



Pembrokeshire County Council Local Development Plan: Sustainability Appraisal Report

~~Deposit Plan~~ POST DEPOSIT VERSION

~~Consultation: 26 January 2011 – 9 March 2011~~

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Chapter 1: Non-Technical Summary

Non-Technical Summary

Introduction

1.1 Pembrokeshire County Council is preparing a Local Development Plan (LDP, the Plan). The Plan is a requirement of Part 6 of the Planning and Compulsory Purchase Act 2004. This will replace the Joint Unitary Development Plan and set out the development strategy and policy framework for the development and conservation needs of the area of Pembrokeshire excluding the National Park from adoption to 2021. As part of the process for preparing the plan a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) will test the LDP's contribution towards sustainable development. This is a statutory requirement.

SA/SEA process

1.2 There are five stages in the SA process comprising:

Stage A: Setting the context and objectives, establishing the baseline and deciding the scope;

Stage B: Developing and refining options/alternatives and assessing effects;

Stage C: Preparing the Sustainability Appraisal (SA) Report. This is known as the Environmental Report according to SEA Regulations, however this report uses the term SA Report throughout;

Stage D: Consult on the draft plan or programme and the SA Report;

Stage E: Monitor the significant effects of implementing the plan or programme on the environment.

1.3 The first stage of the SA process was to produce a Scoping Report (See SA Scoping Report¹). The report set the context and scope of the assessment and included a report on the current state of the environment, and on the social and economic situation in the County. Key sustainability issues were identified and objectives set to address these sustainability issues. The LDP was tested against these objectives to ensure the plan contributed towards sustainable development. The SA Scoping Report was consulted on with the statutory consultees in July 2008 and the amended version published in January 2009.

1.4 An Initial SA Report then assessed the Local Development Plan Preferred Strategy (See Initial SA Report 2009²). However, the policies were expanded and changed following consultation on the Preferred Strategy and Initial SA

¹ SA Scoping Report January 2009 -

<http://www.pembrokeshire.gov.uk/content.asp?id=13440&nav=109,141,1014>

² Initial SA Report March 2009 –

<http://www.pembrokeshire.gov.uk/content.asp?id=13440&nav=109,141,1014>

Report. Comments made on the Preferred Strategy were incorporated where appropriate into the LDP Deposit.

1.5 The Preferred Strategy was superseded by the LDP Deposit. This is the version of the plan which establishes a vision based development strategy and includes both strategic and general policies with specific land allocations to guide development and the use of land in Pembrokeshire excluding the National Park from adoption to 2021.

1.6 Sustainability Appraisal of the LDP Deposit was carried out in accordance with guidance from the Welsh Assembly and UK Government.

Sustainability Appraisal Framework

1.7 A sustainability framework was developed from the current baseline, sustainability issues and context with other legislation, plans and programmes, which are defined in terms of Sustainability Appraisal Objectives (see below). The development of the SA Objectives is documented in the SA Scoping Report which was subject to statutory consultation.

1. Develop and maintain a balanced population structure
2. Promote and improve human health and wellbeing through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment
3. Improve education opportunities to enhance the skills and knowledge base
4. Minimise the need to travel and encourage sustainable modes of transport.
5. Provide a range of high quality housing including affordable housing to meet local needs
6. Build safe, vibrant and cohesive communities which have improved access to key services and facilities
7. Protect and enhance the role of the Welsh language and culture
8. Provide a range of good quality employment opportunities accessible to all sections of the population
9. Support a sustainable and diverse local economy
10. Prepare for and reduce the impact of Pembrokeshire's contribution to climate change
11. Maintain and improve air quality
12. Minimise the generation of waste and pollution
13. Encourage the efficient production, use, re-use and recycling of resources
14. Maintain and protect the quality of inland and coastal water
15. Reduce the impacts of flooding and sea level rises
16. Use land efficiently and minimise contamination

17. Safeguard soil quality and quantity
18. Protect, enhance and value biodiversity
19. Protect and enhance the landscape and geological heritage
20. Encourage quality locally distinct design that complements the built heritage
21. Protect, enhance and value the built heritage and historic environment

LDP Deposit

1.8 The Plan has been developed from a number of background papers and documents. It includes a vision and objectives of what the county should be like at the end of the Plan period – 2021. Strategic policies have been developed and Land allocations.

LDP Vision

1.9 The overall vision describes land use elements as set out in the Wales Spatial Plan (People, Places, Futures: The Wales Spatial Plan 2008 Update) and Pembrokeshire's Community Plan (Update 2009).

The LDP Vision:

“To ensure that Pembrokeshire is prosperous and that it remains vibrant and special by creating: a network of strong urban and rural communities in Hub Towns, Service Centres, Service and Local Villages supported by a robust, sustainable, diverse high value-adding economy underpinned by the Area’s unique environment, maritime access to the Milford Haven Waterway and Fishguard Harbour and internationally important energy and tourism opportunities.”

LDP Objectives

1.10 The 10 LDP objectives and 23 sub-objectives underpin the key principle of delivering sustainable development. The LDP vision determines what sort of place the plan area should be (LDP Manual, section 5.5). The LDP objectives were derived from the evidence base and specific issues in the area in order to deliver the Plan.

Objective	Sub objective
Mitigating and responding to climate change (A) AND Improving access to	- To retain best quality agricultural land for productive purposes. - To minimise development on areas of land at

goods and services (I)	flood risk. • To promote housing development in settlements where good levels of services already exist to reduce the need to travel. • To reduce the need to travel to access work, services and goods. • To be efficient in the use of resources and energy.
Building on the County's strategic location for energy and port related development (E)	• To ensure sufficient land is available for port and energy/renewable energy technologies both for research and for delivery in key sites on the Haven and in the Hub Towns. • To improve connectivity across the County and particularly to the Hub Towns and Haven. • To provide necessary infrastructure for development to take place.
Supporting the development of the distinctive role of Pembrokeshire's towns, especially within the Haven Hub (F) AND Regenerating Town Centres (G)	• To strengthen and improve the retail offer. • To strengthen Haverfordwest's role as a sub-regional centre.
Developing a quality visitor economy founded on a distinct sense of place and an outstanding natural and built environment (H)	• To encourage development that complements the natural and built environment. • To improve the range and quality of attractions and accommodation.
Sustaining and enhancing the rural and urban economy (C)	• To reduce the need to travel. • To facilitate agricultural diversification in rural areas • To safeguard the mineral resource and manage its development.
Developing vibrant communities providing a range and mix of homes and local services (D)	• To provide sufficient land to meet the housing needs arising within the County Council's planning area. • To provide housing which is affordable. • To protect local culture and language. • To enable the provision of community facilities.

Delivering design excellence and environmental quality (B) AND Protecting and enhancing the natural and built environment (J)	• To protect and enhance the natural environment, particularly designated nature sites and protected species and habitats across the plan area. • To manage waste sustainably. • To conserve and enhance the historic environment. • To achieve good sustainable design.
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LDP Strategy

1.11 The LDP strategy is designed to deliver the vision for Pembrokeshire, meet the objectives of the Plan and respond to the issues identified to deliver sustainable development. It is derived from national and regional policy principles and an evaluation of economic, social and environmental factors and the key issues and characteristics that make Pembrokeshire unique.

1.12 This strategy will be implemented through developments that comply with 16 strategic policies contained within this chapter and supported by general policies and allocations.

Method of Appraisal

1.13 Sustainability Appraisal was carried out for the LDP Vision, Strategic Policies, General Policies and allocated sites. The compatibility of the LDP Objectives with the SA Objectives was assessed using a matrix. The LDP policies were assessed against the SA Objectives with a commentary to expand on the assessment. The matrices also determine whether the policies contribute to meeting the SA Objective and whether the policies are compatible. The purpose of assessing the plan through the SA is to predict the social, environmental and economic effects of the policies being considered in the LDP preparation process. A commentary/explanation is provided which sets out the reasoning behind the prediction of the effects of the Plan and hence its ability to meet the requirements for sustainable development.

Conclusions of Appraisal

LDP Objectives

1.14 The appraisal of the 10 LDP Objectives sought to test their compatibility against the SA objectives, thereby identifying any potential conflict or omission between both sets of objectives. The appraisal matrices (see Appendix 1) revealed that the objectives are broadly consistent with the sustainability objectives.

Strategic and General Policies

1.15 The 16 strategic policies and 41 general policies were assessed against the SA Objectives. Most of the Policies were compatible and contributed towards meeting the SA Objectives. The policies were assessed by the County Council's Sustainability Appraisal Officer, with input from planning and specialist officers to predict their impacts with regard to the Sustainability Appraisal Objectives. Informal advice was also sought from the statutory consultees. Specifically, the SA helped to ensure that the development of the Strategic Policies was in line with SA Objectives from the outset and the policies were refined and re-worded to ensure greater compatibility with the SA Objectives.

Allocations

1.16 The allocated sites that will deliver the LDP strategy have been assessed against the SA Objectives to ensure they contribute towards positive environmental, social and economic impacts on the county.

No-plan or business as usual scenario

1.17 The no plan or business as usual scenario was also assessed according to the requirements of the SEA Directive. This was to determine the sustainability effects in the absence of the plan and therefore further demonstrates the contribution of the new plan to sustainable development.

