification (4.97) explicitly refers to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC. The safeguards that are included in SP 13 regarding increases in nutrients are not also included here, however.	Yes	* (see Policy SP 4 commentary)

Mitigation Recommendations General Policies

5.19. The table below highlights where mitigation in relation to those General Policies that were screened in (see Appendix 1 Screening) is required. For “*” policy references in the mitigation column please refer to paragraph 5.8 to 5.16 for proposed mitigation.

Table 17 Recommended Mitigation for General Policies

Policy	Screening Category	Screening conclusion	Screen In	Mitigation
GN 2 Sustainable Design	I	Screened in: policy listing general criteria for testing the acceptability / sustainability of proposals. Criterion 3 includes requirements for resource efficiency and climate responsive design regarding water conservation and the use of sustainable drainage systems (SuDS). Screened in	Yes	*(see Policy GN 47 commentary)
GN 3 Infrastructure and New Development	I	Screened in: this is a policy listing general criteria for testing acceptability defining requirements for proposals. Requirements do however include the need to require appropriate contributions for water, wastewater treatment and sewerage infrastructure but this is caveated in the final paragraph.	Yes	Add the words '(including water quality)' after the word 'Water' in criterion 11. Add a paragraph to the end of the reasoned justification: <i>The need to ensure that proposals provide required mitigation to meet Policy GN 47 Water Quality and Protection of Water Resources will be considered to be an 'overwhelming need' within the terms of this policy.</i>
GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	B/I	Screened in: This is a policy listing the general criteria for testing acceptability of renewable energy proposals. It is not spatially specific but could be relevant to schemes which could result in the release of additional nutrients into the river system.	Yes	*(see Policy GN 47 commentary)
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. NRW advice is that there may be cases where planning applications for new commercial or industrial developments, ... could result in the release of additional nutrients into the river system.	Yes	*(see Policy GN 47 commentary)

Policy	Screening Category	Screening conclusion	Screen In	Mitigation
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 in the -affected catchment area.	Yes	*(see Policy GN 47 commentary)
GN 13 Residential Development	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may be within the catchment area. The policy provides the framework for windfall proposals, conversions, and dwellings in the countryside.	Yes	*(see Policy GN 47 commentary)
GN 14 Replacement Dwellings in the Countryside	B/I	Screened in: policy listing general criteria and applies Plan wide. Depending on their detail and location proposals may have a likely significant effect -where a larger replacement dwelling could result in the release of additional nutrients into the river system.	Yes	*(see Policy GN 47 commentary)
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.	Yes	*(see Policy GN 47 commentary)
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.	Yes	*(see Policy GN 47 commentary)
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 Pems Marine SAC.	Yes	*(see Policy GN 47 commentary)
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 -depending on any increase in resident population using the facility.	Yes	*(see Policy GN 47 commentary)
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	Yes	*(see Policy GN 47 commentary)

Policy	Screening Category	Screening conclusion	Screen In	Mitigation
		likely significant effect on the Marine SAC. Further assessment is required.		
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 the Marine SAC.	Yes	*(see Policy GN 47 commentary)
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 the Marine SAC. Proposals may include residential development.	Yes	*(see Policy GN 47 commentary)
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 the Marine SAC. Proposals may include residential development.	Yes	*(see Policy GN 47 commentary)
GN 35 – Marinas	B / I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant on the Pembrokeshire Marine SAC.	Yes	*(see Policy GN 47 commentary)
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	B/I	Part 1 screened in: Reference is made to roadside service areas and to public transport interchanges where non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the case. Screened in as a precautionary. Part 2: Safeguarded routes see Table 41	Yes	*(see Policy GN 47 commentary)

Policy	Screening Category	Screening conclusion	Screen In	Mitigation
developments that might compromise their implementation.				
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.	I	Screened in: Part1: Although not locationally specific, <u>proposals</u> may come forward with the catchment area. Non-residential development may lead <u>s</u> to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the case. Screened in as a precautionary. Part 2: Screening of Trefigin Quarry Allocation see Table 40.	Yes	*(see Policy GN 47 commentary)
GN 38 – Safeguarding and Prior Extraction of the Mineral Resource	I	Screen in: policy listing general criteria for testing the acceptability of proposals but also identifies the safeguarded resource on the Proposals Map. Proposals depending on their detail and location may have a likely significant effect. Criterion 2 provides for extraction <u>not</u> having an unacceptable impact on environmental or amenity considerations. However, a typo gives the opposite meaning.	Yes	Criterion 2) has a typographical error contained in it which will require a Matters Arising Change. 'Extraction would <u>not</u> have an unacceptable impact on environmental or amenity considerations; or' *(see also Policy GN 47 commentary)
GN 39 – Secondary Aggregates and Recycled Waste Minerals	B/I	Screened in: policy listing general criteria for the acceptability of proposals. Although not locationally a specific proposal, <u>a proposal might</u> may come forward with <u>in</u> the catchment area. Non-residential development may lead <u>s</u> to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the case. Screened in as a precautionary.	Yes	*(see Policy GN 47 commentary)

Policy	Screening Category	Screening conclusion	Screen In	Mitigation
GN 47 Water Quality and Protection of Water Resources	I	Screened In: DTA Handbook includes that - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12	Yes	A detailed edit of this policy is proposed to ensure that adequate protection is given to water quality issues arising from ongoing monitoring work being carried out in Special Areas of Conservation in the Plan area. Proposals will require careful consideration and compliance with this key Policy. The mitigation required to other general policies of the Plan would necessitate a cross reference to this policy, as proposed for amendment, in over 25 other general policies of the Plan (see "" policies in this mitigation column). Given the significance of the implications of this Policy requirement it is proposed to elevate this policy to be a strategic policy of the Plan to be identified as Policy SP12a Water Quality and Protection of Water Resources. See paragraph 5.8 to 7.2 for edits proposed.
GN 53 Community Growing Spaces	B/I	Screened in: Policies listing general criteria for testing the acceptability. May include the potential use of more intensive forms of fertilization.	Yes	*(see Policy GN 47 commentary)
GN 54 – Visitor Attractions and Leisure Facilities	B/I	Screened in: There may be cases where planning applications for new commercial or industrial developments, such as conference facilities, large retail sites or major tourist attractions could result in the release of additional nutrients into the river system.	Yes	*(see Policy GN 47 commentary)
GN 55 – Serviced and Hotel Accommodation	B/I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes	*(see Policy GN 47 commentary)

Policy	Screening Category	Screening conclusion	Screen In	Mitigation
GN 56 – Caravan, Camping and Chalet Development	B / I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes	*(see Policy GN 47 commentary)
GN 57 – Site Facilities on Existing Caravan and Camping Sites	B / I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes	*(see Policy GN 47 commentary)
GN 58 Self-Catering Accommodation	B/I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes	*(see Policy GN 47 commentary)
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	B/I	Part 1 Screened in: policy listing general criteria, however proposals depending on their detail and location may have an impact in the catchment. Part 2 Potential sites – see Table 40.'	Yes	*(see Policy GN 47 commentary)

Policy	Screening Category	Screening conclusion	Screen In	Mitigation
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.				
GN 60 – Disposal of Waste on Land	B/I	Screened in: Part 1: Although not locationally specific proposals may come forward within the catchment area. Non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC catchment. Unsure if this will be the case. Screened in as a precautionary.	Yes	*(see Policy GN 47 commentary)

Mitigation Recommendations Housing Allocations Policies

5.20. The table below highlights where mitigation in relation to those Housing allocations that were screened in (see Appendix 1 Screening) is required.

Table 18 Recommended Mitigation for Housing Allocations *

*To note some sites may include land with planning permission where the Council can no longer require Habitats Regulations Assessment screening.

LDP2_Reference	Site Name	Settlement	Discharges to SAC	Mitigation
HSG/003/LDP2/1	North of Begelly Farm	Begelly	Pembrokeshire Marine inner - directly (Cleddau)	Add paragraph to the end of Policy GN 16 Residential Allocations: <i>Individual proposals coming forward under policy GN 16 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven Inner catchment of the Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see also Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment).</i>
HSG/022/LDP2/1	Land at Dungleddy Court	Clarbeston Road	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/152/LDP2/1	South of Bro'r Dderwen	Clunderwen	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.

LDP2_Reference	Site Name	Settlement	Discharges to SAC	Mitigation
HSG/029/00014	Opposite Woodholm Close	Crundale	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/029/LDP2/1	West of Ashford Park	Crundale	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/040/LDP2/1	Former Education Centre, Dew Street	Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
S/HSG/040/LDP2/6	Slade Lane	Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/043/LDP2/1	Adjacent to Brackenhurst	Hill Mountain	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/046/LDP2/1	Land at West End Cottages	Hundleton	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/047/LDP2/1	South of The Crown	Jeffreyston	Pembrokeshire Marine inner - directly (Cleddau) - and to note that there is no water company WwTW in this settlement.	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/048/00038	North of Hayston View	Johnston	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.

LDP2_Reference	Site Name	Settlement	Discharges to SAC	Mitigation
HSG/048/LDP2/1	Maes yr Ysgol	Johnston	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/049/LDP2/1	East of Brookfield Close	Keeston	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/050/LDP2/1	South of Rock Park	Kilgetty	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/052/00011	South of Cleggars Park	Lamphey	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/052/LDP2/1	Adjacent to Lamphey School	Lamphey	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/053/LDP2/1	Between Longstone Court and 62, St. Davids Road	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/060/LDP2/1	Adjacent to Maesybryn	Llandissilio	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/063/00024	North of The Kilns	Llangwm	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.

LDP2_Reference	Site Name	Settlement	Discharges to SAC	Mitigation
HSG/066/LDP2/1	East of Hazelbank	Llanstadwell	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/081/LDP2/1	West of Globe Inn	Maenclochog	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/040/LDP2/3	Rear of 76 Pembroke Road	Merlins Bridge	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/086/LDP2/7	North East of Beaoning, Steynton	Milford Haven	Pembrokeshire Marine - directly (Cleddau) - there is a watershed issue on this site - The Beaoning Field Site needs to be screened in for surface water - to be cautious. Welsh Water have said the site can connect to the foul sewer and sewered flow will go to the Milford WwTW which is outside the inner catchment area.	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/088/LDP2/1	West of Bloomfield Gardens and North of Adams Drive & Highfield Park	Narberth	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/093/00066	East of Poppy Drive	Neyland	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/095/00144	North of Gibbas Way	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.

LDP2_Reference	Site Name	Settlement	Discharges to SAC	Mitigation
HSG/095/LDP2/1	Between St Daniels Hill & Norgans Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/095/LDP2/2	South West of Southlands, St. Daniels Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/095/LDP2/4	East of Golden Hill Road	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/095/LDP2/5	South East of Southlands St.Daniels Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/096/00238	North of Pembroke Road	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/096/LDP2/1	Land at Hampshire Drive	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/096/LDP2/2	West of Stranraer Road	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/096/LDP2/3	Land south of Sycamore Woods and west of Lavinia Drive	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.

LDP2_Reference	Site Name	Settlement	Discharges to SAC	Mitigation
HSG/113/LDP2/01	South of Robeston Court	Robeston Wathen	Pembrokeshire Marine inner - (via riverine Cleddau) - <i>and to note that there is no water company WwTW in this settlement.</i>	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/119/LDP2/1	Between Cornerways and Austalise	Simpson Cross	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/120/00018	North West of Wesley Way	Spittal	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/135/LDP2/1	North of Bulford Road Bypass	Tiers Cross	Pembrokeshire Marine inner - directly (Cleddau) - sewers drain out - surface water possibly in. Screen in for surface water.	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.
HSG/149/LDP2/1	Land at Ford Farm	Wolfscastle	Pembrokeshire Marine inner - (via riverine Cleddau)	See mitigation proposed to allocation HSG/003/LDP2/1, North of Begelly Farm, Begelly.

Mitigation Recommendations Housing Commitments

Table 19 Recommended Mitigation for Housing Commitments

Allocation Name	LDP Reference	Screen In Unit No.	Mitigation
Calvary Church	040/00373	8	Add paragraph to the end of Policy GN 17 Residential Commitments: Individual proposals coming forward under policy GN 17 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven inner area of Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see also Policy 47 Water Quality and Protection of Water Resources as proposed for amendment).
Snooker Club	040/00430	8	See above for Calvary Church
Land N of Cleddau Bridge Hotel	096/00274	3	See above for Calvary Church
Land N of Cleddau Bridge Hotel	096/00375	7	See above for Calvary Church
Green Haven, Monkton	095/00180	11	See above for Calvary Church
Springfield	095/00240	1	See above for Calvary Church
Rushacre Gardens	088/00077	1	See above for Calvary Church
Dingle Farm	088/00074	16	See above for Calvary Church
North of New Road	003/00040	35	See above for Calvary Church
South of Tinker's Fold	025/00028	5	See above for Calvary Church
Dingle Lane	029/00013	1	See above for Calvary Church
Woodholm Farm	029/00026	3	See above for Calvary Church
Leven Close	044/00050	1	See above for Calvary Church
Cyfin Barn Farm	044/00063	4	See above for Calvary Church
Harcourt Close	044/00015	5	See above for Calvary Church
Maes Roslyn	081//LDP/01	4	See above for Calvary Church
Sageston Fields	015/00022	7	See above for Calvary Church
Barnlake Point	154/00001	10	See above for Calvary Church
Hawn Lake	011/00011	1	See above for Calvary Church
Land to the S of Kiln Park	012/00004	2	See above for Calvary Church

Mitigation Recommendations Other Allocation Sites

5.21. The table below highlights where mitigation in relation to those 'Other Allocations' that were screened in (see Appendix 1 Screening) is required. For '*' policy references in the mitigation column please refer to paragraph 5.8 to 5.17 for proposed mitigation.