1.18 The key sustainability issues identified for Pembrokeshire have been analysed to assess the likely scenario if there was no LDP for the period to 2021. This prediction was difficult as it is dependant upon a wide range of unknown factors. The scenario is based on the likely implications for Pembrokeshire in the absence of a framework to guide the use and development of land. Where other plans, programmes and policies that may also influence these issues, such as national policy, these are given as an example.

Cumulative and in-combination effects

1.19 The temporal and cumulative nature of the predicted effects was explored where possible and details were provided in the commentary. The cumulative and in-combination assessments found that there were significant cumulative positive impacts predicted.

Habitats Regulations Appraisal

1.20 Habitats Regulations Appraisal (HRA) of the likely significant effects of the LDP on Natura 2000 sites is also required under Article 6(3) of the Habitats Directive (92/43/EEC) and under the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations). There are a number of Natura 2000 sites or European sites designated for their habitats and species which were considered. HRA has been carried out throughout production of the Plan, and reported separately but parallel to this SA process. The LDP

was assessed against the conservation objectives for the Natura 2000 sites and consulted on with the statutory consultees and as part of the wider LDP consultation. The LDP is unlikely to have a likely significant effect on European sites.

Next Steps

1.21 This SA Report will be subject to a full public consultation for a period of 6 weeks alongside the LDP.

1.22 This will be followed by the consideration of any alternatives suggested through the consultation process. Any substantial representations will also be discussed. Following examination of the LDP, there may also be further work undertaken. Monitoring of the LDP and SA will take place on adoption.

1.23 This SA Report presents an extensive SA of the detailed policies, and allocated land and also ensures that the LDP contributes to the achievement of sustainable development. This SA Report will then be consulted on alongside the LDP; any changes to this will be re-assessed and incorporated before the plan is adopted. Finally, the significant effects of implementing the plan will be monitored in parallel with annual monitoring of the LDP. This monitoring of the significant effects will be based on potential indicators which were suggested in the SA Scoping Report and Initial SA Report and have been developed as the plan progressed.

Commenting on this report

1.24 This report will be subject to public consultation from 26 January 2011 to 5.00 p.m. on 9 March 2011. Please comment on this SA Report using the response form in Appendix 10 of this report.

Chapter 2: Introduction

Introduction

Background

2.1 The Planning and Compulsory Purchase Act 2004 places responsibilities on local planning authorities, in preparing Local Development Plans, to do so 'with the objective of contributing to the achievement of sustainable development (S39), to prepare an appraisal of the Sustainability of the plan (the Sustainability Appraisal or SA) and to report on the findings of the appraisal (S62.6). European Directive 2001/42/EC requires that the environmental impacts of certain plans and programmes must be assessed through a Strategic Environmental Assessment (SEA). The SEA Directive is transposed into Welsh law by The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regulations).

2.2 The Welsh Assembly Government has decided that for development plans, the requirements of the SEA Directive are best incorporated into the SA³. Therefore, where reference is made to SA in this report, this will also include the requirements of SEA.

2.3 This SA Report sets out the sustainability appraisal of the Local Development Plan Deposit. The consultation responses from the Preferred Strategy were taken into account and guided development of the LDP Deposit. Guidance for SA and SEA has been set out in the LDP Manual published by the Welsh Assembly Government, which refers to the Office of the Deputy Prime Minister (ODPM) SEA guidance⁴ and the ODPM SA guidance⁵.

SA/SEA Process

2.4 There are five stages in the SA process comprising:

Stage A: Setting the context and objectives, establishing the baseline and deciding the scope;

Stage B: Developing and refining options/alternatives and assessing effects;

Stage C: Preparing the Sustainability Appraisal (SA) Report. This is known as the Environmental Report according to SEA Regulations, however this report uses the term SA Report throughout;

Stage D: Consult on the draft plan and the SA Report; and

Stage E: Monitor the significant effects of implementing the plan or programme on the environment.

³ Local Development Plan Manual, Welsh Assembly Government, February 2006, p. 21 (3.2).

⁴ A Practical Guide to the SEA Directive, ODPM, Scottish Executive, Welsh Assembly Government and Northern Ireland Department of the Environment, September 2005.

⁵ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

SA Scoping Report

2.5 The first stage of the SA process was to produce a Scoping Report (See SA Scoping Report www.pembrokeshire.gov.uk/planning). The report set the context and scope of the assessment and included a report on the current state of the environment, and on the social and economic situation in the County. Key sustainability issues were identified and SA Objectives set to address these sustainability issues. The LDP will be tested against these SA Objectives to ensure the plan contributes towards sustainable development. The SA Scoping Report was subject to consultation with the Statutory Consultees (Environment Agency, Countryside Council for Wales and Cadw) and other organisations with a social, economic or environmental remit and has been formally agreed. Consultation comments are available at www.pembrokeshire.gov.uk/planning. The baseline data and review of policies, plans and programmes produced for the SA Scoping Report have been updated periodically throughout the LDP production and are included as Appendices to this report (Appendices 7 and 8).

LDP Preferred Strategy

2.6 The Initial SA Report provided the SA and SEA of the Local Development Plan Preferred Strategy and should be read together with the LDP Deposit⁶.

2.7 The Preferred Strategy⁷ was developed from a Vision, Objectives and Options Background Paper (see Vision, Objectives and Options Paper⁸ and Preferred Strategy Document). Strategic options and alternatives were prepared to help determine the possible (and realistic) approaches to growth and spatial distribution that could be taken in the LDP. The options formed the basis for discussion with key stakeholders. The work undertaken for the Preferred Strategy has been used as a basis for the LDP.

LDP Deposit

2.8 The LDP Deposit Plan was developed by planning officers, in conjunction with specialists from other departments within Pembrokeshire County Council and externally through specific stakeholder group discussions. It incorporates a vision which is supported by objectives, together with strategic policies and land allocations which will deliver the vision.

LDP Vision

2.9 The vision for the LDP has changed as a result of consultation on the Preferred Strategy. It has been developed for the LDP from the Wales Spatial Plan vision and the Community Plan vision.

⁶ LDP Deposit: www.pembrokeshire.gov.uk/planning

⁷ LDP Preferred Strategy: www.pembrokeshire.gov.uk/planning

⁸ LDP Vision, Objectives and Options paper: www.pembrokeshire.gov.uk/planning

‘A network of strong communities supported by a robust, sustainable, diverse high value-adding economy underpinned by the Area’s unique environment, maritime access and internationally important energy and tourism opportunities’ (Vision for Pembrokeshire the Haven – Wales Spatial Plan 2008).

‘To ensure that Pembrokeshire is prosperous and that it remains vibrant and special’ (Emerging Pembrokeshire Community Plan 2009).

The LDP Vision:

“To ensure that Pembrokeshire is prosperous and that it remains vibrant and special by creating: a network of strong urban and rural communities in Hub Towns, Service Centres, Service and Local Villages supported by a robust, sustainable, diverse high value-adding economy underpinned by the Area’s unique environment, maritime access to the Milford Haven Waterway and Fishguard Harbour and internationally important energy and tourism opportunities.”

LDP Objectives

2.10 The 10 LDP Objectives were developed from the LDP vision and determine what sort of place the plan area should be (LDP Manual, section 5.5) and support how the Vision will be achieved. The LDP Objectives were derived from the evidence base and specific issues in the area. The LDP Objectives have changed following consultation with stakeholders and the public.

Mitigating and responding to climate change (A) and Improving access to goods and services (I)

- To retain best quality agricultural land for productive purposes.
- To minimise development on areas of land at flood risk.
- To promote housing development in settlements where good levels of services already exist to reduce the need to travel.
- To reduce the need to travel to access work, services and goods.
- To be efficient in the use of resources and energy.

Building on the County’s strategic location for energy and port related development (E)

- To ensure sufficient land is available for port and energy/renewable energy technologies both for research and for delivery in key sites on the Haven and in the Hub Towns.
- To improve connectivity across the County and particularly to the Hub Towns and Haven.
- To provide necessary infrastructure for development to take place.

Supporting the development of the distinctive role of Pembrokeshire's towns, especially within the Haven Hub (F), and Regenerating Town Centres (G)

- To strengthen and improve the retail offer.
- To strengthen Haverfordwest's role as a sub-regional centre.

Developing a quality visitor economy founded on a distinct sense of place and an outstanding natural and built environment (H)

- To encourage development that complements the natural and built environment.
- To improve the range and quality of attractions and accommodation.

Sustaining and enhancing the rural and urban economy (C)

- To reduce the need to travel.
- To facilitate agricultural diversification in rural areas
- To safeguard the mineral resource and manage its development.

Developing vibrant communities providing a range and mix of homes and local services (D)

- To provide sufficient land to meet the housing needs arising within the County Council's planning area.
- To provide housing which is affordable.
- To protect local culture and language.
- To enable the provision of community facilities.

Delivering design excellence and environmental quality (B) and Protecting and enhancing the natural and built environment (J)

- To protect and enhance the natural environment, particularly designated nature sites and protected species and habitats across the plan area.
- To manage waste sustainably.
- To conserve and enhance the historic environment.
- To achieve good sustainable design.

LDP Strategy

2.11 The LDP strategy is designed to deliver the vision for Pembrokeshire, meet the objectives of the Plan and respond to the issues identified to deliver sustainable development. It is derived from national and regional policy principles and an evaluation of economic, social and environmental factors and the key issues and characteristics that make Pembrokeshire unique.