Table 20 Recommended Mitigation for 'Other Allocations'

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
GN 09	EMP/034/00006	Employment	Celtic Link Business Park, Scleddau	Scleddau	No public sewerage. Crosses watershed - Either West Wales Marine via Goodwick Brook or Pembrokeshire Marine - (via riverine Cleddau)	No public sewerage. Crosses watershed.	Add paragraph to the end of the reasoned justification to Policy GN 09 Employment Allocations: Individual proposals coming forward under policy GN 09 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven inner area of Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see Policy also GN 47 Water Quality and Protection of Water Resources as proposed for amendment).	There may also be potential for onsite mitigation opportunities.
GN 09	EMP/132/LDP2/01	Employment	South of KP Thomas & Sons	Templeton	No public sewerage. Crosses watershed -	No public sewerage. Crosses watershed	See commentary for allocation EMP/034/00006 Celtic Link Business Park, Scleddau	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
					Either Pembrokeshire Marine inner - (via riverine Cleddau) or Carmarthen Bay and Estuaries			
GN 09	EMP/093/00001	Employment	North of Honeyborough Industrial Estate	Neyland	Pembrokeshire Marine inner-directly (Cleddau)		See commentary for allocation EMP/034/00006 Celtic Link Business Park, Scleddau	
GN 09	EMP/088/LDP/01	Employment	Rushacre Enterprise Park Extension Narberth	Narberth	Pembrokeshire Marine inner - (via riverine Cleddau)		See commentary for allocation EMP/034/00006 Celtic Link Business Park, Scleddau	
GN 09	EMP/053/00001	Employment	Old Station Yard, Letterston	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)		See commentary for allocation EMP/034/00006 Celtic Link Business Park, Scleddau	
GN 09	EMP/040/LDP2/01	Employment	Withybush Showground	Crundale/ Haverfordwest	Pembrokeshire Marine inner- (via riverine Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	See commentary for allocation EMP/034/00006 Celtic Link Business Park, Scleddau	There may also be potential for onsite mitigation opportunities.
GN 10	MXU/095/LDP2/01	Mixed Use	South Quay	Pembroke	Pembrokeshire Marine -inner directly (Cleddau)		Add paragraph to the end of Policy GN 10 Mixed Use Proposals reasoned	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
							justification. Individual proposals coming forward under policy GN 10 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven Inner Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see also Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment).	
GN 23	SSA/135/LDP2/01	Supported Accommodation	North of Bulford Road Bypass, Tiers Cross	Tiers Cross	Pembrokeshire Marine inner - directly (Cleddau)	Inside catchment but sewered connection flows outside (include for SUDS)	See commentary for allocation SSA/088/LDP2/01 Redstone, Narberth	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
GN 23	SSA/088/LDP2/01	Supported Accommodation	Redstone, Narberth	Narberth	Pembrokeshire Marine inner - directly (Cleddau)		Add paragraph to the end of Policy GN 23 Specialist and Supported Accommodation Allocations reasoned justification. Individual proposals coming forward under policy GN 23 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven inner area of Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see also Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment).	
GN 24	GT/095/LDP2/2	Gypsy Site	South of Monkton Playing Fields	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)		See commentary for allocation East of Withybush Gypsy and Traveller site.	There is potential for on-site mitigation opportunities.

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
GN 24	GT/003/LDP2/01	Gypsy Site	West of Kingsmoor Common Gypsy and Traveller site	Kilgetty	Pembrokeshire Marine inner - (via riverine Cleddau)		See commentary for allocation East of Withybush Gypsy and Traveller site.	There is potential for on-site mitigation opportunities.
GN 24	GT/040/LDP2/01	Gypsy Site	East of Withybush Gypsy and Traveller site	Crundale/ Haverfordw est	Pembrokeshire Marine inner - directly (Cleddau)	There are no public sewers in close proximity and the site lies within the catchment of Cleddau Rivers SAC. A private treatment system will need to be provided in line with NRW advice. This could be achieved by replacing the septic tank serving the existing site, as new packaged treatment plants can often demonstrate	Add paragraph to the end of reasoned justification for Policy GN 24 Gypsy and Traveller Site Allocations Individual proposals coming forward under policy GN 24 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven inner area of Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see also Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment).	There is potential for onsite mitigation opportunities.

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
						lower nutrient outputs with higher foul flows compared to existing septic tanks.		
GN 5	SPV/149/LDP2/01	Solar Array	Ford Farm, Wolfscastle	Wolfscastle	Pembrokeshire Marine inner - (via riverine Cleddau)	Screened in as a precautionary	Applications will be screened as part of the application process. Solar Arrays are unlikely to introduce additional nitrogen in the catchment. Policies of the Plan as proposed for amendment will provide adequate protection. Solar Arrays installed on agricultural land would be likely to reduce or remove agricultural activity.	
GN 5	SPV/066/LDP2/01	Solar Array	East of Hazelbank, Llanstadwell	Llanstadwell	Pembrokeshire Marine inner - directly (Cleddau)	Screened in as a precautionary	Applications will be screened as part of the application process. Solar Arrays are unlikely to introduce additional nitrogen in the catchment. Policies of the Plan as proposed for amendment will provide adequate protection. Solar Arrays installed on agricultural land would be likely to reduce or remove agricultural activity.	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
GN 59	EMP/146/00001	Waste Management	Waterston Industrial Estate	Llanstadwell	Pembrokeshire Marine inner - directly (Cleddau)	Outside area but if connects to sewered are then will flow in.	Add paragraph to the end of Policy GN 59 Waste Management Facilities: Individual proposals coming forward under policy GN 59 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven inner area of the Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see also Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment).	
SP 14	S/EMP/096/00001	Strategic Employment	Pembrokeshire Science & Technology Park cluster	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems.	The reasoned justification to Policy SP 14 Strategic Employment Sites advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire Marine SAC will require	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
							Habitats Regulations Assessment (HRA).See also proposed mitigation to the Policy GN 47 Water Quality and Protection of Water Resources (as proposed for amendment) which will require compliance against alongside Policy SP 14.	
SP 14	S/EMP/136/00001	Strategic Employment	Former RNAD Site, Trecwn	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)	The current WwTW in this area is unlikely to have capacity to serve any redevelopment of any significant scale on this site – a new (private) WwTW would therefore be needed.	The reasoned justification to Policy SP 14 Strategic Employment Sites advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire Marine SAC will require Habitats Regulations Assessment (HRA).See also proposed mitigation to the Policy GN 47 Water Quality and Protection of Water Resources (as proposed for amendment) which will require compliance against alongside Policy SP 14.	Yes
SP 14	S/EMP/040/00001	Strategic Employment	Withybush cluster (West Estate)	Crundale/ Haverfordw est	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage	The reasoned justification to Policy SP 14 Strategic Employment Sites advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire	There may also be potential for onsite mitigation opportunities.

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
						systems. NRW are requiring this at Withybush.	Marine SAC will require Habitats Regulations Assessment (HRA). See also proposed mitigation to the Policy GN 47 Water Quality and Protection of Water Resources (as proposed for amendment) which will require compliance against alongside Policy SP 14.	
SP 14	S/EMP/040/00004	Strategic Employment	Withybush cluster (Trading Estate)	Crundale/ Haverfordw est	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	The reasoned justification to Policy SP 14 Strategic Employment Sites advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire Marine SAC will require Habitats Regulations Assessment (HRA). See also proposed mitigation to the Policy GN 47 Water Quality and Protection of Water Resources (as proposed for amendment) which will require compliance against alongside Policy SP 14.	There may also be potential for onsite mitigation opportunities.
SP 14	S/EMP/040/00005	Strategic Employment	Withybush cluster (East of Lodge Estate)	Crundale/ Haverfordw est	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public	The reasoned justification to Policy SP 14 Strategic Employment Sites advises that any Strategic Employment Sites which have a potential to	There may also be potential for onsite

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
						sewerage systems. NRW are requiring this at Withybush.	impact on the Pembrokeshire Marine SAC will require Habitats Regulations Assessment (HRA). See also proposed mitigation to the Policy GN 47 Water Quality and Protection of Water Resources (as proposed for amendment) which will require compliance against alongside Policy SP 14.	mitigation opportunities.
SP 15	S/EMP/095/00001	Safeguarded Strategic Employment	Pembroke Power Station	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Pembroke Power Station – likely to deal with most of its own waste generation on site.	The reasoned justification to Policy SP 15 Safeguarding of existing Strategic Employment Sites advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire Marine SAC will require Habitats Regulations Assessment (HRA). See also proposed mitigation to the Policy GN 47 Water Quality and Protection of Water Resources (as proposed for amendment) which will require compliance against alongside Policy SP 15.	Yes - RWE are thought to own extensive land areas beyond the operational area.
SP 15	S/EMP/096/00002	Safeguarded Strategic Employment	Pembroke Dock cluster (Royal Dockyard)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
						sewerage systems, but it is difficult to get definitive evidence on this.		
SP 15	S/EMP/096/00003	Safeguarded Strategic Employment	Pembroke Dock cluster (West Llanion)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	
SP 15	S/EMP/096/00004	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock cluster (Ferry Lane)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	
SP 15	S/EMP/096/00005	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock cluster (Kingswood)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
						evidence on this.		
SP 15	S/EMP/096/00006	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock (Waterloo & London Road)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	
SP 15	S/EMP/096/00007	Safeguarded Strategic Employment	Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	There may also be potential for on-site mitigation opportunities.
SP 15	S/EMP/000/00004	Safeguarded Strategic Employment	Waterston Tank Farm, Dragon LNG, Milford Haven	Milford Haven	Pembrokeshire Marine inner - if sewered to Waterston Works it would flow directly (Cleddau)	Waterston Tank Farm and LNG, Milford Haven – likely to deal with most of its own waste generation on site.	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	Yes - understanding is the company owns extensive land areas beyond the

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
								operational area
SP 15	S/EMP/040/00011	Safeguarded Strategic Employment	Withybush cluster (East Estate)	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	There may also be potential for on-site mitigation opportunities.
SP 15	S/EMP/040/00012	Safeguarded Strategic Employment	Withybush cluster (North Estate)	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	There may also be potential for on-site mitigation opportunities.
SP 15	S/EMP/040/00015	Safeguarded Strategic Employment	Withybush cluster (Lodge Estate)	Crundale/Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW	See Mitigation proposed for S/EMP/095/00001 Pembroke Power Station.	There may also be potential for on-site mitigation opportunities.

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Mitigation	Potential for incorporation of mitigation within site
						are requiring this at Withybush.		

Mitigation Recommendations Safeguarded Routes Policy GN 36

Table 21 Recommended Mitigation for Safeguarded Routes

Reference	Scheme Name	Notes	Mitigation
TS/LDP2/03	Well Hill improvement, Pembroke	Within the catchment area	Add paragraph to the end of the reasoned justification of Policy GN 36 Transport Routes and Improvements: Individual proposals coming forward under policy GN 36 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven inner area of Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see also Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment).
TS/LDP2/05	Haverfordwest public transport interchange	Within the catchment area	

Integrity Test and Appropriate Assessment

Having carried out a screening assessment of the Local Development Plan, it is the Council's view that without mitigating measures a total of 5 strategic policies, 29 general policies, 38 housing allocations, 32 other allocations and 2 route safeguarding schemes within the Plan may lead to likely significant effects, in relation to the Pembrokeshire Marine SAC¹⁴ (area scoped in for assessing is the catchment area for the Milford Haven Inner part of the SAC shown in Figure 1 Map of affected area 5.22).

- 5.23. It was concluded that the Plan required appropriate assessment to test the Local Development Plan for its effects on the integrity of the Pembrokeshire Marine SAC. Article 6 (3) of the Habitats Directive states that a plan may only be agreed '...after having ascertained that it will not adversely affect the integrity of the site concerned.' Natural Resources Wales has advised that '*New developments leading to an increase in nitrogen discharges directly to, or catchments draining to these sites may contribute to unfavourable condition of, or undermine*

¹⁴ A number of ecological features designated for environmental protection including estuaries, coastal lagoons, large shallow inlets and bays and mudflats/ sandflats that are sensitive to high levels of nutrients. The updated condition assessments have concluded that nutrient sensitive features at some sites are in unfavourable condition.

measures to restore, these features. NRW advice is that: We therefore advise Planning Authorities that a conclusion of no adverse effect on site integrity may be drawn in a Habitats Regulations Assessment, where any plans or projects in these areas with the potential to increase nutrient discharges can secure appropriate mitigation and demonstrate nutrient neutrality for nitrogen.'

- 5.24. Table 22 Proposed Mitigation Measures - Impact Pathway for Nutrient below provides a summary of the mitigation measures considered necessary in order to avoid impacts to site integrity, and the Local Development Plan will need to ensure the delivery of such measures.
- 5.25. The Plan will need to be subject to nutrient budget calculations in line with the methodology provided by Welsh Government's for the All-Wales Nutrient Calculator.
- 5.26. Bespoke policy for all affected new development should ensure that development would only be permitted where appropriate investigations have identified the risk to the Milford Haven Inner Catchment of the Marine SAC, and a deliverable mitigation strategy is provided.
- 5.27. In addition, the Plan should include robust requirements for surface water and sub-surface drainage management within development sites. Any future policy should ensure that drainage requirements are considered at the design stage and developed and implemented in accordance with recognised standards.
- 5.28. Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment and elevation to become a strategic policy of the Plan provides robust requirements that all new affected development must ensure protection of surface waters and groundwater sources and must ensure appropriate treatment of surface waters and drainage, incorporating SuDS.
- 5.29. Further discussion is provided in Chapter 6 'Implications for the Local Development Plan' and Chapter 7 'Mitigation' on these mitigation measures and how they can be implemented to allow the competent authority to ultimately conclude that impacts to the Pembrokeshire Marine SAC sites' integrity will be avoided.

Table 22 Proposed Mitigation Measures - Impact Pathway for Nutrient Neutrality and Nitrogen

Mitigation Measures	Policy
Adoption of recommendations of Policy requirements for all new development to ensure protection of surface waters and groundwater sources and to ensure appropriate treatment of surface waters and drainage, incorporating SuDS wherever appropriate.	GN 3 Infrastructure and New Development – edits to criterion 11) and the reasoned justification. Policy GN 09 Employment Allocations – edits to the reasoned justification GN 10 Mixed Use Proposals – edit to the reasoned justification. Policy GN 16 Residential Allocations – paragraph added to reasoned justification. Policy GN 23 Specialist and Supported Accommodation Allocations paragraph added to reasoned justification. Policy GN 24 Gypsy and Traveller Site Allocations - add paragraph to the reasoned justification.
Policy requirement for all new development resulting in an increase in nitrogen discharges directly to, or catchments draining to Inner Milford Catchment to provide a nutrient budget and provide appropriate mitigation to ensure nutrient neutrality for nitrogen is achieved.	Policy GN 36 Transport Routes and Improvements edit to reasoned justification. GN 38 – Safeguarding and Prior Extraction of the Mineral Resource – edit to criterion 2) Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment (policy wording and reasoned justification) and elevated to Strategic Policy status. Policy GN 59 Waste Management Facilities:- add paragraph to the reasoned justification.

- 5.30. Providing the above mitigation measures are incorporated into the Local Development Plan are implemented successfully, adverse effects on the integrity of Pembrokeshire Marine SAC will be avoided.

In-combination Assessment

- 5.31. 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 Chapter 3 only category J would require further assessment of the potential for effects 'in combination'.
- 5.32. There is therefore no requirement for an in-combination assessment at this stage of the assessment.
- 5.33. The LDP2 was screened in alone for Appropriate Assessment. Mitigation measures were considered in the conclusions on adverse effect on the integrity of the sites, such as to fully mitigate for any effects.

Conclusion

5.34. Providing the above mitigation measures detailed in the Local Development Plan are implemented successfully, adverse effects on the integrity of the Pembrokeshire Marine SAC in terms of nutrient neutrality for nitrogen can be avoided.

6. Implications for the Local Development Plan

- 6.1. With just the policy framework recommended above the Council will still not be able to **demonstrate deliverability of sites** identified for development in the Local Development Plan.
- 6.2. NRW has advised¹⁵ that *‘there are tools available to assist undertaking the Habitats Regulations assessment namely the [Nutrient budget calculator | GOV.WALES](#)¹⁶ developed by WG which needs some refinement to be used geographically. The menu of [mitigation measures developed for both phosphorus and nitrogen mitigation-measures-menu.xlsx](#)¹⁷ provides a list of potential mitigation measures that can be used now, but is not an exhaustive list.’*
- 6.3. Opportunities can arise: on site, adjacent to sites or elsewhere in the catchment area. Corporately the Council is also committed to including consideration of its land holdings to assist. A Council scheme based on the management of suitable land creating ‘nutrient credits’ could be created. This would form the basis of an offsite offsetting scheme. These measures will be identified in collaboration with NRW and Dwr Cymru. The measures will include an estimated cost and land take requirement. More detail is provided in Chapter 7 Mitigation Measures – Implementation.
- 6.4. National legislation allows Local Planning Authorities to grant planning permission when they are satisfied that a proposal complies with national legislation and local development plan policies and to secure avoidance and mitigation through planning conditions and/or S106 legal agreements. Planning Policy Wales Edition 12¹⁸ advises: *‘Before authorising development or adopting a land use plan which is likely to have a significant effect on a SAC or SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an appropriate assessment of the implications for the designated features, consult NRW and have regard to NRW’s representations. The development can normally only be authorised or the plan adopted, if the planning authority ascertains that it will not adversely affect the integrity of the site, if necessary taking into account any additional measures, planning conditions or obligations.’*
- 6.5. Conditions should only be used when they satisfy 6 tests¹⁹, which require them to be necessary; relevant to planning; relevant to the development to be permitted; enforceable; precise and reasonable in all other respects. Mitigation which may

¹⁵ Letter from NRW to 20 August 2025 to Swansea City Council

¹⁶ <https://www.gov.wales/nutrient-budget-calculator>

¹⁷ [https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.gov.wales%2Fsites%2Fdefault%2Ffiles%2Fpublications%2F2023-10%2Fmitigation-measures-menu.xlsx&wdOrigin=BROWSELINK\\pccstorage2\cfs\\$\Development Plans 2009\07 Development Plans - PCC LDP 2\14 LDP 2 - Examination\Nitrates\mitigation-measures-menu.xlsx](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.gov.wales%2Fsites%2Fdefault%2Ffiles%2Fpublications%2F2023-10%2Fmitigation-measures-menu.xlsx&wdOrigin=BROWSELINK\\pccstorage2\cfs$\Development Plans 2009\07 Development Plans - PCC LDP 2\14 LDP 2 - Examination\Nitrates\mitigation-measures-menu.xlsx)

¹⁸ <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf>

Extract from paragraph 6.4.29

¹⁹ <https://www.gov.wales/sites/default/files/publications/2019-05/the-use-of-planning-conditions-for-development-management-wgc-0162014.pdf>

be required off site may involve land that is not within the control of the applicant, or requires the consent or authorisation of another person or body will usually fail the tests of reasonableness and enforceability. It is however possible to achieve a similar result using a condition worded in a negative form (Grampian condition). This could for example prohibit occupation until a specified action has taken place. Such conditions should not be used where there are no prospects at all of the action in question being performed within the time-limit imposed by the permission.

Figure 3 Grampian Condition Example

The Grampian condition proposed is as follows:-

The development hereby permitted shall NOT BE OCCUPIED until:

- a) A water efficiency calculation which demonstrates that no more than 120 litres of water per person per day shall be consumed within the development, and this calculation has been submitted to and approved in writing by the Local Planning Authority.
- b) A mitigation package addressing the additional nutrient input arising from the development has been submitted to, and approved in writing by the Local Planning Authority. The mitigation package shall address all of the additional nutrient load imposed on protected European sites by the development and be implemented in full prior to first occupation and shall allow the Local Planning Authority to ascertain on the basis of the best available scientific evidence that such additional nutrient loading will not have an adverse effect on the integrity of the protected European Sites, having regard to the conservation objectives for those sites; and
- c) All measures forming part of that mitigation have been secured and submitted to the Local Planning Authority.

Reason: To accord with the Conservation of Habitats and Species Regulations 2017, and Policy SP 12, GN3, GN 41 and GN 47 of the Pembrokeshire Local Development Plan 2.

- 6.6. Collecting financial contributions towards mitigation solutions would need to be by S106 obligation which will be delivered either by the Council or in partnership with another agency. A Heads of Terms used by Winchester City Council can be found in Appendix 3 Winchester City Council 106 Terms' for reference.
- 6.7. Potentially planning applications would no longer be held back, as a Grampian condition could be used, although development itself is generally still constrained for the reasons described in para 6.5 above.
- 6.8. Some landowners may come forward with proposals to change land in their control so as to create 'nutrient credits'. The Council will need to develop its own initiatives, particularly for its council home-building programmes, which

could include acquiring mitigation land, using land already in its ownership and retrofitting the council owned properties to reduce water consumption.

- 6.9. While these initiatives may help some authorities and developers, where they control suitable land, have a relationship with landowners, or can create/purchase credits, this type of solution may not be available for all applicants, even when up and running, especially smaller housebuilders. A more strategic scheme is needed.
- 6.10. As the Council is expected to be guided by a strategic Plan led approach the right choice of sites in the right locations is already one of the key drivers of providing a Plan led approach. The issue with nitrogen is such that they raise issues for whole settlements; it is not a matter of picking a different site at the same settlement. The issue remains for all sites in that river catchment. Progressing focuses minds on achieving solutions and PCC now has the experience of phosphates and the wider strategically developed support via the West Wales Nutrient Management Board.
- 6.11. Looking at progress on initiatives elsewhere (a similar issue regarding nitrogen can be found to have emerged for England Council's recently) the table below identifies the timelines experience before planning applications and proposals were seen to move on from being in a holding pattern.

Table 23 Examples of timelines for introducing Mitigation Packages

LPA (timeline)	Natural England Announcement	Position Statement	Strategic Mitigation Package Commencement
Winchester City Council = 8 months to Grampian condition = 1 year to mitigation package	Natural England published advice for Local Planning Authorities on 2nd June 2019 which sets out the requirement for all new development in the Solent region to achieve nitrate neutrality.	February 2020 – allows permissions to be granted with Grampian condition	July 2020 It was agreed that the council could start to collect financial payments from developers
New Forest District Council – = 3 months to Grampian condition = 1 year to mitigation package = 13 months – call for sites	“	September 2019 – allows permissions to be granted with a Grampian condition.	July 2020 – following the adoption of their Local Development Plan, by way of Policy ENV1, it was agreed that a financial contribution or other appropriate mechanisms could be used to achieve nutrient neutral development.

LPA (timeline)	Natural England Announcement	Position Statement	Strategic Mitigation Package Commencement
			November 2020 – The Council issued a call for project sites for biodiversity net gain and nutrient mitigation to start an offsetting scheme.
Portsmouth City Council = 5 months to Interim Strategy. = 21 months to update with HIOWWT.	“	November 2019 – Mitigation Option 1: Offsetting against the existing lawful land use (water use) on an application site, extant permissions or other land controlled by the applicant; and/ or Mitigation Option 2: Other bespoke direct and indirect mitigation measures, agreed in discussion with the Council and Natural England, such as Sustainable Urban Drainage Systems (SUDS), interception or wetland creation; and/ or o Mitigation Route 3: Purchasing of 'mitigation credit' from the control of, and water efficiency improvement works to, the Council's own property assets or other recognised source of 'credit' in perpetuity.	8 th February 2022 – Presentation to Cabinet seeking approval for the nitrogen mitigation scheme in partnership with Hampshire and Isle of Wight Wildlife Trust (HIOWWT). Mitigation Option 3 was subsequently amended following the development of a 'nature-based solution' with the Hampshire and Isle of Wight Wildlife Trust, acquiring intensively managed farmland.
Breckland District Council – 19 months for mitigation package.	Natural England published advice for Local Planning Authorities on 16 th March 2022 requiring nutrient neutrality in the River Wensum SAC.	Presented to Cabinet in March 2023 recommending the Council co-establish and join the Joint Venture Company, Norfolk Environmental Credits with other affected councils.	October 2023, Norfolk Environmental Credits (NEC) launched. Not-for-profit, joint venture company established by a partnership of Councils, where developers buy credits and environmental schemes benefit from the investment generated by the sale of credits.

- 6.12. The Council understands that in terms of the ‘polluter pays’ principle and how ‘fair share’ should be addressed further work on source apportionment is being undertaken by DCWW targeted specifically on the Milford Haven Inner and Burry Inlet and that 2027 has been mooted as the year when this could be published. This could mean that with the benefit of the results of apportionment that nutrient neutrality is no longer a requirement.
- 6.13. In the meantime, while further and more detailed investigations are undertaken by Natural Resources Wales and Dwr Cymru the precautionary principle of nutrient neutrality for nitrogen is mandated. Without a firm knowledge of the timescales the Council has no alternative but to engage with and seek to address nutrient neutrality now whether it be for day-to-day development management purposes under Local Development Plan 1 or to deal with deliverability issues for allocations in Development Plan 2.
- 6.14. It is also useful to consider that it may be that future requirements for nutrient neutrality are introduced in other areas. Perhaps the most responsible approach for forward planning is to seek to include a policy that sets out how the Council will deal with nutrient neutrality as set out from paragraph 5.8 above.

Housing Delivery

- 6.15. The County Council has sought to establish the extent to which the occupancy of new homes is likely to contribute to the release of nitrogen into the affected catchment each year.
- 6.16. LDP 2 Deposit 2 provides for 6,470²⁰ dwellings to facilitate the Housing Requirement of 5,840 new dwellings up to the end of 2033. As of April 2023, the estimated portion of the land supply potentially affected by the NRW announcement is shown in the Table below.

²⁰ see Table A Housing Land Supply in Appendix A of the Local Development Plan 2 Deposit 2 (with Focussed Changes and consequential edits shown)

Table 24 Housing Land Supply Affected

	Number of housing units	Potentially affected by Nitrogen Issues	% Affected
Completed	2,017	0	0%
Under Construction	233	0	0%
Units with Planning Permission	898	133	15%
Allocations	2,375	1,615	68%
Large Windfall (Urban)	220	162	74%
Large Windfall (Non-Urban)*	88	57	65%
Small Windfall in settlements *	572	369	65%
Small Windfall in countryside**	68	40	59%
Totals	6,471	2,376	37%

* Using an estimate of windfall per settlement as locations not specified

** Using an estimate of windfall and the proportion of LPA land within affected catchment

6.17. From a total of potential housing land supply of 6,471 residential units an estimated 2,376 dwellings (37% of the potential land supply) is used as a baseline figure to scope out what nitrogen load is expected and what mitigation might be required and to gauge whether this is deliverable.

Surface water emissions

6.18. From 7th January 2019²¹, all new developments of more than 1 dwelling house or where the construction area is 100 square meters or more, require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role, before construction work begins.