2.12 The strategy focuses on enabling development that will:

- Improve the vitality and success of Pembrokeshire's towns;
- Improve the maritime, energy, tourism and knowledge economies; and
- Enhance the rural economy through facilitating the creation of additional jobs and housing opportunities for those living in the rural areas.

2.13 It includes a settlement strategy that aims to achieve a balanced distribution of new development between urban and rural Pembrokeshire.

Within the rural area, growth is focused on those settlements with a good level of service provision.

2.14 The Preferred Strategy considered alternative strategies. These alternatives included a strategy focusing growth mainly on the Hub Towns, and another directing growth to linked settlements in rural areas which in combination provided a range of services. A strategy for a more balanced distribution of growth, targeting those settlements with a good range of services and facilities, was determined to be the best approach to deal with the issues facing Pembrokeshire and to meet the Plan's vision and objectives. The levels of growth were assessed as part of the SA in Appendix 2.

2.15 This strategy will be implemented through developments that comply with 16 strategic policies and supported by general policies and allocations (see LDP Deposit, Chapters 5 and 6). The strategic policies include:

- An over-arching strategic policy on sustainable development that relates to all proposals.
- Strategic policies relating to specific land-uses and a range of topics that are within the influence of the planning system. These policies indicate the role that a particular land-use or topic has in achieving the vision and objectives for Pembrokeshire over the Plan period.
- A small number of area-based strategic policies, setting out appropriate scales and detailed locations for future development. The area-based strategic policies will deliver the spatial aspects of the vision and objectives and are also supported by general policies and allocations.

2.16 A total of 149 sites are allocated to provide the land to deliver the strategic and general policies.

2.17 Supplementary Planning Guidance (SPG) has been produced for the Plan on Affordable Housing, Development Sites, and Minerals Resource Buffer Zones. The LDP has been assessed in this SA Report, the SPG documents elaborate on how the Plan will be implemented, and they do not make any changes to the policies.

2.18 All new development will be expected to be sustainable and to reflect local character, in particular vernacular building styles and scales. New development will be expected to contribute towards the retention and wherever possible enhancement of local distinctiveness. Policies are included in the Plan to ensure that this happens.

Structure of this report

2.19 This SA Report is presented in 13 chapters:

Chapter 1: Non-technical summary of the report.

Chapter 2: Provides an introduction and background to SA and the LDP.

Chapter 3: Provides a summary of the Sustainability Appraisal Framework and SA methodology. The SA Framework outlines the SA Objectives and key

aims of these Objectives. The SA methodology describes the appraisal process.

Chapter 4: Assesses the LDP Vision against the SA Objectives.

Chapter 5: Discusses the compatibility of the LDP Objectives with the SA Objectives.

Chapter 6: Tests the Strategic Policies against the SA Objectives.

Chapter 7: Assesses the General Policies

Chapter 8: Assesses the land allocations against the SA Objectives.

Chapter 9: Presents a summary of the 'No Plan Scenario' or business as usual scenario

Chapter 10: Summarises the in-combination and cumulative effects of the LDP Deposit.

Chapter 11: Presents a summary of the Habitats Regulations Appraisal.

Chapter 12: Provides a summary of how the Plan has developed and the mitigation and changes made.

Chapter 13: In conclusion Chapter 13 provides a summary of the key conclusions of this report and identifies the next steps in the SA process.

2.20 Appendices provide further information: the full compatibility matrix for the LDP Objectives and SA Objectives (Appendix 1); the appraisal of the levels of growth (Appendix 2); appraisal of the Strategic Policies (Appendix 3); Appraisal of the General Policies (Appendix 4); the allocations are assessed in Appendix 5; Appendix 6 details the changes made to the Plan policies throughout the process. Appendices also include updated baseline data and review of plans, policies and programmes (PPPs) for information (Appendix 7 and 8). The requirements of the SEA Directive are set out in the ODPM guidance document and relate to various stages in the SA/SEA process (Figure 1, ODPM 2005). This is included in Appendix 9. The consultation response form is in Appendix 10.

2.21 What is NOT included in this Initial SA Report?

- Details which were included in the agreed SA Scoping Report
- Habitats Regulations Appraisal – the full report is supplied separately.

Chapter 3: SA Framework and SA Methodology

Sustainability Appraisal Framework and Appraisal Method

3.1 This section outlines how the Sustainability Appraisal framework (which incorporates Strategic Environmental Assessment) was used to assess the Local Development Plan against the SA Objectives set out in the Sustainability Appraisal / Strategic Environmental Assessment Scoping Report. The appraisal does not repeat any international, national, regional and local policy or objectives in accordance with guidance.

Sustainability Appraisal Framework

3.2 The SA Objectives are supported by 'aims' which guide the appraisal of the LDP against the SA Objectives (see SA Scoping Report).

3.3 The methodology used to develop the SA Objectives and aims was in accordance with SEA/SA guidance. The SA Scoping Report went out to statutory consultation and was agreed in January 2009. The SA Objectives and aims, detailed in the SA/SEA Scoping Report were informed by environmental objectives established under law, policy and from sustainability objectives of other relevant plans and programmes that may influence, or be influenced by, the plan; as well as the key issues identified through baseline data collection and consultation.

SA Objectives

3.4 The SA Objectives are organised under a list of topic areas (which were defined by guidance); they are not in a list of importance. The SA Objectives (in bold font) and key aims of these objectives used in this appraisal are as follows:

3.5 Topic Area: *POPULATION*

1. Develop and maintain a balanced population structure

- Address the issue of Pembrokeshire's ageing population
- Encourage younger people to stay within the County

3.6 Topic Area: *HUMAN HEALTH*

2. Promote and improve human health and wellbeing through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment

- Promote healthy living
- Reduce health inequalities
- Encourage walking, cycling and physical activity
- Improve access to open space
- Minimise health and well-being from road traffic incidents
- Minimise the health impacts from pollution

3.7 Topic Area: *EDUCATION AND SKILLS*

3. Improve education opportunities to enhance the skills and knowledge base

- Address the issue of low skills in the area
- Improve access to life-long learning and training opportunities
- Develop a strong skills base for employers
- Contribute towards improving employment opportunities and economic activity, thus in turn improving the quality of life of the population.

*3.8 Topic Area: TRANSPORT***4. Minimise the need to travel and encourage sustainable modes of transport**

- Reduce the need to travel through the design and location of new development
- The provision of public transport infrastructure
- Integrated transport systems
- Promotion of cycling and walking
- Promotion of car sharing schemes
- Efficient land use patterns which minimise the need to travel

*3.9 Topic Area: SOCIAL FABRIC***5. Provide a range of high quality housing including affordable housing including affordable housing to meet local needs****6. Build safe, vibrant and cohesive communities which have improved access to key services and facilities****7. Protect and enhance the role of the Welsh language and culture**

- Ensure that the housing needs of the County are addressed
- Housing should be resource efficient (e.g. energy and water)
- Housing should have good design
- Housing should be integrated with public transport and key services
- Address safety and crime issues

*3.10 Topic Area: ECONOMY***8. Provide a range of good quality employment opportunities accessible to all sections of the population****9. Support a sustainable and diverse local economy**

- Seek to guide improvement of employment opportunities which in turn will impact many aspects including: unemployment; job satisfaction; improved wages and quality of life.
- Support the regeneration of towns and local centres
- Good quality employment should encourage young people to stay in the area or return to the County, which will also help to balance the demographic profile

3.11 Topic Area: CLIMATIC FACTORS

10. Prepare for and reduce the impact of Pembrokeshire's contribution to climate change

- Reducing greenhouse gas emissions
- Supporting energy conservation and energy efficient design
- Promoting renewable energy regeneration and cleaner technologies
- Efficient land use patterns to minimise travel
- Sustainable transport methods
- New developments that have regard to risk, causes and consequences of flooding
- Promote sustainable drainage systems
- Reduce vulnerability of the built environment to the effects of climate change.

*3.12 Topic Area: AIR QUALITY***11. Maintain and improve air quality**

- Reduce greenhouse gas emissions
- Reduce the impacts from transport, industry and power generation on air quality
- Address the health impacts of air quality

*3.13 Topic Area: MATERIAL ASSETS (WASTE AND MINERALS AND USE OF RESOURCES)***12. Minimise the generation of waste and pollution****13. Encourage the efficient production, use, re-use and recycling of resources**

- Encourage resource efficiency e.g. efficient use of water and incorporating water conservation measures in new developments
- Efficient use of energy, minerals and aggregate, soils and all other resources
- Use of secondary and recycled materials is encouraged
- Waste reduction, re-use, recycling and recovery
- Alternatives to landfill such as composting facilities and energy from waste
- Restoration and after-care of minerals and aggregate sites

*3.14 Topic Area: WATER***14. Maintain and protect the quality of inland and coastal water****15. Reduce the impacts of flooding and sea level rises**

- Requirement that water quality objectives are achieved and quality is improved further including water for biodiversity and human uses.
- Effects of land-use on water and resources should also be minimised
- Also consider the topic of flooding and sea level rises

*3.15 Topic Area: SOIL***16. Use land efficiently and minimise contamination**

17. Safeguard soil quality and quantity

- Re-use of derelict and previously developed land (and buildings)
- Remediating contaminated land
- Minimising soil erosion and pollution to soils
- Loss of agricultural land

*3.16 Topic Area: BIODIVERSITY, FAUNA AND FLORA***18. Protect, enhance and value biodiversity**

- Protecting designated sites and enhancing their interest features
- Conserving and enhancing habitats in urban and rural areas
- Avoid further habitat fragmentation and encourage improved connectivity through the planning process
- Integrating protection and creation of habitats into the new design from the outset
- Promoting the biodiversity gain through planning
- Protecting biodiversity also impacts the economy through increased visitors

*3.17 Topic Area: CULTURAL HERITAGE (ARCHITECTURE, ARCHAEOLOGY, AND LANDSCAPE)***19. Protect and enhance the landscape and geological heritage****20. Encourage quality locally distinct design that complements the built heritage****21. Protect, enhance and value the built heritage and historic environment**

- Promotion of high quality design in keeping with its context in the landscape to support local distinctiveness, though recognize the role of innovation in the built environment.
- Promotion of sustainable construction methods is encouraged
- Increase of sustainable access and opportunities for enjoyment of the landscape, geological, built and archaeological heritage where appropriate.