6.19. The Construction Industry Research and Information Association (CIRIA) has published a guide: Using SuDS to reduce nitrogen in surface water runoff (2023). This is intended for areas where nutrient neutrality is required. The guide outlines the design criteria for a good SuDS scheme that can maximise the opportunity to capture and remove nitrogen. It can be assumed, therefore,

²¹ Sustainable Drainage (SuDS) Statutory Guidance For local authorities on the implementation of Schedule 3 to the Flood and Water Management Act 2010, the mandatory use of SuDS on new developments and approval and adoption by the SuDS approving body (the SAB)
<https://www.gov.wales/sites/default/files/publications/2019-06/statutory-guidance.pdf>

that leachate rates from new residential development will be addressed as a consequence of the mandatory requirements to provide SuDS.²²

- 6.20. Looking to evidence as to the impact of SuDS impacts are framed as positive in terms of improving water quality. *‘1.1.2 Water quality performance - The philosophy behind SuDS is that they also treat the surface water runoff often improving water quality as well as provide a drainage system. This is the main difference between traditional drainage systems based on the use of pipework and the SuDS philosophy. In general, the use of SuDS components, especially if a SuDS management/treatment train is used, can result in runoff water quality which is of a similar order to river water quality standards (HR Wallingford, 2003). This area of research in SuDS is continually evolving with research being undertaken particularly in Australia on the benefits of biofiltration.’*²³
- 6.21. However, the publication ‘Construction Industry Research and Information Association [CIRIA] (2023). Using SuDS to reduce nitrogen in surface water runoff’ advises in chapter 1 that it will never be possible to capture all nutrients in the SuDs scheme, especially for nitrogen, so there will always be a small residual load of nutrients to be offset by the developer, elsewhere on the development or off site. Nitrogen is particularly difficult to manage in SuDs because it exists in different forms, alters from one form to another depending on conditions and requirements specific conditions to support treatment processes. Chapter 8 of the publication advises that *‘Where the SuDS management trains described in Option 1 and 2 (Sections 7.1 and 7.2) are designed in accordance with CIRA C753 and where full treatment is provided for all sub annual rainfall events, these schemes can be considered to capture and remove 30% of the nitrogen in the run off from the development as an average over the year.’*²⁴

Figure 4 Extract from ‘Construction Industry Research and Information Association [CIRIA] (2023). Using SuDS to reduce nitrogen in surface water runoff’

Option1: Ponds Followed by Bioremediation Devices: Good nitrogen removal can be delivered by first including a device with a permanent pool of water, followed by devices that provide aerobic biological activity such as a bioremediation or bioswale/wetland channel. If it is easier this can be multiple small ponds across the development. The inclusion of a sediment removal device to protect the permanent pool from excess sedimentation is essential for each pond; this can be delivered using a sediment forebay or a manufactured sediment separator.

²² Construction Industry Research and Information Association [CIRIA] (2023). Using SuDS to reduce nitrogen in surface water runoff

²³ https://www.susdrain.org/files/resources/evidence/overview_of_suds_performance_2009_.pdf Overview of SuDS performance Information provided to Defra and the EA Draft Report CIRIA October 2009

²⁴ The performance of SuDS is extremely variable and dependent on the detailed design and the physical characteristics of the site. The figure of 30% is being used as a high-level assumption input for the calculator based on the findings of the CIRIA report.

Option 2: Lined infiltration devices, followed by a pond: If designers want to stick with a more common treatment train approach, but they want to maximise nitrogen capture and removal, they can include permeable surfaces, bioretention zones, tree pits and wetland channels/bioswales with lining underneath them, and then direct the subsurface discharge and overflows to a pond at the bottom of the system.

- 6.22. A report must be developed with applications coming forward to demonstrate how the development will achieve nutrient neutrality, often through the use of SuDS. This assessment will lead to a detailed design for the chosen SuDS, which will form the basis for cost estimations. Engineers specializing in wastewater and drainage will be needed to design the system and provide accurate costings.
- 6.23. Paragraph 5.30 of the Financial Viability Report compiled from and based upon High-Level Financial Viability Appraisals undertaken by Burrows-Hutchinson Ltd and Key Candidate Site Viability Assessments undertaken in July 2024²⁵ advises:
- ‘5.29 Accordingly, whilst the high-level assessments in this Study contain an allowance for normal S.106 obligations and SuDS requirements, which a developer can anticipate from the policies in the LDP and any relevant Supplementary Planning Guidance, they do not make allowance for “abnormal” obligations. The cost allowances made in this Study are recorded in Appendix D and have been calculated as follows: a) £1,500 per dwelling for SuDS adoption costs. The Pembrokeshire SAB currently have no record of a commuted sum being taken for any residential development; and natural infiltration rates are good in many parts of the County. Nevertheless, it was considered appropriate to make a modest (rather than nil) allowance in the high-level Countywide viability assessments for such costs.’*
- 6.24. The Financial Viability Report identifies that an allowance of £1,500 per dwelling is included in the Assessment as an allowance for SuDS. It also includes a 5% contingency allowance all construction & physical infrastructure costs. It also identifies where there is a potential to have surplus on anticipated profits. These allowances and surplus profit can assist with the provision of nutrient neutrality for sites. Until detailed layout proposals come forward for sites the exact requirements and costings for sites can only be an estimate.

Figure 5 Factors Influencing SuDS Costs for Nitrogen Neutrality

Site-Specific Design: The type and size of SuDS required vary based on the development's specific needs and the existing site conditions.

Mitigation Strategy: The chosen approach, such as creating wetlands or using specific engineered treatment systems, significantly impacts the cost.

²⁵ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> See under ‘Housing Viability’

Capital vs. Operational Costs: There are both upfront capital costs for construction and ongoing operational costs for maintenance and inspection of the systems.

Complexity: More complex systems or multiple units will increase the overall investment required.

Residential Foul water emissions

6.25. Using the All-Wales Nutrient Calculator the following table sets out the likely nutrient budget for housing allocations.

Table 25 Housing Allocations (Policy GN 16) Estimated sum of Nitrogen Budget

Row Labels	Sum of Total Units to be delivered in Plan period	Sum of Nitrogen budget + 20% buffer: kg TN/year will be generated
Begelly	46	180.23
Clarbeston Road	19	80.06
Clunderwen	31	119.96
Crundale	37	134.94
Haverfordwest	403	1440.32
Hill Mountain	15	52.22
Hundleton	14	47.51
Jeffreyston	10	96.79
Johnston	63	276.15
Keeston	27	98.32
Kilgetty	19	59.9
Lamphey	95	334.26
Letterston	38	134.27
Llandissilio	26	81.97
Llangwm	66	250.81
Llanstadwell	10	35.32
Maenclochog	15	73.44
Milford Haven	14	1.79
Narberth	89	301.6
Neyland	101	330.8
Pembroke	285	966.66
Pembroke Dock	139	476.94
Robeston Wathen	5	44.86
Simpson Cross	18	60.35

Row Labels	Sum of Total Units to be delivered in Plan period	Sum of Nitrogen budget + 20% buffer: kg TN/year will be generated
Spittal	10	37.81
Tiers Cross	6	1.02
Wolfscastle	14	49.66
Grand Total	1615	5767.96

- 6.26. Applying an overall estimated 30% reduction for SuDS incorporation (see paragraph 97 above) this load can be reduced to an estimated 4,984.23 kg. There is insufficient detail available to apply a tailored figure for SuDS incorporation on individual sites at this point.

Residential Commitments

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

Table 26 Housing Commitments (Policy GN 17) Sum of Nitrogen Budget

Allocation Name	LDP Reference	Commitment Units Remaining in plan period	Development proposal (number of additional units):	Nitrogen budget + 20% buffer: kg TN/year will be generated
Calvary Church	040/00373	8	8	26.93
Snooker Club	040/00430	8	8	25.87
Land N of Cleddau Bridge Hotel	096/00274	2	3	14.33
Land N of Cleddau Bridge Hotel	096/00375	7	7	42.42
Green Haven, Monkton	095/00180	11	11	47.54
Springfield	095/00240	2	1	6.48

Allocation Name	LDP Reference	Commitment Units Remaining in plan period	Development proposal (number of additional units):	Nitrogen budget + 20% buffer: kg TN/year will be generated
Rushacre Gardens	088/00077	1	1	48.95
Dingle Farm	088/00074	16	16	50.44
North of New Road	003/00040	35	35	121.34
South of Tinker's Fold	025/00028	4	5	25.97
Dingle Lane	029/00013	1	1	4.46
Woodholm Farm	029/00026	2	3	15.2
Leven Close	044/00050	1	1	5.36
Cyfin Barn Farm	044/00063	3	4	13.88
Harcourt Close	044/00015	14	5	24.65
Maes Roslyn	081//LDP/01	13	4	20.75
Sageston Fields	015/00022	7	7	24.82
Hawn Lake	011/00011	1	1	3.82
Land to the S of Kiln Park	012/00004	6	2	40.58
Barnlake Point	154/00001	1	10	56.3
	Totals		133	620.09

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

Table 27 Windfall - Nitrogen Budget

	Number of housing units	Potentially affected by Nitrogen Issues	% Affected
Large Windfall (Urban)	220	162	74%
Large Windfall (Non-Urban)*	88	57	65%
Small Windfall in settlements *	572	369	65%
Small Windfall in countryside**	68	40	58.82%
		628	dwelling
	23 dph	27.30	Ha

6.30. The nutrient budget calculator using the windfall dwellings affected total (628 dwellings) with an average estimate of 23 dwellings per hectare figures to calculate a land area (27Ha) results in an estimated 2,383.66 kg TN/year without SUDS or 2172.96 kg TN/year with 30% SuDS.

Delivery of Allocations 'other than' Housing

6.31. Table 28 All other Allocations below lists all the other allocations from the Plan which are likely to generate wastewater (solar array allocations are screened in as a precautionary principle) and therefore are likely to have a significant effect. This shows how dominant the issue is for Plan delivery (66%).

6.32. Given that the implications of wastewater treatment for many of these sites is uncertain these sites will need to be considered on a case-by-case basis in terms of likely implications. Some have private treatment and extensive areas for mitigation to be considered on site. Gypsy Traveller sites can be estimated more accurately – see Table 29 below.

Table 28 All other Allocations Summary Table Screened in 'Yes' or 'No'

Screened In Yes or No Allocations Other than Housing					
Count of Allocation/Type	No	Yes	Grand Total	% No	% Yes
Community Facility	1		1	100%	0%
Employment	3	6	9	33%	67%
Gypsy Site	1	3	4	25%	75%
Mixed Use	1	1	2	50%	50%
Safeguarded Strategic Employment	5	11	16	31%	69%
Solar Array		2	2	0%	100%
Strategic Employment	3	5	8	38%	63%
Supported Accommodation	2	2	4	50%	50%
Waste Management		1	1	0%	100%
Grand Total	16	31	47	34%	66%

Table 29 Gypsy Traveller Allocations (Policy GN 24) Sum of Nitrogen Budget

Site Name	Drain into Milford Haven inner	Settlement	Total Units to be delivered in Plan period	Nitrogen budget + 20% buffer: kg TN/year will be generated
West of Kingsmoor Common Gypsy and Traveller site	Yes	Begelly	11	47.51
East of Withybush Gypsy and Traveller site	Yes	n/a	5	56.12

Site Name	Drain into Milford Haven inner	Settlement	Total Units to be delivered in Plan period	Nitrogen budget + 20% buffer: kg TN/year will be generated
South of Monkton Playing Fields	Yes	Pembroke	15	56.17
Grand Total			31	159.8

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

7. Mitigation Measures – Implementation

7.1. Mitigation measures will be required as a way of addressing the results of the nutrient calculator where a net nitrogen figure is calculated.

7.2. Natural Resources Wales advises on its website²⁶ regarding mitigation:

What are the principles of nutrient neutrality

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

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

²⁶ <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/principles-of-nutrient-neutrality-in-relation-to-development-or-water-discharge-permit-proposals/?lang=en>

Permissions will not be granted unless the competent authority is satisfied that the SAC will not be impacted.

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

- 7.3. Below in Table 30 Natural Resources Wales Mitigation Measures is a summary of mitigation measures that Natural Resources Wales have advised upon for using in the Mitigation Measures Menu.
- 7.4. The full spreadsheet can be found in Appendix 5 Mitigation Measures Menu – see separate spreadsheet.
- 7.5. The spreadsheet advises that: *“This is a list of potential mitigation measures which does not mean NRW will accept all of these measures to be used for Nutrient Neutrality. Therefore, mitigation measures for any scheme will be assessed on a case-by-case basis, considering site specific conditions, meeting the Nutrient Neutrality Principles, and ensuring the correct permissions and regulatory requirements will be in place.”*
- 7.6. There may be opportunities in the same land ownership of the developer/applicant and within the same catchment that could possibly be used to provide such mitigation.

Table 30 Natural Resources Wales Mitigation Measures

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate	
Free Water Surface Wetlands / Integrated Constructed Wetlands	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	Total Nitrogen	Up to 80%
Vertical Flow Wetlands	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	Total Nitrogen	20-40%
French Vertical Flow Wetlands	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	Total Nitrogen	20-60%
Horizontal Flow Wetlands	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	Total Nitrogen	30-50%
Waste Stabilisation Ponds	ARUP	Yes	No NRW policy	May need an Environmental Permit	Facultative Ponds: BOD5 - 40-56%; COD - 30-40%; Suspended Solids - 20-40%; Total Nitrogen - <40%; Total phosphorus - <25%; Ammonia - <50%; Coliforms - 90-99% Anaerobic - Facultative Ponds: BOD5 - 75-85%; COD - 65-80%; Suspended Solids - 70-80%; Total Nitrogen - <60%; Total phosphorus - <35%; Ammonia - <50%; Coliforms - 90-99% Facultative Aerated Ponds: BOD5 - 75-85%; COD - 65-80%; Suspended Solids - 70-80%; Total Nitrogen - <30%; Total phosphorus - <35%; Ammonia - <30%; Coliforms - 90-99% Complete Mix Aerated - Sedimentation Ponds: BOD5 - 75-85%; COD - 65-87%; Suspended Solids - 80-87%; Total Nitrogen - <30%; Total phosphorus - <35%; Ammonia - <30%; Coliforms -	