Sustainability Appraisal of the LDP

3.18 This appraisal relates to the LDP Deposit. Firstly, the LDP vision and objectives were tested against the SA Objectives for compatibility and this is summarised in Chapter 4 and 5 (the full assessment Appendix 1).

3.19 Secondly, the 16 strategic policies and 41 general policies were assessed in detail against the SA framework objectives, this also takes account of their ability to progress the SA Objectives. The method employed in the appraisal process for the component parts of the LDP is outlined below.

3.20 Finally, the land allocations were assessed against each of the SA Objectives to assess their ability to progress the SA Objectives and determine whether the allocations were compatible with the SA Objectives. The allocated sites appraisal was aided by the initial site assessment carried out on all candidate sites (see the Site Assessment Report⁹).

Testing the LDP Vision

3.21 The LDP vision has been assessed against the SA Objectives to ensure that the Vision will meet these objectives. This was done using a matrix with SA Objectives along one column and a commentary of whether the Vision contributes to the SA Objectives.

Testing the Compatibility of LDP Objectives

3.22 The LDP objectives were tested for their compatibility with the SA Objectives. This was done in a matrix with the LDP objectives along one axis and the SA Objectives along the other (Appendix 1). The compatibility assessment was represented by:

- ✓ Objectives compatible
- ✗ Objectives not compatible
- ? Uncertain – dependent on other factors or further details

Assessing the LDP Strategic Policies and General Policies

3.23 The appraisal of the strategic policies was carried out by assessing the policies against the SA Objectives within a matrix. The structure of the table was developed based on guidance set out in the LDP Manual (LDP Manual, Section 6.4) which had been informed by the ODPM SA Guide (Task B3). The purpose of assessing options through the SA is to predict the social, environmental and economic effects of the policies being considered in the LDP. The commentary/explanation provided for each SA Objective sets out the reasoning behind the prediction of the effects of the policies and their ability to meet the requirements for sustainable development. In addition to the commentary/explanation column a further two columns were included in the table to determine whether the policy contributes to meeting the SA Objective and whether the policy is compatible with the SA Objective. The

⁹ Site Assessment Report

appraisal then includes an overall summary of the assessment of the policies. The 12 original strategic policies developed as part of the Vision, Objectives and Options Paper and then in the Preferred Strategy and were assessed in the Initial SA Report. The policies were developed further to the final 16 policies in the LDP Deposit.

3.24 The full appraisal of policies is included in Appendix 3 and 4. A summary of the assessments is provided in Chapters 6 and 7.

3.25 The strategic and general policies were assessed using a classification which identifies where:

- ✓ The policy contributes and/or is compatible with the SA Objective.
- ✗ The policy is incompatible with the SA Objective.
- 0 The policy has no direct relationship with the SA Objective.
- ? It is unknown/unclear whether the policy contributes and/or is compatible with the SA Objective.

3.26 Part of the appraisal of the policies includes assessment of the impact of any sustainability effects in relation to:

- Negative (adverse), neutral or positive (beneficial) effects;
- Direct or indirect;
- Short, medium or long term;
- Isolated or cumulative;
- Reversible or irreversible;
- Whether mitigation measures are realistically possible; and
- Level of uncertainty.

Assessment of allocations

3.27 The appraisal of the LDP allocations against the SA Objectives was carried out using a similar matrix. The candidate sites were pre-screened in the LDP Site Assessment Report.

3.28 The appraisal of the allocations was carried out using an options assessment approach within a table format. The main technique of the appraisal was to determine and predict the positive and negative effects of each of the allocations against the SA Objectives. The commentary/explanation provided sets out the reasoning behind the prediction of the effects and the ability to meet the requirements for sustainable development. The allocations were appraised using the key:

- + Potential positive effects
- Potential negative effects
- ? Uncertain/unclear what effects.
- 0 No relationship with the SA Objective

3.29 Part of the appraisal of the allocations also includes assessment where appropriate of the impact of any sustainability effects in relation to:

- Negative (adverse), neutral or positive (beneficial) effects
- Direct or indirect

- Short, medium or long term
- Isolated or cumulative
- Reversible or irreversible
- Whether mitigation measures are realistically possible
- Level of uncertainty

3.30 An overall summary of the assessment of the allocated sites is also presented. The full appraisal is included in Appendix 5. A summary of the assessments is provided in Chapter 8.

Chapter 4: Assessment of the LDP Vision with the SA Objectives

Sustainability Appraisal of the LDP Vision

4.1 Firstly, the LDP Vision was tested against the SA Objectives to ensure that the Vision supports the Sustainability Appraisal Objectives and works towards realising those SA Objectives.

SA Objective	Vision:	
	The LDP Vision: “To ensure that Pembrokeshire is prosperous and that it remains vibrant and special by creating: a network of strong urban and rural communities in Hub Towns, Service Centres, Service and Local Villages supported by a robust, sustainable, diverse high value-adding economy underpinned by the Area’s unique environment, maritime access to the Milford Haven Waterway and Fishguard Harbour and internationally important energy and tourism opportunities.”	
	+ - 0 ?	Commentary/ explanation
1. Develop & maintain a balanced population structure	+	The vision does not specifically mention the population of Pembrokeshire, however strong communities are referenced, and the aspirations of the vision will contribute to the maintenance of a balanced population structure, particularly through providing jobs for younger people and the rest of the population, and the economic support for the ageing population.
2. Promote & improve human health & well being through a healthy lifestyle, access to healthcare & recreation opportunities & a clean & healthy environment	0	The vision does not specifically reference health and well being.
3. Improve education opportunities to enhance the skills & knowledge base	0	No specific reference to education.
4. Minimise the need to travel & encourage sustainable modes of transport	0	No specific reference, however a sustainable economy would need to be supported by sustainable travel.
5. Provide a range of high quality housing including affordable housing to meet local needs	+	The vision references a network of strong urban and rural communities. This includes housing for these communities, and will include affordable housing to meet the needs of those within the community who require it.
6. Build safe, vibrant & cohesive communities which have improved access to key service & facilities	+	The vision to ensure that Pembrokeshire is prosperous and that it remains vibrant and special by creating a network of strong communities contributes towards this SA Objective positively.

7. Protect & enhance the role of the Welsh language & culture	+	The SA Objective is supported by the vision which states that Pembrokeshire remains vibrant and special.
8. Provide a range of good quality employment opportunities accessible to all sections of the population	+	The vision supports this SA Objective through specifying the robust, sustainable diverse and high value-adding economy. The economic well being of the county is directly linked with the provision of employment opportunities.
9. Support a sustainable & diverse local economy	+	The SA Objective is supported by the vision.
10. Prepare for & reduce the impact of Pembrokeshire's contribution to climate change	+	No specific reference to climate change, however aspirations that Pembrokeshire's economy will be sustainable underpinned by the environment and that Pembrokeshire remains a vibrant and special place contribute towards this SA Objective.
11. Maintain & improve air quality	+	No specific reference within the vision, however Pembrokeshire's prosperity is linked to a diverse economy underpinned by the Area's environment, and therefore air quality.
12. Minimise the generation of waste & pollution	+	No specific reference within the vision, however Pembrokeshire's prosperity is linked to a diverse economy underpinned by the Area's environment.
13. Encourage the efficient production, use, re-use & recycling of resources	+	No specific reference within the vision, however Pembrokeshire's prosperity is linked to a diverse sustainable economy underpinned by the Area's environment.
14. Maintain & protect the quality of inland & coastal water	+	No specific reference within the vision, however Pembrokeshire's prosperity is linked to a diverse sustainable economy underpinned by the Area's environment.
15. Reduce the impacts of flooding & sea level rise	+	No specific reference within the vision, however Pembrokeshire's prosperity is linked to a diverse sustainable economy underpinned by the Area's environment.
16. Use land efficiently & minimise contamination	+	No specific reference within the vision, however Pembrokeshire's prosperity is linked to a diverse sustainable economy underpinned by the Area's environment.
17. Safeguard soil quality & quantity	+	The vision references the importance of the unique environment within Pembrokeshire.
18. Protect, enhance & value biodiversity	+	The vision references the importance of the unique environment within Pembrokeshire and that it remains vibrant and special.
19. Protect & enhance the landscape & geological heritage	+	The vision references the importance of the unique environment within Pembrokeshire and that it remains vibrant and special.
20. Encourage quality, locally distinct design that complements the built heritage	+	The SA Objective is supported by the vision: the vision references the importance of the unique environment and that Pembrokeshire should remain vibrant and special.

21. Protect, enhance & value the built heritage & historic environment	+	The SA Objective is supported by the vision: the vision references the importance of the unique environment and that Pembrokeshire should remain vibrant and special.
Summary The vision contributes positively towards all SA Objectives. This emphasises the Plan's acknowledgment that the key principle to deliver the plan is sustainable development. The environmental, economic and social well being of the County should be improved as a result of this Plan.		

4.2 The assessment shows that the vision supports the SA Objectives and provides confidence that the Plan, through its objectives, policies and allocations will contribute significantly towards sustainable development and ensure that the aspirations of the vision are realised.

Chapter 5: Compatibility of the LDP Objectives with the SA Objectives

Appraisal of the LDP Objectives

5.1 The appraisal of the 10 LDP Objectives seeks to test their compatibility with the SA Objectives, this identifies any potential conflict or omission between both sets of objectives. The appraisal matrix (see Appendix 1) revealed that the objectives are broadly consistent with the Sustainability Objectives. In some instance, however, the appraisal indicated a level of uncertainty in relation to outcomes, as these were dependent on the nature and scale of development.

5.2 The matrix in Appendix 1 indicates that the majority of SA objectives are compatible with the objectives of the Local Development Plan, in that the achievement of one will not undermine the potential to achieve the other. There is uncertainty regarding whether some of the more environmental SA Objectives are fully compatible with the Plan's development-based objectives. All the objectives are however considered potentially compatible, as long as appropriate mitigation measures and conditions are imposed alongside planning permissions. Therefore, no objectives are considered to be incompatible with each other.

Chapter 6: Assessment of the Strategic Policies

Assessment of the Strategic Policies

6.1 The 16 strategic policies are assessed against the SA Objectives (see tables below). There is an assessment of whether the Policy contributes towards meeting the SA Objective, and whether the policy is compatible with the SA Objective.

6.2 The updated assessment also takes into account changes made to the strategic policies in the Preferred Strategy. Changes to the strategic policies were made following consultation and also to improve the performance against the SA Objectives.

6.3 Note that the general policies and allocated sites will also be subject to assessment (see Chapters 7 and 8).

6.4 The key used in the assessment is:

- ✓ The policy contributes and/or is compatible with the SA Objective.
- 0 The policy has no direct relationship with the SA Objective.
- ? It is unknown/unclear whether the policy contributes and/or is compatible with the SA Objective.

6.5 The effects of the policies considered in the assessment are:

- Negative (adverse), neutral or positive (beneficial) effects
- Direct or indirect
- Short, medium or long term
- Isolated or cumulative
- Reversible or irreversible
- Whether mitigation measures are realistically possible.
- Level of uncertainty
- Scale – local, county-wide, region/ cross-boundary

6.6 The full assessment of the strategic policies is detailed within Appendix 3. The following table provides the overall summaries of the policies.

Table 1: Summaries of strategic policy assessments

Strategic Policy	Summary of assessment against SA Objectives
SP 1 Sustainable development	All SA Objectives encourage or require development proposals to be sustainable. This strategic policy which is the overarching policy of the Plan requires the delivery of sustainable development (including positive environmental, social and economic impacts) and as such is compatible with each of the SA Objectives. The policy has the potential to help deliver the range of SA Objectives and hence contribute positively to development within the plan area by ensuring that the types of development that take place are appropriate for their location and built and designed in a way to achieve positive impacts.
SP 2 Port and energy related development	This policy presents various opportunities to help achieve some of the SA Objectives but it will depend on what development is decided upon and permitted. Development could contribute

	towards building new cohesive communities, support a diversification in the economy and improve human health and well being by improving the environment. New developments could follow sustainable principles and include renewable technologies to ensure good design. Port developments could help to reduce the impacts of climate change by being resource efficient and supporting energy conservation and renewable energy. Any new developments will also help support the local economy by providing job opportunities and potentially diversifying the economy. A potential negative impact of port development is the impact on water quality and the marine environment. During construction there would be disruption to marine habitats and an increase in marine activities and traffic could reduce water quality and increase pollution. Policies in the LDP will ensure any negative impacts are mitigated and minimised (GN 1, GN 2, GN 36).
SP 3 Employing land requirements	The specific employment allocations have been assessed separately.
SP 4 Promoting retail development	This strategic policy raises few concerns as it meets the majority of the SA Objectives. The specific location of development within the retail hierarchy is not known specifically, while some allocations are specified under GN 14, other retail proposals would be assessed against policies in the Plan. By focussing retail in existing centres this should help reduce or minimise the need to travel, protect the natural environment and provide access to services for local communities. By allowing further retail development in existing centres this should help reduce or minimise the need to travel, protect the natural environment and provide access to services for local communities. This policy in isolation and in combination with other policies is compatible with the SA Objectives. The promotion of retail development within defined town centres should contribute positively towards the conservation of land and existing town centre built environment. The provision of retail and leisure opportunities of an appropriate scale, nature, size and character may contribute to the aims within the Wales Spatial Plan Update 2008 which identifies renewal of town centres as key. In the wider context the provision of retail and leisure opportunities in locations which can be accessed via sustainable modes of transport may have positive social and environmental impacts.
SP 5 Visitor economy	Tourism in Pembrokeshire is a major generator for the local economy and provides employment opportunities within the

	County. The nature of tourism is diverse, different but interdependent activities and operations overlap with other leisure and recreation provisions, it therefore may be difficult to determine direct effects which have resulting from the policy and/or details of the policy. Due to the seasonality of the industry it is difficult to accurately identify effects which may influence the relationship between the policy and SA Objectives. The policy does require all developments to be located sustainably and enhance the environment and benefit local communities, it could therefore be concluded that the policy is sufficient to ensure social and environmental impacts will not be negative. The absence of detail within the policy makes it difficult to accurately assess the impact visitor economy may have. Greater detail is needed regarding where visitor development should be focussed for it to be considered 'sustainably located', such as appropriate location of structures for year round tourism – see GN 16 - 20. Also, greater detail is needed regarding 'benefit local communities' as there is potential for contradiction when trying to meet this objective, for example, visitor facilities may help support local facilities, but through the development of second homes and holiday accommodation without prioritising affordable housing, visitor economy may be at the expense of housing people.
SP 6 Minerals	In line with regional policy MTAN1 and GN 25 encourages re-use and recycling of materials, and GN 24, the restoration of old sites that is beneficial to the environment and landscape. This policy has limited social impacts and there are no direct influences on the population structure, human health and well being or education and skills. Indirectly the policy contributes to developing local distinctiveness by meeting local needs by providing local materials for housing developments. Directly the policy will benefit the economy by improving employment and providing stable, long term opportunities. This policy raises concerns regarding visual pollution and biodiversity; however as the policy will be implemented following national guidance, as set out in the policy statement, the sustainable approach should benefit the majority of the environmental and climatic SA Objectives in the long term. Some environmental effects depend on location; this will raise location-specific issues which can be addressed at the relevant stage. Mitigation can be dealt with in detailed policies in accordance with the regional plans and by Development Management. The policy has also been subject to Habitats Regulations Appraisal. Overall if the policy is approached in a sustainable manner the long term benefits should outweigh any short term consequences from an environmental perspective. The social implications are positive in the short and long term.

SP 7 Housing requirement	The approach taken to the housing requirements supports development throughout the county. The distribution of housing is defined in SP 12. The wide distribution and balanced scale of development between urban and rural settlements should contribute to maintaining a healthy rural population and prevent over development in areas of the County. The benefit to this approach in terms of access are two fold; reducing the need to travel to essential services and the potential to reduce distance travelled to home/employment which remains one of the major trip generators for the County. National awareness of issues relating to housing and impacts upon climate change is reflected at local level within this policy or through this policy in combination with one or more policies. Where housing development is likely to have an impact upon landscape, heritage and/or biodiversity the policy will work in combination with detailed policies to carry out mitigation and/or protection measures.
SP 8 Affordable housing target	Pembrokeshire's aging population has been identified as a trend which needs to be limited and where possible reversed. The provision of affordable housing as part of major housing developments and through land allocations should significantly contribute towards a balanced population and promote vibrant and cohesive communities through mixed tenure developments. The same impacts in terms of biodiversity, landscape and resource use apply to affordable housing developments as they would to non affordable housing developments, where potential impacts are considered likely this policy in combination with other detailed policies will be used to mitigate for protect where appropriate. There is currently a backlog of affordable housing need in Pembrokeshire, it is envisaged the amount of affordable housing developed under this policy will contribute to meeting the backlog, this may in the long term lead to improved health and well being.
SP 9 Welsh language	This policy has a limited impact on the majority of the SA Objectives and there is no relationship with the environmental objectives. The policy may impact on the social topics and potentially, depending on what mechanisms are introduced, may help maintain a balanced population structure and build cohesive communities. The policy may impact on education which in turn could contribute towards improving employment opportunities, diversifying economic activities and strengthening the local economy.
SP 10 Transport infrastructure and accessibility	The Regional Transport Plan has been developed taking into account sustainability objectives (developed in its own SA/SEA) and these have been considered in the LDP. Potential effects include the impacts that proposals for new and improved transport routes may have on the environment (air quality, surface water run-off, biodiversity, habitats and species) and existing buildings and structures (particularly those of historic or architectural interest). The policy could lead to greater road usage by means of private transport but there could be benefits if local access is improved and opportunities