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate	
					90-99% Anaerobic Facultative Maturation: BOD5 -80-85%; COD - 70-83%; Suspended Solids - 73-83%; Total Nitrogen - 50-65%; Total phosphorus - >50%; Ammonia - >50%; Coliforms - >99.99%	
Algae Treatment					Efficiency of nutrient removal rate dependant on wastewater source as follows: <u>Municipal sewage water</u> : total phosphorus - 51-89%; total nitrogen - 82-94% <u>Produced water</u> : total phosphorus - 73%; total nitrogen - 92% <u>Agro-industrial wastewater</u> : total phosphorus - 13-70%; total nitrogen - 34-49% <u>Pharmaceutical wastewater</u> : total phosphorus - 82-92%; total nitrogen - 70-74% <u>Landfill leachate</u> : total phosphorus - 93-100%; total nitrogen - 30-90% <u>Aquaculture wastewater</u> : total phosphorus - 83-99%; total nitrogen - 49-86% <u>Aqueous phase wastewater from biomass to energy generation process</u> : total phosphorus - 95-98%; total nitrogen - 60-99% <u>Wastewater from mines</u> : total phosphorus - 83%; total nitrogen - 97% Metal removal rates: Cadmium: 33-73%; Chromium: 51-93%; Copper: 72-96%; Lead: 66-89%; Mercury: 35-97%; Nickel: 33-97%; Zinc: 40-98%	
	ARUP	Yes	NRW CW Policy	May need an Environmental Permit		
Reed Beds	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	Total Nitrogen	91%
Willow Systems	ARUP	Yes	NRW CW Policy	May need an Environmental Permit	Total Nitrogen	85-100%

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate
Ferric dosing	ARUP	No	No NRW policy	Permitting requirements will be scheme specific	Phosphorous only listed
Private Treatment Systems	ARUP	Further evidence needed	No NRW policy	Permitting requirements will be scheme specific dependent on the types of activity	Phosphorous only listed
Improvements in WWTW	Natural England	No	N/A	N/A	
Package Treatment Plants connecting to mains	Natural England	No	N/A	N/A	
Land Use/Practice-Changes	ARUP	Yes	No NRW policy	EPR Permit not required	<u>Agroforestry</u>: total phosphorus - 5-72% <u>Cover crops</u>: total phosphorus - 0-0.13 kg ha-1 year-1, or 108 kg P year-1 <u>Land-use change</u>: total phosphorus - 0.18-0.5 kg ha-1 year-1 (cropland to wetland); total nitrogen - 12.8-93% removal (cropland to wetland) <u>Cessation of fertiliser / organic material application</u>: total phosphorus - 0.03-0.5 kg ha-1 year-1
Field boundary management	ARUP	Yes	No NRW policy	Permitting requirements will be scheme specific	<u>Riparian buffer</u>: total phosphorus - 31-99% removal (depending on width), total nitrogen - 10-99% (depending on width) <u>Field margin or forestry buffers</u>: total phosphorus - 11-95%; nitrogen (as nitrate) -25-100%; sediment - 29-100% <i>Removal rates will be dependent on many variables including location, soil and crop type etc.</i>
Urban Sustainable Drainage Systems	ARUP	Yes	No NRW policy	Permitting requirements will be scheme specific	<u>Swale</u>: total phosphorus - 20-55%; total nitrogen - 50%; total suspended solids - 50-80%; heavy metals (lead, zinc, copper) - 31-83%

Mitigation Measure	Source	Potential for Nutrient Neutrality	NRW Policy	Permitting Requirement	Nutrient Removal Rate
					<u>Detention basins</u>: total phosphorus - 60-99%; total nitrogen - 85-90% <u>Pervious surfaces</u> (results for the surface soil layer): total phosphorus - >75%; total nitrogen (organic) - 70-80%; Heavy metals (lead, zinc, chromium) - 45-97% <u>Filter strips</u>: total phosphorus - 38%; nitrogen (as nitrate) - 10%; total suspended solids - 71%; heavy metals (zinc, lead) - 25-51% <u>Bioretention systems</u>: total phosphorus - 80-90%; total suspended solids - 80-90%
Rural Sustainable Drainage Systems	ARUP	Yes	No NRW policy	Permitting requirements will be scheme specific	Spreadsheet not populated
River Restoration	ARUP	Further evidence needed	No NRW policy	FRAP or Ordinary Watercourse Consent	Spreadsheet not populated
Drainage Ditch Blocking	Ricardo	Dependent on nutrient	No NRW policy	Ordinary Watercourse Consent	Spreadsheet not populated
Engineered Logjams	Ricardo	Dependent on nutrient	No NRW policy	Ordinary Watercourse Consent	
Terrestrial Sediment Traps	Ricardo	Yes	No NRW policy	Ordinary Watercourse Consent	

- 7.7. The Council is also commissioning work on a mitigation package to assist applicants. At the time of writing, the Chief Executive of the Council has given his 'in principle' support to these proposals. A report seeking the buy-in of Cabinet to these proposals was considered and approved on the 6th of October 2025.²⁷ Elements of the emerging brief are set out below:

Table 31 Elements of Council Brief – Mitigation Package -Draft

Completing a Natural Capital Accounting process on the county farm estate to identify where and what type of mitigation could be applied for multiple benefits. This could be extended to Pembrokeshire wide for a longer-term strategy if resources were available. This would include the preparation of a Nutrient Neutrality Mitigation Strategy for each farm holding the components of which would include:

Stage 1 – Screening: Confirm the farm is in the nutrient neutrality catchment area and draining into the affected catchment.

Stage 2 – Nutrient Budgets: Prepare nutrient budget calculation for the farm as currently used - calculation of nitrogen output using current land uses per land parcel– using the All-Wales Nutrient Calculator methodology. A GIS based analysis is needed. Current land use identified (using a recognised Farm Classification System)

Stage 3 – Mitigation: A full and detailed assessment of each individual land parcel to determine if any land is suitable for mitigation – verify how each land parcel is draining into the affected catchment. Use GIS analysis to verify using contour data generated at 2m intervals to determine slope angle and water catchment at a micro level. The resultant channel flow data can be used to indicate surface water flow direction following precipitation. Identify mitigation opportunities using a GIS system. There are several types of offsite mitigation to consider when reducing nitrogen use. Mitigation opportunities can range from taking land out of agricultural use to adjusting and adapting parts of the land holding for mitigation purposes. Opportunities for habitat creation or planting riparian buffers on an existing holding can also be beneficial. Establishing wetlands or maintaining some fallow land could also offer significant benefits in reducing nitrogen loads. Some woodland planting is also a satisfactory option to lower nitrogen loading on existing land used for agricultural production. It is also possible to reduce the yearly nitrogen load by changing farming practices. For example, intensive enterprises such as pig or poultry production have a much greater yearly nitrogen load than grazing cattle or sheep. Although this could be an option to consider, it is important to be cautious as it would be difficult to guarantee a long-term solution that satisfies the HRA especially as mitigation measures must be in place for the duration of the development, which is considered generally as 80 to 125 years. Ideas for mitigation can also be found by using the Green Infrastructure Plan prepared by the County Council which would provide an opportunity to achieve multiple aims. Use the All-Wales Nutrient Calculator and NRW's Mitigation Menu to assist with calculations. To note: It is important to distinguish between

²⁷ <https://mgenglish.pembrokeshire.gov.uk/documents/s81147/1.5%20-%20Cabinet%20Report%20Nutrient%20Neutrality%20update%201.pdf?LLL=0>

the general duty under Article 6(2) and the project-specific assessment process under Article 6(3) of the Habitats Regulations. Article 6(2) imposes a continuous obligation on Pembrokeshire County Council, as a Competent Authority, to avoid deterioration and disturbance of European sites, regardless of whether a specific plan or project is proposed.

Stage 4 - (can be carried out alongside Stage 3): Review the draft mitigation proposals against potential environmental constraints to ensure no significant adverse effect on the environment (constraints checking against, for example, nature conservation and heritage designations).

Stage 5 - Quantify the mitigation reduction that can be achieved in nitrogen kgs reduction per hectare per year.

Stage 6 - Implementation: Identify the implementation strategy and cost including ongoing management requirements plus proposed activation dates.

- 7.8. The total Council owned farmland available for consideration for use as part of a nutrient mitigation package in the affected catchment is an estimated 1,311 hectares. Part of the brief will be to review that landholding's availability and suitability to contribute to a mitigation scheme. Initial scoping has been positive where a farm within the catchment with an immediate potential change of land use types of dairy to lowland grazing for example could achieve a 1671.56 kg TN/year using the 'All Wales Nutrient Neutrality Calculator'.

Table 32 Change over from Dairy to Lowland Grazing – Council owned farm example.

Area (hectares)	Pre-existing Landcover	Pre-Nitrogen load (kg TN/year)	New landcovers	New Nitrogen load (kg TN/year)	Reduction (kg TN/year)
47.42	Dairy	2528.91	Lowland grazing	857.35	1671.56

- 7.9. By way of example using the total estimated mitigation required for the affected housing allocations see paragraph 6.26 above the load requirement for mitigation of 4,984 kg TN/year would require the equivalent of 96 hectares of dairy (4984/51.64) or 324 hectares of lowland grazing to be changed over to woodland to meet the requirements (4984/15.39).

Table 33 Estimated Nitrogen Load Reductions Per hectare using the All Wales Nutrient Calculator

Pre-existing Landcover	PreNitrogen load (kg TN/year)	New landcovers	New Nitrogen load (kg TN/year)	Reduction (kg TN/year)
Dairy	54.64	Woodland	3	51.64
Lowland grazing	18.39	Woodland	3	15.39
Less Favoured Area grazing	10.62	Woodland	3	7.62

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

Table 34 Estimated Nitrogen Load Reductions mitigation summary for riparian buffers using the NRW Mitigation Measure Menu²⁸

Landcover (1Ha)	Nitrogen load per Ha(kg TN/year)	Min. Nutrient Reduction Riparian buffer(10% removal) (kg TN/year) *	Max. Nutrient Reduction Riparian buffer (99% removal) (kg TN/year)*	Min. Nutrient Removal Field margin or forestry buffers (25% removal)(kg TN/year)**:	Max. Nutrient Removal Rate Field margin or forestry buffers (100% removal) (kg TN/year)**
Dairy	54.64	5.46	54.09	13.66	54.64
Lowland grazing	18.39	1.84	18.21	4.60	18.39
Less Favoured Area grazing	10.62	1.06	10.51	2.66	10.62
Mixed	22.55	2.26	22.32	5.64	22.55
General cropping	9.11	0.91	9.02	2.28	9.11
Cereals	16.73	1.67	16.56	4.18	16.73
Horticulture	12.44	1.24	12.32	3.11	12.44
Poultry	55.27	5.53	54.72	13.82	55.27
Outdoor pig farming	34.65	3.47	34.30	8.66	34.65

*Riparian buffer: total nitrogen - 10-99% (depending on width) Removal rates will be dependent on many variables including location, soil and crop type etc.

**Field margin or forestry buffers: nitrogen (as nitrate) -25-100% Removal rates will be dependent on many variables including location, soil and crop type etc.

²⁸ Removal rates based on the NRW Mitigation Measure Menu <https://www.gov.wales/river-pollution-summit-action-plan>

Nutrient Management Boards

7.10. Regarding the three Nutrient Management Plans²⁹, these are putting in place practical measures to help improve the quality of river water in the three West Wales Riverine (non-tidal) SACs – those for the Teifi, Cleddau and Tywi. Part of the Teifi catchment is in Pembrokeshire and most of the Cleddau catchment is in Pembrokeshire. A Nutrient Management Plan has been prepared for each of the three catchments and each is expected to be published shortly on the joint NMB website. This website currently lists (September 2025) potential mitigation measures, albeit primarily in a phosphate context. The joint NMB is under common management and as well as each Board there is an established stakeholder group and various technical advisory groups (TAGs). Funding of NMBs comes from a range of sources, including Welsh Government.

²⁹ [Nutrient Management Board Website https://www.wnmb.wales/](https://www.wnmb.wales/)

8. Appendix 1 Screening

Table 35 introductory chapters, vision and objectives

Element of plan	Assessment and rationale	Category	Screening conclusion
Introductory Section and Chapter 1 Context and Key Issues	Administrative text, Background and Context	A	Screened out
Vision	General aspirations for the Plan area	A	Screened out
LDP Objectives A-K			
A) Mitigate and respond to the challenge of Climate Change.	General statement	A	Screened out
B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.	General statement, however, there may be potential effects – implications assessed under subsequent policies	A	Screened out
C) Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises	General statement, however, there may be potential effects – implications assessed under subsequent policies	A	Screened out
D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	General statement, however, there may be potential effects – implications assessed under subsequent policies	A	Screened out
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

Element of plan	Assessment and rationale	Category	Screening conclusion
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 ³⁰ 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

Table 36 Strategic Policies Screening

Policy Reference	Screening Category	Notes	Screen In
SP 01: 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. Other more detailed policies can be found in the Plan.	No
SP 02: Housing requirement	A	Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. The housing allocations are screened separately under policy GN 16.	No

³⁰ Note that infrastructure includes mobile and broadband provision, transport improvements and sewerage capacity.

Policy Reference	Screening Category	Notes	Screen In
SP 03: Affordable housing Target	A	Screened out: This is a policy sets out a general policy statement. It is not spatially specific but could theoretically be relevant to proposals which might impact upon European sites. However, given that the strategic nature of the policy, the credible evidence of a real risk to European sites is low. It is considered that Policy SP 12, Policy GN 41 and Policy GN 47 will provide sufficient protection to avoid proposals coming forward which represent a risk to European sites. In view of Policy SP 12, Policy GN 41 and Policy GN 47 will have no conceivable effect on any European sites.	No
SP 04: 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.	Yes
SP 05: Supporting Prosperity	A	Screened out: This is policy sets out a general policy statement. It is not spatially specific but could theoretically be relevant to proposals which might impact upon European sites. However, given that the strategic nature of the policy, the credible evidence of a real risk to European sites is low. It is considered that Policy SP 12, Policy GN 41 and Policy GN 47 will provide sufficient protection to avoid proposals coming forward which represent a risk to European sites. In view of Policy SP 12, Policy GN 41 and Policy GN 47 will have no conceivable effect on any European sites.	No
SP 06: 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.	No
SP 07: 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.	No
SP 08: Regional Growth Areas	A	Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. In view of policy GN 41 and GN 47, policy SP 8 cannot undermine the conservation objectives of any European sites.	No

Policy Reference	Screening Category	Notes	Screen In
SP 09: Service Centres and Service Villages	A	Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. In view of policy GN 41 and GN 47, policy SP 9 cannot undermine the conservation objectives of any European sites.	No
SP 10: Local Villages	A	Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. In view of policy GN 41 and GN 47, policy SP10 cannot undermine the conservation objectives of any European sites.	No
SP 11: Countryside	I	Screened in – Although not spatially specific increased population increase generated nutrient waste leading to LSE in affected catchments.	Yes
SP 12: Maintaining and Enhancing the Environment	I	Screened In: DTA Handbook includes that - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12	Yes
SP 13: Port and energy-related Development and Celtic Freeport	B/H	Screened out: HRA is required for proposals brought forward under SP 13. 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 4.80, provides further advice on Habitats Regulations Assessment being required. Hence working alongside Policy GN 41 and GN 47, in particular, this policy provides sufficient protection. In view of policy GN 41 and GN 47, policy SP 13 cannot undermine the conservation objectives of any European sites. The reasoned justification specifically refers to 'no increase in nutrients in the Pembrokeshire Marine SAC.	No
SP 14: Strategic Employment Provision	I	Screened in: Project level HRA required for sites impacting Pembrokeshire marine SAC. This policy identifies strategic employment site allocations. The individual allocations are screened under Table 40 Other Allocations Screening. The policy allows for development of land for employment at locations where impacts on European sites are possible. Reference is made in paragraph 4.91 to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC which is helpful. The safeguards that are included in SP 13 regarding increases in nutrients are not also included here, however.	Yes

Policy Reference	Screening Category	Notes	Screen In
SP 15: Safeguarding of Existing Employment Sites	I H	Screened in - This policy identifies existing employment sites which are safeguarded under specific use classes. The individual sites are screened under Table 40 Other Allocations Screening. These safeguarded sites include parts of sites that have not been developed. However, the policy's reasoned justification (4.97) explicitly refers to the need to carry out a Habitats Regulations Assessments where sites have a potential to impact on the Pembrokeshire Marine SAC. The safeguards that are included in SP 13 regarding increases in nutrients are not also included here, however.	Yes
SP 16: Retail Hierarchy	F	Screened out: The policy is a strategic high-level policy setting out land use priorities with reference to later policies within the plan (see paragraph 4.101). 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.	No
SP 17: Visitor Economy	F	Screened out: The policy is a strategic high-level policy setting out land use priorities with reference to later policies within the plan (see paragraph 4.112). 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.	No
SP 18: 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.	No
SP 19: Welsh Language	G	Screened out: Policy does not impact upon conservation objectives of designated Sites	No
SP 20: Transport Infrastructure and Accessibility	F	Screened out: not likely to have a significant effect on an SAC in relation to nutrient inputs, as there is unlikely to be a source of additional nutrients or pathway for impacts. Safeguarded routes which are referred to in Policy GN 36 are considered separately.	No
SP 21 Waste Prevention and Management	F	Screened out: This policy is a high-level policy setting out land use priorities which will be used with reference to later policies in the Plan as well as national planning policies. The policy in itself cannot lead to development.	No

Table 37 General Policies Screening

	Policy	Screening Category	Screening conclusion	Screen In
1.	GN 01 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. Reasoned justification is detailed in requirements as well.	No
2.	GN 02 Sustainable Design	I	Screened in: policy listing general criteria for testing the acceptability / sustainability of proposals. Criterion 3 includes requirements for resource efficiency and climate responsive design regarding water conservation and the use of sustainable drainage systems (SuDS). Screened in	Yes
3.	GN 03 Infrastructure and New Development	I	Screened in: this is a policy listing general criteria for testing acceptability defining requirements for proposals. Requirements do however include the need to require appropriate contributions for water, wastewater treatment and sewerage infrastructure but this is caveated in the final paragraph.	Yes
4.	GN 04 Resource Efficiency and Renewable and Low-carbon Energy Proposals	B/I	Screened in: This is a policy listing the general criteria for testing acceptability of renewable energy proposals. It is not spatially specific but could be relevant to schemes which could result in the release of additional nutrients into the river system.	Yes
5.	GN 05 Renewable Energy – target and allocations. The policy consists of 2 parts: Part 1: sets out the target per annum for renewable energy generation. Part 2:	B	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 – see Table 40.	No

	Policy	Screening Category	Screening conclusion	Screen In
	allocates two sites for solar arrays.			
6.	GN 06 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)	H	Screened out: where development does not lead to nutrient discharges screen out. Wind energy	No
7.	GN 07 Cawdor Barracks including the former Brawdy Airfield	G	Screened out: Site lies outside the catchment area.	No
8.	GN 08 Employment Proposals	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant effect. NRW advice is that there may be cases where planning applications for new commercial or industrial developments, ... could result in the release of additional nutrients into the river system.	Yes
9.	GN 09 Employment Allocations		This policy identifies employment site allocations which are considered in Table 40 Other Allocations Screening below.	—
10.	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.	A	Part 1 Screened out: This is a general statement of policy. The policy promotes changes but is not spatially specific. Potential effects on European sites cannot be identified as the policy is too general. In view of policy GN 41 and GN 47, policy GN 10 cannot undermine the conservation objectives of any European sites. For Part 2 This policy identifies mixed use allocations which are considered in Table 40 Other Allocations Screening below.	No
11.	GN 11 Protection of Employment Sites and Buildings	B/F	Screened out: Policies listing general criteria for testing the acceptability/sustainability of proposals. Will be dependent on other policies of the Plan as well.	No

	Policy	Screening Category	Screening conclusion	Screen In
12.	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 in the affected catchment area.	Yes
13.	GN 13 Residential Development	B/I	Screened in: policy listing general criteria, however proposals depending on their detail and location may be within the catchment area. The policy provides the framework for windfall proposals, conversions, and dwellings in the countryside.	Yes
14.	GN 14 Replacement Dwellings in the Countryside	B/I	Screened in: policy listing general criteria and applies Plan wide. Depending on their detail and location proposals may have a likely significant effect where a larger replacement dwelling could result in the release of additional nutrients into the river system.	Yes
15.	GN 15 – Housing Mix, Space standards and requirements for Lifetime Home Standards	B	Screened out: policy listing criteria for testing the acceptability of proposals. Will be dependent on other policies of the Plan	No
16.	GN 16 – Residential Allocations		This policy identifies residential allocations which are considered further below in Table 38.	-
17.	GN 17 Residential Commitments	-	This policy identifies residential commitments which are screened under Table 39.	—
18.	GN 18 Slade Lane, Haverfordwest	-	This policy identifies a residential allocation which is screened under Table 38.	—
19.	GN 19a Maesgwynne, Fishguard	-	This policy identifies a residential allocation which is screened under Table 38.	—
20.	GN 19b South of Conway Drive, Castle Pill Road, Steynton –	-	This policy identifies a residential allocation which is screened under Table 38.	—
21.	GN 20 – Local Needs Affordable Housing	F	Screened out: policy listing general criteria. Can only be used in conjunction with other policies that allow for development to take place and these have been screened in.	No

	Policy	Screening Category	Screening conclusion	Screen In
22.	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.	Yes
23.	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.	Yes
24.	GN 23 – Specialist and Supported Accommodation Allocations	-	This policy identifies specialist and supported allocations which are considered in further detail in Table 40.	–
25.	GN 24 Gypsy and Traveller Site Allocations	-	This policy identifies allocations which are considered in further detail in Table 40.	–
26.	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 Pembs Marine SAC.	Yes
27.	GN 26 – Telecommunications and Digital Technology Infrastructure	B	Screened out: policy listing general criteria and applies Plan wide. Proposals will not include the generation of wastewater.	No
28.	GN 27 Broadband and Telecommunications on New Developments	B	Screened out: policy listing criteria for testing the acceptability of proposals. Proposals will not include the generation of wastewater	No
29.	GN 28 – Protection and Enhancement of the Historic Environment	D	Environmental protection/site safeguarding policy	No
30.	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 depending on any increase in resident population using the facility.	Yes
31.	GN 30 – Community Facility Allocations	-	This policy identifies allocations which are	–

	Policy	Screening Category	Screening conclusion	Screen In
			considered in further detail in Table 40.	
32.	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 the Marine SAC. Further assessment is required.	Yes
33.	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 the Marine SAC.	Yes
34.	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 the Marine SAC. Proposals may include residential development.	Yes
35.	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 the Marine SAC. Proposals may include residential development.	Yes
36.	GN 35 – Marinas	B / I	Screened in: policy listing general criteria, however proposals depending on their detail and location may have a likely significant on the Pembrokeshire Marine SAC.	Yes
37.	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	B/I	Part 1 screened in: Reference is made to roadside service areas and to public transport interchanges where non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by	Yes

	Policy	Screening Category	Screening conclusion	Screen In
	transport network and, wherever the routes for these are known, to safeguard them from other developments that might compromise their implementation.		residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the case. Screened in as a precautionary. Part 2: Safeguarded routes see Table 41 below.	
38.	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.	I	Screened in: Part 1: Although not locationally specific proposal may come forward with the catchment area. Non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the case. Screened in as a precautionary. Part 2: Screening of Trefigin Quarry Allocation see Table 40 below.	Yes
39.	GN 38 – Safeguarding and Prior Extraction of the Mineral Resource	I	Screen in: policy listing general criteria for testing the acceptability of proposals but also identifies the safeguarded resource on the Proposals Map. Proposals depending on their detail and location may have a likely significant effect. Criterion 2 provides for extraction <u>not</u> having an unacceptable impact on environmental or amenity considerations. However, a typo gives the opposite meaning.	Yes

	Policy	Screening Category	Screening conclusion	Screen In
40.	GN 39 – Secondary Aggregates and Recycled Waste Minerals	B/I	Screened in: policy listing general criteria for the acceptability of proposals. Although not locationally a specific proposal may come forward with the catchment area. Non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. Unsure if this will be the case. Screened in as a precautionary.	Yes
41.	GN 40 – Buffer Zones around Mineral Sites	A	Screened out: as policy does not lead to development.	No
42.	GN 41 Protection of National Statutory Environmental Designations	M	Screened in: DTA Handbook - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12	No
43.	GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits	D	Screened out: Environmental protection/site safeguarding policy	No
44.	GN 43 Protection of Trees, Woodlands and Hedgerows	D	Screened out: Environmental protection/site safeguarding policy	No
45.	GN 44 Protection and Enhancement of Biodiversity	D/E	Screened out: Environmental protection/site safeguarding policy	No
46.	GN 45 – Green Infrastructure	A/B	Screened out: general statement of policy/general aspiration and listing general criteria.	No
47.	GN 46 – Coastal Change - policy proposed for deletion Focussed Changes	-	This Policy is proposed for deletion through the Focussed Changes consultation (ref).	No

	Policy	Screening Category	Screening conclusion	Screen In
48.	GN 47 Water Quality and Protection of Water Resources	I	Screened In: DTA Handbook includes that - Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in). F.6.3.12	Yes
49.	GN 48 – Green Wedges	D	Screened out: plan wide safeguarding of settlements.	No
50.	GN 49 – Landscape	D	Screened out: plan wide safeguarding of landscape.	No
51.	GN 50 - Policy deleted in the Deposit Plan.	–	Policy deleted in the Deposit Plan	No
52.	GN 51 – Protection and Creation of Outdoor Recreation Areas	B	Screened out: Policies listing general criteria for testing the acceptability.	No
53.	GN 52 – Protection of Open Spaces with Amenity Value	B	Screened out: Policies listing general criteria for testing the acceptability.	No
54.	GN 53 Community Growing Spaces	B/I	Screened in: Policies listing general criteria for testing the acceptability. May include the potential use of more intensive forms of fertilization.	Yes
55.	GN 54 – Visitor Attractions and Leisure Facilities	B/I	Screened in: There may be cases where planning applications for new commercial or industrial developments, such as conference facilities, large retail sites or major tourist attractions could result in the release of additional nutrients into the river system.	Yes
56.	GN 55 – Serviced and Hotel Accommodation	B/I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes

	Policy	Screening Category	Screening conclusion	Screen In
57.	GN 56 – Caravan, Camping and Chalet Development	B / I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes
58.	GN 57 – Site Facilities on Existing Caravan and Camping Sites	B / I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes
59.	GN 58 Self-Catering Accommodation	B/I	Screened in: developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. This includes, but is not limited to, self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.	Yes
60.	GN 59 – Waste Management Facilities The policy is in two parts. Part 1 lists criteria for the consideration of waste management facilities.	B/I	Part 1 Screened in: policy listing general criteria, however proposals depending on their detail and location may have an impact in the catchment.	Yes

	Policy	Screening Category	Screening conclusion	Screen In
	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 2 Potential sites - see Table 40.	
61.	GN 60 – Disposal of Waste on Land	B/I	Screened in: Part 1: Although not locationally specific proposals may come forward within the catchment area. Non-residential development may lead to increases in nutrient discharges. These include developments expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC catchment. Unsure if this will be the case. Screened in as a precautionary.	Yes

Table 38 Policy GN 16 Housing Allocations Screening*

*To note some sites may include land with planning permission where the Council can no longer require Habitats Regulations Assessment screening.