	for sustainable travel enhanced. There could also be some indirect positive impacts in relation to the social SA Objectives – for instance improved access to employment opportunities, improvement of economic prosperity, support for the rural economy and benefits to tourism. Any development as a result of the Regional Transport Plans will also be subject to assessment at the project stage.
SP 11 Waste	This policy raises concerns regarding visual impacts and biodiversity, however the policy will be implemented following national guidance as set out in the policy statement and should therefore contribute to the majority of the SA Objectives within the plan. The impacts of waste sites and resources are location-specific issues which can be addressed at the relevant stage. Waste sites could be provided locally, which would reduce travel times. Environmental effects depend on location. Mitigation can be dealt with in detailed policies in accordance with the regional plans and by Development Management. The policy has been subject to Habitats Regulations Appraisal. GN 39 specifies allocated sites for the provision of new waste facilities and GN 40 proposes generic criteria for waste minimisation, re-use, recovery, composting and treatment proposals. GN 41 sets criteria for disposal of waste on land, which is now a last resort where other waste management solutions are unavailable.
SP 12 The Settlement Hierarchy	Locating housing according to the settlement hierarchy according to their functional characteristics and provision of services and facilities in all areas, including rural areas should ensure travel can be minimised and access to services and facilities is improved. Developing the complementary roles of hub towns will have positive economic benefits by reducing competition and allowing towns to develop their specialised roles. If services are divided between the towns rather than available in all of them this may increase travel although this can be mitigated with a choice of sustainable travel options within and between hubs. National planning policies and the detailed local development policies will deal with, soils, waste and flooding (TAN15, SP1, GN 1, GN2). Any impact on biodiversity, landscape and the built heritage will be prevented or mitigated by policies to protect them (GN 1, GN 36, GN 37).
SP 13 Settlement boundaries	Locating housing according to the settlement hierarchy according to their functional characteristics and provision of services and facilities in all areas, including rural areas should ensure travel can be minimised and access to services and facilities is improved. Developing the complementary roles of hub towns will have positive economic benefits by reducing competition and allowing towns to develop their specialised roles. If services are divided between the towns rather than available in all of them this may increase travel although this can be mitigated with a choice of sustainable travel options

	within and between hubs. National planning policies and the detailed local development policies will deal with, soils, waste and flooding (TAN15, SP 1, GN 1, GN2, GN 36). Any impact on biodiversity, landscape and the built heritage will be prevented or mitigated by policies to protect them.
SP 14 Hub towns	The complementary role of the Hub Towns will have positive economic benefits by reducing competition and allowing towns to develop their specialised roles. If services are divided between the towns rather than available in all of them this may increase travel although this can be mitigated with a choice of sustainable travel options within and between hubs. Other national planning policies and detailed local development policies will deal with soil protection, waste and flooding etc. There may be an impact on biodiversity, landscape and the built heritage etc. but any such impact can be prevented or mitigated by policies to protect them. The policy is location dependent and detailed policies and land allocations will dictate; where allocated in the Plan these have been assessed accordingly.
SP 15 Rural settlements	This strategic policy raises few concerns as it meets the majority of the SA Objectives. There could be ambiguity regarding the specific locations of development (as it could take place anywhere in the rural settlements) and consequently their exact impact on the surrounding environment is unknown. Strategic and General Policies will ensure that social, economic and environmental impacts are mitigated from the outset.
SP 16 The Countryside	GN 1 and GN 2 support this policy and the SA Objectives throughout by protecting Pembrokeshire's landscape and natural and built environment. The policy does not affect all of the social SA Objectives but may positively affect human health and well being over the long term. A cleaner environment promotes healthy living, physical activity and minimises health impacts from pollution. The policy will heavily impact the economy. Many tourism businesses in Pembrokeshire rely on the environment and would benefit from any enhancement, protection or improvement to improve economic prosperity. The policy is linked in with housing and will ensure that housing is high quality in terms of design and suitable in terms of location. Housing design can ensure resources efficiency (materials, water, energy) which in turn helps reduce the impact of Pembrokeshire's contribution to climate change. In terms of environmental issues this policy promotes, safeguards and enhances the majority of objectives by ensuring inappropriate development is not permitted. This will help reduce the impacts of flooding, protect the quality of coastal and inland water, protect and enhance biodiversity, the cultural heritage and historic environment.

Conclusions of Appraisal of Strategic Policies

6.7 The 16 strategic policies were assessed against the SA Objectives, most of the policies were compatible and contributed towards meeting the SA Objectives. The policies were assessed by the County Council's Sustainability Appraisal Officer with input from planning and specialist officers to predict their impacts with regard to the Sustainability Appraisal Objectives. Informal advice was also sought from the statutory consultees. Specifically, the SA helped to ensure that the development of the strategic policies was in line with SA Objectives from the outset and the policies were refined and re-worded to ensure greater compatibility with the SA Objectives. The development of the strategic policies is included in Appendix 6 for information and illustrates the changes made in response to the assessment and consultation.

Chapter 7: Assessment of the General Policies

Assessment of General Policies

7.1 The general policies of the Local Development Plan were assessed against the SA Objectives. A summary of the assessments against the SA Objectives is provided below. The full assessment is provided in Appendix 4.

7.2 The key used in the assessment is:

- ✓ The policy contributes and/or is compatible with the SA Objective.
- 0 The policy has no direct relationship with the SA Objective.
- ? It is unknown/unclear whether the policy contributes and/or is compatible with the SA Objective.

7.3 The effects of the policies considered in the assessment are:

- Negative (adverse), neutral or positive (beneficial) effects
- Direct or indirect
- Short, medium or long term
- Isolated or cumulative
- Reversible or irreversible
- Whether mitigation measures are realistically possible.
- Level of uncertainty
- Scale – local, county-wide, region/ cross-boundary

General Policies	
GN 1 General Development Policy	The policy provides a robust framework for the evaluation of the potential impacts of development. Its criteria should ensure that development is appropriate and compatible with its surroundings and that the natural environment is respected and protected. Whilst elements regarding density and design could be strengthened, these are covered by other GN policies. The policy when used with other Plan policies will ensure that development will provide both short and long term positive social, economic and environmental benefits. The reasoned justifications expand further on the policy to ensure the whole range of potential impacts can be addressed.
GN 2 Sustainable Design	The policy on Sustainable Design seeks to deliver more sustainable buildings and places by ensuring that all new development is designed and constructed to meet all relevant policy criteria and with low maintenance implications. This ensures that development is of good design; contributes to the natural and built environment; reflects local building styles and local character and distinctiveness; is prepared for climate change and is energy and resource efficient; contributes positively to the public realm; is inclusive to all users; and provides a safe and desirable environment. The impacts of the policy will be positive and apparent in the both the short and long term. The policy will also provide cumulative benefits to the natural and built environment in the Plan area.
GN 3 Infrastructure and New Development	New development places additional demands on infrastructure and services therefore developers are expected to make a contribution towards social, cultural and physical infrastructure. These contributions will impact positively on both communities and the environment.

GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	This policy impacts on a range of the SA Objectives. From a social perspective, human health and well being may benefit as a result of a cleaner environment and improved air quality. The policy directly influences the resource efficiency of housing development and will. The economy should benefit from a diversification in employment roles and an increase in opportunities which will help support a sustainable a local economy. The environment will benefit from this policy in the long term by reducing reliance the impact on resources and indirectly by reducing greenhouse gas emissions due to the use of renewable resources. This will reduce the impact and contribution to climate change and promote sustainable development.
GN 5 Employment Allocations	Allocated sites have been assessed separately.
GN 6 Employment Proposals	The specific site location of employment proposals is not known (excepting those allocations) however, the proposals will contribute towards the SA Objectives positively. Development has the potential to have adverse impacts on social and environmental Objectives. However, proposals will be assessed against policies in the Plan which seek to bring about significant social, economic and environmental benefits.
GN 7 Mixed-Use Allocations	Allocated sites have been assessed separately.
GN 8 Protection of Employment Sites and Buildings	The Policy will support most SA Objectives, particularly social and economic objectives. The protection of employment sites and buildings will ensure a supply of development sites which will support the economic well being of the Plan area.
GN 9 Extensions to Employment Sites	The policy contributes positively towards the social and economic SA Objectives. Development, including extensions to employment sites has the potential to impact upon the environment. Robust policies in the Plan will be used to assess all development proposals which will ensure positive environmental outcomes in terms of environmental quality, resource use, biodiversity and the built heritage.
GN 10 Farm Diversification	The policy would be considered in line with GN 1, GN 2, GN 36, and GN 37. The policy could deliver significant positive impacts on the social, economic and environmental SA Objectives through contributing to the local economy, providing jobs, sustaining rural communities, and potentially bringing traditional farm buildings back in to use.
GN 11 Conversion or Change of Use of Agricultural Buildings	The conversion or change of use of agricultural buildings provides opportunity to impact positively upon social, economic and environmental aspects. Development, including conversions to employment sites has the potential to impact upon the environment. Robust policies in the Plan will be used to assess all development proposals which will ensure positive environmental outcomes in terms of environmental quality, resource use, biodiversity and the built heritage.

GN 12 Town Centre Development	The policy should meet those SA Objectives aimed at strengthening the economy and housing offer of the County. The policy could also impact the built heritage. Most of the town centres within Pembrokeshire are within Conservation Areas. This could result in the re-furbishing of existing buildings which could enhance the appearance of the town centres. Town centre development also provides expanded opportunities for recreation and leisure purposes.
GN 13 Major Out-of-town development	The policy should meet objectives aimed at strengthening the economy of the County. Development proposals will also be assessed against policies in the Plan aimed at protecting and enhancing the environment.
GN 14 Retail Allocations	Allocated sites have been assessed separately.
GN 15 Small Scale Retail	This policy is compatible with many of the SA objectives and will contribute to meeting objectives linked to sustaining communities and reducing the need to travel to services. The policy would also provide employment opportunities and support the local economy.
GN 16 Visitor Attractions and Leisure Facilities	The policy will contribute positively towards the SA Objectives. New visitor attractions and leisure facilities will expand the visitor economy which is an integral part of the County's economy as a whole. New attractions and facilities provide benefits for residents as well as visitors via employment. While there is the possibility that attractions may be situated in a countryside location, while this will need strong evidence, new development would also be subject to robust policies in the Plan to assess the proposal. This will ensure that environmental impacts, including impact on landscape would be mitigated.
GN 17 Self-Catering and Serviced Accommodation	This policy directly and indirectly contributes to meeting many of the SA objectives linked to the economy and the built environment. The policy would contribute positively to providing facilities for visitors and residents.
GN 18 Touring Caravan and Tent Sites	The policy would have positive impacts upon the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary Out Liberty as no new sites or extensions to sites will be permitted. Where new sites are permitted these will be well placed to settlements and potentially provide community facilities. The policy benefits both visitors and residents. Proposals will also require environmental improvements in the site and the surrounding landscape.

GN 19 Static Caravan Sites	The policy would have positive impacts upon the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary Out Liberty as upgrading of touring caravan pitches to static caravans will not be permitted. New sites or extensions to existing sites will also not be permitted. Sites within or well related to settlements in the hierarchy would be permitted to upgrade to static sites. These will be well placed to settlements. Proposals will require environmental improvements in the site and the surrounding landscape. The replacement of visitor static caravans with wooden chalets with adequate screening and appropriate to the landscape would provide positive long term benefits. The sites also support the visitor economy and provide jobs.
GN 20 Site Facilities on Existing Caravan and Camping Sites	The policy provides significant opportunity to improve the quality of the tourism offer. Proposals would also incorporate the best practicable environmental standards covering all facets of development. This policy contributes positively to most SA Objectives.
GN 21 Seasonal and Holiday Occupancy	This policy is compatible with and would help to achieve a number of the SA objectives, particularly with regards to the economy and minimising impacts on landscape.
GN 22 Marinas	Allocated sites have been assessed separately. The policy for new or extended marinas contributes positively towards the SA Objectives. Development would provide employment and economic benefits. Given the nature of marinas, there is potential that they could adversely impact the marine environment. The policy provides a robust framework for assessing proposals and there is a strong emphasis on the protection and enhancement of biodiversity which will ensure the good quality environment on which the economy is reliant is protected.
GN 23 Prior Extraction of the Mineral Resource	The policy will provide a way to ensure that minerals are extracted prior to development, where the need is proven. This provides economic benefits and also is sustainable as the material would otherwise be obstructed by development. The process of extraction would be subject to permission and environmental impacts would be mitigated.
GN 24 Minerals Working	The policy allows for mineral workings and extensions to existing sites. This supports the economy and provides materials for building. The policy includes criteria that the mineral is required for an identified need which cannot be supplied from secondary or recycled materials or existing reserves. This potentially provides for positive impacts on resource use. Proposals will need to be assessed against other policies in the plan. Provision is made for landscaping and environmental protection.
GN 25 Recycled Waste Materials and Secondary Aggregates	The policy will provide positive benefits in terms of resource use. The policy also allows for the transportation by rail or water which will support the transport and climate change objectives. The criteria in the plan also provides for landscaping, groundwater protection, and the beneficial after-use of the site.

GN 26 Buffer Zones around Mineral Working Sites	The policy allows for mineral working sites to be buffered, therefore overcoming conflicts between mineral workings and other land uses. For example, buffer zones around mineral workings will ensure that sensitive land uses such as housing, hospitals and schools would not normally be permitted because of potential negative impacts (e.g. dust, noise, vibration). Designations for biodiversity (GN 36) are likely to preclude any future working of the mineral resource.
GN 27 Residential Development	This policy directly contributes to and is compatible with the majority of the SA Objectives.
GN 28 Residential Allocations	Allocated sites have been assessed separately.
GN 29 Local Needs Affordable Housing Provision	The policy contributes positively to the social SA Objectives by providing local needs affordable housing for people in Towns, Service Centres, and Service Villages, Large Local Villages and Small Local Villages. This would be subject to conditions or a planning obligation. Development which proceeds as a result of this policy would be assessed against other policies in the Plan this will ensure that environmental SA Objectives are met.
GN 30 Exception Sites for Local Needs Affordable Housing	This policy contributes to meeting the accommodation needs of those who cannot afford open market housing. In doing so it meets social SA Objectives linked maintaining a balanced population, improving health and wellbeing, meeting housing needs and cohesive communities and protecting and enhancing the Welsh language. The policy is compatible with SA economic objectives. There are also potential positive relationships with environmental objectives linked to design quality and protection of built heritage.
GN 31 Specialist and Supported Accommodation	This policy contributes to meeting the accommodation needs of people requiring specialist or supported accommodation. In doing so it meets social SA Objectives linked to maintaining a balanced population, improving health and wellbeing, meeting housing needs, cohesive communities and protection / enhancement of the Welsh language and is compatible with economic and environmental objectives, including reducing the need to travel.
GN 32 Gypsy Traveller Sites and Pitches Policy	This policy contributes to meeting the accommodation needs of Gypsy Travellers, in doing so it meets social SA objectives linked to maintaining a balanced population, improving health and well being, meeting housing needs and cohesive communities and indirectly contributing to improving education opportunities. The policy supports economic SA Objectives of supporting a diverse local economy, recognising the economic contributions that gypsy travellers may make to local communities. There are also potential positive relationships with environmental objectives linked to landscape and the environment as this policy should ensure sites are well designed, make efficient use of land, minimise contamination and appropriately located in the landscape.
GN 33 Community Facilities	This policy contributes to meeting community needs locally. In doing so it meets SA social objectives connected to a balanced population structure, cohesive communities, improving public health and wellbeing improving recycling. By ensuring that Community Facilities are well located to settlements this policy

	is likely to reduce the need for people to travel and to lend support to the strength of the Welsh language where this is prevalent. The policy supports SA economic objectives of, recognising the importance of local facilities in providing local employment. This policy in combination with other plan policies is compatible with SA objectives linked to protecting the environment.
GN 34 Protection and Creation of Outdoor Recreation Areas	This policy contributes to meeting community needs locally for recreation areas and leisure routes. In doing so it meets social SA Objectives connected to cohesive communities, improving public health and well being. By ensuring that recreation and open space are well located to settlements this policy is likely to reduce the need for people to travel and provision for leisure routes is likely to encourage more sustainable transport. The policy supports economic SA Objectives by recognising the role of some recreation facilities in providing local employment. This policy in combination with other plan policies is compatible with SA Objectives linked to protecting the environment, with positive linkages including those related to air and water quality.
GN 35 Protection of Open Spaces with Amenity Value	This policy contributes to meeting community needs locally for amenity open space. In doing so it meets social SA Objectives connected to cohesive communities and improving public health and wellbeing. The policy supports SA environmental objectives, with positive indirect linkages, including those related to air and water quality. By ensuring the retention of local amenity open space, well located to settlements this policy is likely to reduce the need for people to travel and to contribute to maintenance of air quality.
GN 36 Protection and Enhancement of Biodiversity	This policy contributes to the protection and enhancement of biodiversity. In doing so it meets social SA Objectives linked to improving health and well being and a clean and healthy environment, and is compatible with economic SA Objectives. The policy makes a positive contribution to environmental objectives and indirectly encourages design quality and support biodiversity in the historic environment.
GN 37 Protection and Enhancement of the Historic Environment	The policy is broadly compatible with social SA Objectives and meets the objective linked to improving health and wellbeing, and protecting and enhancing Welsh culture and is compatible with economic SA Objectives. The historic environment contributes significantly to the local economy, therefore the protection and enhancement is important. The policy makes a positive contribution to environmental objectives, including biodiversity, encouraging design quality.
GN 38 Transport Routes and Improvements	Allocated sites have been assessed separately.
GN 39 New Waste Management Facilities	Allocated sites have been assessed separately.
GN 40 Waste Minimisation, Re-use, Recovery, Composting and Treatment	The policy contributes to meeting the waste hierarchy requirements, in doing so it meets social SA objectives linked to improving health and wellbeing, and cohesive communities. The policy also includes criteria to protect the economy. There are also positive relationships with environmental objectives

	linked to climate change, waste minimisation, reuse and recycling. The policy should ensure sites are well designed, make efficient use of land, minimise contamination and are appropriately located in the landscape.
GN 41 Disposal of Waste on Land	The policy contributes to meeting the waste hierarchy requirements, in doing so it meets social SA Objectives linked to improving health and wellbeing. The policy does not conflict with economic SA Objectives. There are also positive relationships with environmental objectives linked to climate change, waste minimisation, reuse and recycling, protecting water and air quality, and potential positive relationships with landscape quality and biodiversity, efficient use of land, avoidance of contamination.