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/003/LDP2/1	Yes	North of Begelly Farm	Begelly	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/006/00003	No	Adjacent to Hafod	Blaenffos	West Wales Marine (Nyfer)	No
HSG/020/LDP2/1	No	Land at Tan Ffynnon Fields	Cilgerran	Cardigan Bay (Teifi) (Also West Wales Marine)	No
HSG/022/LDP2/1	Yes	Land at Dungleddy Court	Clarbeston Road	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/152/LDP2/1	Yes	South of Bro'r Dderwen	Clunderwen	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/029/00014	Yes	Opposite Woodholm Close	Crundale	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/029/LDP2/1	Yes	West of Ashford Park	Crundale	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/030/LDP/01	No	East of Waunaeron	Crymych	West Wales Marine (Nyfer)	No
S/HSG/034F/LDP2/1	No	Maesgwynne	Fishguard	West Wales Marine (direct)	No
HSG/040/LDP2/1	Yes	Former Education Centre, Dew Street	Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Yes
S/HSG/040/LDP2/6	Yes	Slade Lane	Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/043/LDP2/1	Yes	Adjacent to Brackenhurst	Hill Mountain	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/046/LDP2/1	Yes	Land at West End Cottages	Hundleton	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/047/LDP2/1	Yes	South of The Crown	Jeffreyston	Pembrokeshire Marine inner - directly (Cleddau) - and to note that there is no water company WwTW in this settlement.	Yes

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/048/00038	Yes	North of Hayston View	Johnston	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/048/LDP2/1	Yes	Maes yr Ysgol	Johnston	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/049/LDP2/1	Yes	East of Brookfield Close	Keeston	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/050/LDP2/1	Yes	South of Rock Park	Kilgetty	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/052/00011	Yes	South of Cleggars Park	Lamphey	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/052/LDP2/1	Yes	Adjacent to Lamphey School	Lamphey	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/053/LDP2/1	Yes	Between Longstone Court and 62, St. Davids Road	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/060/LDP2/1	Yes	Adjacent to Maesybryn	Llandissilio	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/063/00024	Yes	North of The Kilns	Llangwm	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/066/LDP2/1	Yes	East of Hazelbank	Llanstadwell	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/081/LDP2/1	Yes	West of Globe Inn	Maenclochog	Pembrokeshire Marine inner - (via riverine Cleddau)	Yes
HSG/040/LDP2/3	Yes	Rear of 76 Pembroke Road	Merlins Bridge	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/086/00222	No	South West of The Meads	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/1	No	Land at Myrtle Meadows, Steynton	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/2	No	East of Castle Pill Road Steynton	Milford Haven	Pembrokeshire Marine - outer	No

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/086/LDP2/4	No	Former Hakin Infants' School	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/5	No	Former Hubberston VC School, Hakin	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/6	No	Former Hakin Junior School	Milford Haven	Pembrokeshire Marine - outer	No
HSG/086/LDP2/7	No	North East of Beaoning, Steynton	Milford Haven	Pembrokeshire Marine - directly (Cleddau) - there is a watershed issue on this site - The Beaoning Field Site needs to be screened in for surface water - to be cautious. Welsh Water have said the site can connect to the foul sewer and sewered flow will go to the Milford WwTW which is outside the inner catchment area.	Yes
S/HSG/086/LDP2/3	No	South of Conway Drive, Castle Pill Road, Steynton	Milford Haven	Pembrokeshire Marine - outer	No
HSG/088/LDP2/1	Yes	West of Bloomfield Gardens and North of Adams Drive & Highfield Park	Narberth	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/093/00066	Yes	East of Poppy Drive	Neyland	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/095/00144	Yes	North of Gibbas Way	Pembroke	Pembrokeshire Marine inner- directly (Cleddau)	Yes
HSG/095/LDP2/1	Yes	Between St Daniels Hill & Norgans Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/095/LDP2/2	Yes	South West of Southlands, St. Daniels Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/095/LDP2/4	Yes	East of Golden Hill Road	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/095/LDP2/5	Yes	South East of Southlands St.Daniels Hill	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/096/00238	Yes	North of Pembroke Road	Pembroke Dock	Pembrokeshire Marine - inner - directly (Cleddau)	Yes
HSG/096/LDP2/1	Yes	Land at Hampshire Drive	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/096/LDP2/2	Yes	West of Stranraer Road	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Yes
HSG/096/LDP2/3	Yes	Land south of Sycamore Woods and west of Lavinia Drive	Pembroke Dock	Pembrokeshire Marine - directly (Cleddau)	Yes
HSG/099/LDP2/1	No	Land at Coppins Park	Pentlepoir	Carmarthen Bay and Estuaries -via storm overflow into Saundersfoot Stream or possibly pumped to Tenby and just outside Carms Bay in Bristol Channel Approaches.	No
HSG/113/LDP2/01	Yes	South of Robeston Court	Robeston Wathen	Pembrokeshire Marine - (via riverine Cleddau) - and to note that there is no water company WwTW in this settlement.	Yes
HSG/114/LDP/01	No	East of Pilgrim's Way	Roch	Pembrokeshire Marine and West Wales Marine - directly	No
HSG/119/LDP2/1	Yes	Between Cornerways and Austalise	Simpson Cross	Pembrokeshire Marine - (via riverine Cleddau)	Yes
HSG/120/00018	Yes	North West of Wesley Way	Spittal	Pembrokeshire Marine - (via riverine Cleddau)	Yes

LDP2_Reference	Drain into Milford Haven inner	Site Name	Settlement	Discharges to SAC	Screen In
HSG/122/00035	No	Awel y Mor extension	St Dogmaels	Cardigan Bay (Teifi) (Also West Wales Marine) - foul flows are pumped to Cardigan WwTW in Ceredigion - and to note that this works is being upgraded by the water company and that there is an embargo on occupation of new residential development until this work is completed (expected to be in 2027).	No
HSG/123/LDP/01	No	North of Parsons Green	St Florence	Bristol Channel Approaches Ritec - just outside Carmarthen Bay and Estuaries	No
HSG/132/LDP2/1	No	West of Kings Park Farm	Templeton	Carmarthen Bay and Estuaries	No
HSG/135/LDP2/1	No	North of Bulford Road Bypass	Tiers Cross	Pembrokeshire Marine - directly (Cleddau) - sewers drain out - surface water possibly in. Screen in for surface water.	Yes
HSG/149/LDP2/1	Yes	Land at Ford Farm	Wolfscastle	Pembrokeshire Marine - (via riverine Cleddau)	Yes

Table 39 Policy GN 17 Residential Commitments Screening

Allocation Name	LDP Reference	Site Total	Units under construction	Commitment Units Remaining in plan period (NS only)	Conclusion	Screen In Unit No.
Scarrowscant	040/00431	181	9	0	Out	0
141 Portfield	040/00397	20	0	20	Out	0
Kensington Garden/Area of land behind City Rd	040/00077	133	3	2	Out	0
Calvary Church	040/00373	8	0	8	In	8
Snooker Club	040/00430	16	0	8	In	8
Brooklands Park	040/00106	21	0	18	Out	0
7 Dew Street	040/00445	5	0	5	Out	0
Beaconing Drive, Steynton	086/00129	81	2	28	Out	0
Thornton Rd	086/00223	10	10	0	Out	0
Land at Milford Marina	086/00377	190	0	45	Out	0
132 Robert Street	086/00378	8	0	8	Out	0
72-78 Charles Street	086/00381	15	0	15	Out	0
Woodlands View	086/00282	7	0	4	Out	0
Imble Lane	096/00373	100	30	70	Out	0
Land N of Cleddau Bridge Hotel	096/00274	5	1	2	In	3
Land N of Cleddau Bridge Hotel	096/00375	14	0	7	In	7
Hampshire Drive	096/00230	6	2	4	Out	0
Land adjacent to Long Mains and Monkton Priory	095/00147	208	0	70	Out	0
Green Haven, Monkton	095/00180	30	0	11	In	11
Springfield	095/00240	5	0	2	In	1
West of Clos-Y-Bigney	034/00165	50	0	50	Out	0
Maesgwynne Farm Complex	034/00165	5	1	2	Out	0
Delfryn, Heol Penlan, Stop & Call	034/00099	9	0	5	Out	0
Main Street	034/00292	26	0	26	Out	0
Rushacre Gardens	088/00077	54	0	27	In	1
Old Narberth CP School	088/00360	11	0	8	Out	0
Dingle Farm	088/00074	33	0	16	In	16
Between the school and station road	030/00043	56	0	56	Out	0
Crug yr Efydd	030/00019	26	2	5	Out	0
Pond Bridge Farm	048/00017	123	14	40	Out	0
Land to rear of Newton Hall	050/00043	19	0	19	Out	0
Parc Maen Hir	053/00034	26	0	26	Out	0
Phase 2, Court Meadow	053/00009	27	0	27	Out	0
Former Go Cart Track	053/00052	23	2	11	Out	0

Allocation Name	LDP Reference	Site Total	Units under construction	Commitment Units Remaining in plan period (NS only)	Conclusion	Screen In Unit No.
Old Station Yard	007/00047	30	0	20	Out	0
North of New Road	003/00040	70	0	35	In	35
Barley Park Close	003/00025	26	3	17	Out	0
South of Tinker's Fold	025/00028	6	2	4	In	5
North of the Forge	028/00012	22	0	22	Out	22
Dingle Lane	029/00013	40	0	1	In	1
Woodholm Farm	029/00026	5	1	2	In	3
South West of Eglwysrwr School	033/00035	23	23	0	Out	0
Will Meadows	035/00030	28	2	11	Out	0
Poplar Meadow	035/00021	7	1	0	Out	0
North of Cartref	042/00013	15	0	8	Out	0
Leven Close	044/00050	13	0	1	In	1
Cyfin Barn Farm	044/00063	11	1	3	In	4
Harcourt Close	044/00015	40	0	28	In	5
Bowett Close	046/00015	29	0	5	Out	0
Ger Y Lein Fach	081/LDP/01	13	0	2	Out	0
Maes Roslyn	081//LDP/01	13	0	13	In	4
Parc Yr Odyn	085/00022	7	1	4	Out	0
Sycamore Close	099/00045	6	0	3	Out	0
Cornfields Walk	015/00024	100	30	0	Out	0
Sageston Fields	015/00022	38	0	7	In	7
East of Hill Lane	119/LDP/01	20	0	20	Out	0
Old Smithy Craft Centre	119/00028	4	4	0	Out	0
Pembrokeshire Motor Museum	119/00030	26	0	13	Out	0
Ash Grove Gardens	123/00045	11	2	3	Out	0
Land adj Blaenffynnon Farm	131/00021	30	1	13	Out	0
Barnlake Point	154/00001	22	1	10	In	10
Hawn Lake	011/00011	13	0	1	In	1
Land to the S of Kiln Park	012/00004	8	1	6	In	2
Maes Elwyn John	110/00015	7	1	1	Out	0
St Twynnell's Farm	125/00009	5	2	0	Out	0
Bluebell Lane	000/01202	7	1	0	Out	0
Grand Total				898		155

Table 40 Other Allocations Screening

(Policy GN 05, GN 09, GN 10, GN 23, GN 24, GN 30, GN 59, SP 14, SP 15)

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
GN 05	SPV/066/LDP2/01	Solar Array	East of Hazelbank, Llanstadwell	Llanstadwell	Pembrokeshire Marine inner - directly (Cleddau)	Screened in as a precautionary	Yes
GN 05	SPV/149/LDP2/01	Solar Array	Ford Farm, Wolfscastle	Wolfscastle	Pembrokeshire Marine inner - (via riverine Cleddau)	Screened in as a precautionary	Yes
GN 09	EMP/040/LDP2/01	Employment	Withybush Showground	Crundale/ Haverfordwest	Pembrokeshire Marine inner - (via riverine Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	Yes
GN 09	EMP/030/00001	Employment	Parc Gwynfryn	Crymych	West Wales Marine (Nyfer)		No
GN 09	EMP/030/LDP2/01	Employment	South of Parc Gwynfryn	Crymych	West Wales Marine (Nyfer)		No

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
GN 09	EMP/053/00001	Employment	Old Station Yard, Letterston	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)		Yes
GN 09	EMP/000/LDP2/01	Employment	Land at Princes Gate Spring Water	Ludchurch	No public sewerage Carmarthen Bay and Estuaries (via riverine Taf)		No
GN 09	EMP/088/LDP/01	Employment	Rushacre Enterprise Park Extension Narberth	Narberth	Pembrokeshire Marine inner - (via riverine Cleddau)		Yes
GN 09	EMP/093/00001	Employment	North of Honeyborough Industrial Estate	Neyland	Pembrokeshire Marine inner - directly (Cleddau)		Yes
GN 09	EMP/034/00006	Employment	Celtic Link Business Park, Scleddau	Scleddau	No public sewerage. Crosses watershed - Either West Wales Marine via Goodwick Brook or Pembrokeshire Marine inner - (via riverine Cleddau)	No public sewerage. Crosses watershed.	Yes

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
GN 09	EMP/132/LDP2/01	Employment	South of KP Thomas & Sons	Templeton	No public sewerage. Crosses watershed - Either Pembrokeshire Marine inner - (via riverine Cleddau) or Carmarthen Bay and Estuaries	No public sewerage. Crosses watershed	Yes
GN 10	MXU/040/01	Mixed Use	Haverfordwest-Old Hakin Road	Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site planning permission in place.	No
GN 10	MXU/095/LDP2/01	Mixed Use	South Quay	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)		Yes
GN 23	SSA/088/LDP2/01	Supported Accommodation	Redstone, Narberth	Narberth	Pembrokeshire Marine inner - directly (Cleddau)		Yes
GN 23	SSA/089/01	Supported Accommodation	Southwest of Park House, Tenby	New Hedges	Carmarthen Bay and Estuaries (outfall adjacent to SAC)		No
GN 23	SSA/089/LDP2/01	Supported Accommodation	East of Park House, Tenby	New Hedges	Carmarthen Bay and Estuaries		No

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
					(outfall adjacent to SAC)		
GN 23	SSA/135/LDP2/01	Supported Accommodation	North of Bulford Road Bypass, Tiers Cross	Tiers Cross	Pembrokeshire Marine inner - directly (Cleddau)	Inside catchment but sewered connection flows outside (include for SUDS)	Yes
GN 24	GT/040/LDP2/01	Gypsy Site	East of Withybush Gypsy and Traveller site	Crundale/ Haverfordwest	Pembrokeshire Marine inner-directly (Cleddau)		Yes
GN 24	GT/003/LDP2/01	Gypsy Site	West of Kingsmoor Common Gypsy and Traveller site	Kilgetty	Pembrokeshire Marine -inner (via riverine Cleddau)		Yes
GN 24	GT/095/LDP2/1	Gypsy Site	Castle Quarry eastern extension	Pembroke	Pembrokeshire Marine —directly (Cleddau)	Focussed Changes - site proposed for deletion	No
GN 24	GT/095/LDP2/2	Gypsy Site	South of Monkton Playing Fields	Pembroke	Pembrokeshire Marine inner - directly (Cleddau)		Yes
GN 30	CF/086/LDP2/1	Community Facility	New Primary and Secondary Schools Milford Haven	Milford Haven	Pembrokeshire Marine outer - directly (Cleddau)		No

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
GN 59	EMP/146/00001	Waste Management	Waterston Industrial Estate	Llanstadwell	Pembrokeshire Marine inner - directly (Cleddau)	Outside area but if connects to sewered are then will flow in.	Yes
SP 14	S/EMP/040/00001	Strategic Employment	Withybush cluster (West Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	Yes
SP 14	S/EMP/040/00004	Strategic Employment	Withybush cluster (Trading Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner-directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	Yes
SP 14	S/EMP/040/00005	Strategic Employment	Withybush cluster (East of Lodge Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	Yes

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
SP 14	S/EMP/034/LDP/02	Strategic Employment	Goodwick-Parrog	Goodwick	West Wales Marine (direct)		No
SP 14	S/EMP/136/00001	Strategic Employment	Former RNAD Site, Trecwn	Letterston	Pembrokeshire Marine inner - (via riverine Cleddau)	The current WwTW in this area is unlikely to have capacity to serve any redevelopment of any significant scale on this site – a new (private) WwTW would therefore be needed.	Yes
SP 14	S/EMP/086/LDP/01	Strategic Employment	Blackbridge	Milford Haven	Pembrokeshire Marine outer - directly (Cleddau)	There could be retained infrastructure from previous uses, but it would be likely to need comprehensive upgrade or replacement if the site is redeveloped.	No
SP 14	S/EMP/086/LDP2/01	Strategic Employment	Thornton Industrial Estate cluster (Hayguard Hay, Thornton)	Milford Haven	Pembrokeshire Marine outer - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems.	No

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
SP 14	S/EMP/096/00001	Strategic Employment	Pembrokeshire Science & Technology Park cluster	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems.	Yes
SP 15	S/EMP/040/00011	Safeguarded Strategic Employment	Withybush cluster (East Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner - directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	Yes
SP 15	S/EMP/040/00012	Safeguarded Strategic Employment	Withybush cluster (North Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner-directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are requiring this at Withybush.	Yes
SP 15	S/EMP/040/00015	Safeguarded Strategic Employment	Withybush cluster (Lodge Estate)	Crundale/ Haverfordwest	Pembrokeshire Marine inner-directly (Cleddau)	Site will need service extensions to connect into existing public sewerage systems. NRW are	Yes

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
						requiring this at Withybush.	
SP 15	S/EMP/034/00003	Safeguarded Strategic Employment	Goodwick Industrial Estate	Goodwick	West Wales Marine (direct)		No
SP 15	S/EMP/000/00003	Safeguarded Strategic Employment	Milford Haven Petrochemical storage facility	Milford Haven	Pembrokeshire Marine outer - directly (Cleddau)	(Puma Energy) – likely to deal with most of its own waste generation on site.	No
SP 15	S/EMP/000/00004	Safeguarded Strategic Employment	Waterston Tank Farm, Dragon LNG, Milford Haven	Milford Haven	Pembrokeshire Marine inner-directly (Cleddau)	Waterston Tank Farm and LNG, Milford Haven – likely to deal with most of its own waste generation on site.	Yes
SP 15	S/EMP/000/00007	Safeguarded Strategic Employment	South Hook LNG (part)	Milford Haven	Pembrokeshire Marine outer-directly (Cleddau)	South Hook LNG (part) – likely to deal with most of its own waste generation on site.	No
SP 15	S/EMP/086/00003	Safeguarded Strategic Employment	Thornton Industrial Estate cluster	Milford Haven	Pembrokeshire Marine outer - directly (Cleddau)		No

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
SP 15	S/EMP/000/00002	Safeguarded Strategic Employment	Pembroke Oil Refinery (Valero)	Pembroke Dock	Pembrokeshire Marine outer -	Pembroke Oil Refinery (Valero) – is understood to be able to deal with most of its own waste generation on site / on nearby land.	No
SP 15	S/EMP/095/00001	Safeguarded Strategic Employment	Pembroke Power Station	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Pembroke Power Station – likely to deal with most of its own waste generation on site.	Yes
SP 15	S/EMP/096/00002	Safeguarded Strategic Employment	Pembroke Dock cluster (Royal Dockyard)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	Yes
SP 15	S/EMP/096/00003	Safeguarded Strategic Employment	Pembroke Dock cluster (West Llanion)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	Yes

Policy Ref	LDP2_Reference	Allocation Type	Site Name	Nearest Settlement	Discharges to SAC	Notes	Screen In
SP 15	S/EMP/096/00004	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock cluster (Ferry Lane)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	Yes
SP 15	S/EMP/096/00005	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock cluster (Kingswood)	Pembroke Dock	Pembrokeshire Marine inner - directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	Yes
SP 15	S/EMP/096/00006	Safeguarded Strategic Employment	London Road and Ferry Lane Pembroke Dock (Waterloo & London Road)	Pembroke Dock	Pembrokeshire Marine inner-directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	Yes
SP 15	S/EMP/096/00007	Safeguarded Strategic Employment	Pembrokeshire Science & Technology Park cluster (Cleddau Bridge)	Pembroke Dock	Pembrokeshire Marine inner-directly (Cleddau)	Likely to connect into existing public sewerage systems, but it is difficult to get definitive evidence on this.	Yes

Table 41 Policy GN 36 Transport Routes Screening

Reference	Scheme Name	Location	Notes	Screen In
TS/LDP2/03	Well Hill improvement, Pembroke	Well Hill - Pembroke	Within the catchment area	Yes
TS/LDP2/04	Milford Haven public transport interchange	Not within the catchment		No
TS/LDP2/05	Haverfordwest public transport interchange	Haverfordwest Train Station	Within the catchment area	Yes
TS/LDP2/08	Haverfordwest public transport interchange	Haverfordwest Bus Station	Within the catchment area	No – under construction July 2025

9. Appendix 2 Guidance for the Council's website

The guidance set out below could usefully be added to the Council's website to guide developers:

Where a completed Nutrient Neutrality Budget Calculator identifies that an additional total annual nitrogen load needs to be mitigated, applicants will need to demonstrate and evidence how this mitigation will be identified and secured.

Mitigation can be provided on site or off site. Offsite mitigation must be located upstream of the development area in the same catchment area.

Mitigation could also be provided in the form of the change in land use of off-site land from a higher to certain lower nutrient generating uses. For example, cereals (arable) or lowland (grazing) to woodland. In order for the Council to complete the appropriate assessment applicants seeking to use off site land as mitigation will need to submit:

- Evidence of the mitigation land's current use such as a Baseline Condition Assessment
- Evidence and details of how the proposed habitat will be created, such as a Planting Schedule
- Evidence of how the proposed habitat will be managed and monitored in perpetuity, such as a Habitat Management and Monitoring Plan
- A separate completed Nutrient Neutrality Budget Calculator including the mitigation land.
- A legal mechanism will also need to be used to secure the land for nutrient neutrality mitigation purposes in perpetuity.

Other measures which could be taken to reduce nitrogen pollution from development proposals include:

- Lower Water usage – Applicants can consider ways in which their development could reduce the water usage lower than the 120 litres³¹ per person per day (which is used in the calculator)
- Lower water usage rates should be evidenced properly and submitted with the completed budget calculator.
- Sustainable Drainage Schemes (SuDS) – Applicants will need to include SuDS and design this to maximise the opportunity to capture and remove nitrogen from the surface water runoff of your proposal. The Construction Industry Research and Information Association (CIRIA) has published a guide: Using SuDS to reduce nitrogen in surface water runoff (2023). This is intended for areas where nutrient neutrality is required. The guide outlines the design criteria for a good SuDS scheme that can maximise the opportunity to capture and remove nitrogen.

³¹ Figure used in the All-Wales Nutrient Budget Calculator.

10. Appendix 3 Winchester City Council 106 Terms

WINCHESTER CITY COUNCIL - NITRATES MITIGATION – Draft 106 heads of terms

1. Developer to provide a nitrate mitigation plan for approval by the Council prior to commencement of the Development confirming proposed onsite nitrate mitigation measures or offsite mitigation measures or offsetting.
2. Developer to provide approved nitrate mitigation measures on-site to satisfaction of the Council prior to occupation of the development and maintain for duration of use of development; or
3. Developer to provide approved offsite mitigation measures to satisfaction of the Council prior to occupation of the development and ensure maintenance for duration of use of development; or
4. Developer to pay contribution for nitrate offset credits to Council prior to commencement of the development.
5. Nitrate offset credits contribution to be calculated based on methodology approved by Natural England at a rate of £3,500 per 1kg for number of units in development for duration of use of development (128 years)
6. Bond to be provided by developer to Council prior to occupation to cover cost of maintenance of onsite or offsite mitigation measures for duration of use of development.
7. Offsite mitigation measures to be provided at or offsetting contribution to be expended on purchasing credits from land secured by Council or third party within the Solent area that provides appropriate and sufficient nitrate mitigation to cover nitrogen load of development for duration of use.
8. No occupation of development until sufficient nitrate mitigation or credits have been secured/purchased to satisfaction of Council to offset nitrogen load of development for duration of use.
9. Developer to provide prior notification of intended first occupation of development units.

11. Appendix 4 Assumptions used for the All-Wales Calculator

Wherever possible the All-Wales Nutrient Budget Calculator³² default figures (what it is already populated with) have been used. This includes:

- An occupancy rate of 2.22 for Pembrokeshire LPA area
- A water usage per resident of 120 litres/person/day
- Concentrations of Nitrogen for Waste Water Treatment Works and Package Treatment Plants of 27 mg TN/l and 72.9 mg TN/l respectively where Waste Water Treatment Works are listed.
- Rainfall figures

Data was not always available (in-built) in the calculator such as:

- Concentrations of Nitrogen released from certain specific wastewater treatment works was not available - In these cases an average was used based on the figures provided in “Nutrient Neutrality Generic Methodology” Ricardo and Natural England Published November 2022³³ which matched the All-Wales calculator pre-populated figure above.
- Rainfall data (if not automatically provided in the Calculator): The calculator instructed the user to use a link for rainfall data (National River Flow Archive³⁴).
- Pre-existing landcovers: These were inputted based on historic aerial photography and candidate site submissions.
- Soil drainage information: A link for soil drainage data (Landis³⁵) was given in All Wales Nutrient Budget Calculator.
- SUDS reduction figures. An overall SUDS nitrogen reduction of 30% for surface water was applied as described from Paragraph 6.18 above.

³² [Nutrient budget calculator | GOV.WALES](https://www.gov.wales/nutrient-budget-calculator) <https://www.gov.wales/nutrient-budget-calculator>

³³ [Nutrient Neutrality Generic Methodology - NECR459](https://publications.naturalengland.org.uk/publication/5143927928913920) <https://publications.naturalengland.org.uk/publication/5143927928913920>

³⁴ National River Flow Archive (Usk at Chainbridge) <https://nrfa.ceh.ac.uk/data/station/info/56001>

³⁵ Land Information System <https://www.landis.org.uk/soilscapes/#>.

12. Appendix 5 Mitigation Measures Menu – see separate spreadsheet.

13. Appendix 6 How are nutrient credits derived.

Nutrient credits are derived by quantifying the reduction of nitrogen entering the environment, typically by changing land use or implementing specific mitigation projects. One credit is equivalent to a 1-kilogram reduction of total nitrogen per year. These credits are then sold to developers to offset the nutrient impact of new projects, allowing them to meet "nutrient neutrality" planning requirements.

How credits are derived

- **Baseline assessment:** Before any action is taken, the current amount of nitrogen leaching from the land must be calculated to establish a baseline. For agricultural land, this often involves using data from the past 10 years of farming activities to determine an average nitrogen loss rate.
- **Mitigation actions:** Landowners adopt practices that significantly reduce the amount of nitrogen leaching from the land. Common methods include:
 - **Land-use change:** Converting high-intensity agricultural land, such as that used for pig or crop farming, to low-intensity uses like woodland, wetlands, or conservation grassland.
 - **Wetland creation:** Constructing new wetlands that act as natural filters to remove nitrogen from water flowing through the area.
 - **Sewerage system upgrades:** For some schemes, upgrading septic tanks can also contribute to a reduction in nitrogen entering the environment.
- **Credit calculation:** The number of credits generated is the difference between the nitrogen leaching from the baseline (previous) land use and the nitrogen leaching from the new, low-intensity land use. This calculation is typically performed using approved nutrient budget calculators and verified by regulatory bodies like Natural England and local planning authorities.
 - **Example:** If land previously used for intensive poultry farming (70.7 kgN/ha/yr) is converted to woodland (5 kgN/ha/yr), the net reduction is 65.7 kgN/ha/yr. This would generate 65.7 credits per year per hectare.
 - The general formula for credit calculation is: $Credits = (\text{Baseline annual nitrogen output} - \text{New annual nitrogen output})$
- **Legal agreement:** For the credits to be sold, the landowner must enter into a legal agreement, often a Section 106 Agreement, that covenants the land for its new use for a long-term period, such as 80–125 years. This ensures the environmental benefits are permanent and provides assurance to developers purchasing the credits.

Cost of mitigation and administration

The foundational price of a credit is determined by the costs incurred by the provider to generate the nutrient reduction and maintain it for the long term. These costs typically include:

- **Land costs:** The expense of purchasing, leasing, or repurposing land for mitigation projects like wetlands or woodlands.

- Implementation costs: The price of designing, constructing, and planting the mitigation project.
- Long-term management: An allowance for ongoing monitoring, maintenance, and potential inflationary pressures over the decades that the land is legally protected for mitigation.
- Administrative fees: Costs for processing applications, legal agreements, and other paperwork are often added to the final price paid by the developer.