Conclusions of Appraisal of General Policies

7.4 The 41 general policies were assessed against the SA Objectives, most of the policies were compatible and contributed towards meeting the SA Objectives. The policies were assessed by the County Council's planning and specialist officers to predict their impacts with regard to the Sustainability Appraisal Objectives. Informal advice was also sought from the statutory consultees. Specifically, the SA helped to ensure that the development of the general policies was in-line with SA Objectives from the outset and the policies were refined and re-worded to ensure greater compatibility with the SA Objectives. The development of the policies is included in Appendix 4.

Chapter 8: Assessment of Allocations

Assessment of LDP Allocated Sites

8.1 The allocated sites are assessed against the SA Objectives. The full assessment of the sites is provided in Appendix 5. A summary of the appraisal for each of the sites is provided in this chapter. HRA was also undertaken and is included in a separate report (HRA Report).

8.2 The candidate site process and assessment is described in the Preferred Strategy (page 86) and a Site Assessment Report¹⁰ has been produced. A consultation was undertaken for candidate sites to be submitted. A total of 1100 candidate sites were received. These were subject to assessment which comprised 5 stages:

- The Stage 1 assessment looked at whether sites were within or adjacent to a land use constraint including constraints such as floodzones, biodiversity designations.
- The Stage 2 assessment looked at conformity with the Preferred Strategy and access issues.
- The Stage 3 assessment examined sites' proximity to settlements within the Settlement Hierarchy (within 100m).
- The Stage 4 assessment involved an assessment by stakeholders including organisations such as the Environment Agency Wales and Countryside Council for Wales.
- The Stage 5 assessment considered the scale and type of development proposed, and whether there was a need for the proposal. This stage also comprised the settlement boundary review methodology

8.3 Of the 1100 Candidate Sites submitted, 53 were identified as housing allocations. A total of 138 (including the 53 housing allocations) have been included in the Settlement Boundaries of Hub Towns, the Rural Town, Service Centres and Service Villages. A further 44 candidate sites are included within a Local Village Settlement Boundary. This candidate site assessment as part of the LDP process assisted the overall assessment and allocation of sites.

8.4 The candidate sites proposed for housing development together would provide an area of land many times greater than that required to meet the LDP housing requirement of 5600 units over the plan period. This has meant that the majority of housing candidate sites have not been allocated or included in settlement boundaries for development.

8.5 In some instances candidate site proposals that are not allocated or included within Settlement Boundaries may still potentially be able to gain planning permission under the proposed LDP policies, for example as exception sites for affordable housing or under criteria policies which permit development which is well related to settlement boundaries.

¹⁰ Site Assessment Report October 2010

8.6 The Site Assessment Report includes tables that follow the progress of each site at each stage of the assessment of candidate sites. In some instances part of a site was unacceptable but a part was suitable either for inclusion within a Settlement Boundary or as an allocation. In a few instances a site is allocated for a different use than that proposed by the applicant. Officers' summaries provide further analysis.

8.7 Proposed and potential mitigation was also included as part of the Sustainability Appraisal (Appendix 5).

8.8 Table 2: Summary of site allocation assessments

Housing sites	
Name/Ref	Summary
Haverfordwest - Hermitage Farm HSG/040/00269	This allocation constitutes a logical rounding off for housing development. The site is well related to the town centre. Traffic will affect a trunk road.
Haverfordwest - Slade Lane North HSG/040/00273	This site already has permission. The site will provide a significant amount of housing and also community benefits via planning obligations through a new school and improvements to other infrastructure
Haverfordwest - Slade Lane South HSG/040/00274	This allocation has permission. The site will provide a significant amount of housing and also community benefits through a new school and improvements to other infrastructure. The water course requires a buffer, and wildlife corridors should be retained.
Haverfordwest – between Shoals Hook Lane and bypass HSG/040/00275	This site is well related to the town centre. Traffic will affect a trunk road.
Haverfordwest - Scarrowscant / Glenover HSG/040/00106	The site will provide housing in Haverfordwest which has good access to sustainable transport and has access to services and facilities. Issues with sewerage will need investigation. The site is also on an aquifer.
Milford Haven - Steynton Thornton Road HSG/086/00223	This site will provide housing. Access is from the Thornton Road. Phasing may be required to coincide with Dwr Cymru Welsh Water Asset Management Plans.
Milford Haven - Steynton Greenmeadow HSG/086/00129	The site has permission for housing. Phasing may be required to coincide with Dwr Cymru Welsh Water Asset Management Plans.
Milford Haven - Steynton Myrtle Hill HSG/086/00226	This allocation has permission for housing (75 units). There are current issues with sewerage. Phasing may be required to coincide with Dwr Cymru Welsh Water Asset Management Plans.
Milford Haven - Hubberston West of Silverstream HSG/086/00095	This allocation is well situated within Milford Haven. There are current issues with sewerage. Phasing may be required to coincide with Dwr Cymru Welsh Water Asset Management Plans.
Milford Haven -	This allocation is well related to Milford Haven. There are

South West of The Meads HSG/086/00222	current issues with sewerage. Phasing may be required to coincide with Dwr Cymru Welsh Water Asset Management Plans.
Milford Haven - Castle Pill HSG/086/00318	This allocation relates to the housing provision of the site in Milford Haven. The site is adjacent to the Pembrokeshire Marine SAC. Policies will need to ensure not adverse effect. The planning application for this site also includes development of retail, water sports, and associated infrastructure and parking facilities. There are issues with sewerage in the Milford Haven area and the site contaminated.
Milford Haven - Hubberston Adjacent to Kings Function Centre, Dale Rd HSG/086/00002	This allocation has consent for 168 houses. The allocation is for 151 houses. There are current issues with sewerage; this will be addressed through the consent (08/0587/PA).
Neyland - East of Poppy Drive HSG/093/00066	This allocation is in a good location in Neyland, where there is access to facilities and services. There are issues with the sewerage network, therefore a study would be required.
Pembroke Dock - North of Pembroke Road HSG/096/00238	The site is well related to Pembroke Dock. There are sewerage issues therefore a study would be required.
Pembroke Dock - North of Imble Lane HSG/096/00231	This housing allocation relates well to Pembroke Dock. The sewerage network is an issue therefore a study would be required.
Pembroke Dock - East of Hill Farm, Imble Lane HSG/096/00233	This allocation relates well to Pembroke Dock. There are issues with the sewerage network, therefore a study will be required.
Pembroke - North & West of Railway Tunnel HSG/095/00154	This allocation relates well to Pembroke and is close to facilities and services.
Pembroke - Adjacent to Monkton Swifts HSG/095/00153	This allocation is well related to Pembroke. There are issues with the sewerage system therefore a study would be required.
Pembroke - Adjacent to Long Mains & Monkton Priory HSG/095/00147	This site already has permission. The site is well located for Pembroke, and has access to services and facilities. There are issues with the sewerage network, therefore a study would be required.
Pembroke - North of Gibbs Way HSG/095/00144	This site (part of which has been developed already) is well related to Pembroke. The site has issues with sewerage and therefore a study would be required.
Pembroke - South of Gibbs Way HSG/095/00144	Part of the allocated site has permission is well related to other housing development in the area. There are issues with sewerage in the area; a study would be required.
Fishguard - Maesgwynne Farm HSG/034/00215	This large site with permission, has issues with sewerage, therefore this would need to be addressed as part of the development. The site relates well to Fishguard.
Fishguard -East of	This site is adjacent to an area already developed. There is

Maesgwynne HSG/034/00165	limited capacity available in the sewerage network, therefore this would need to be addressed.
Fishguard - Old Infants School HSG/034/LDP/01	This site would allow re-development of brownfield land. It is well related to the town.
Narberth - West of Bloomfield Gardens HSG/088/00078	This allocation is well related to Narberth and will provide affordable housing. There are current issues with the sewerage network therefore a study would be required. A buffer area of 7 metres would be required from the watercourse that runs on the edge of the site. Density should reflect the adjacent housing development.
Narberth - West of Rushacre HSG/088/00077	This allocation (consented) is well related to Narberth and could provide affordable housing. There are current issues with the sewerage network therefore a study would be required. A buffer area of 7 metres would be required from the watercourse that runs on the edge of the site. Density should reflect the adjacent housing development.
Johnston - Adjacent to Milford Road HSG/048/00038	This allocation has a planning application which has not been decided yet. There are known issues with the sewerage network therefore a study would be required. This site would provide housing which relates well to Johnston, has good transport links and access to facilities and services.
Letterston - Court Meadow HSG/053/00009	This site is well related to Letterston and will provide housing where there is access to services and facilities. Sewerage is a current issues therefore a study would be required prior to development.
Crymych - Between the School & Station Road HSG/030/00043	This allocation provides a logical housing site within Crymych. It is a service centre providing good access to facilities and services. There is limited capacity at the sewerage treatment works therefore phasing may be required to coincide with Dwr Cymru Welsh Water Asset Management Plans. The National Park has also allocated a site within Crymych (HA750, Depot Site). This site is allocated for 15 units and is unlikely to impact upon the PCC LDP.
Crymych - East of Waunaeron HSG/030/LDP/01	This allocation provides a logical housing site within Crymych. It is a service centre providing good access to facilities and services. There is limited capacity at the sewerage treatment works therefore phasing may be required to coincide with Dwr Cymru Welsh Water Asset Management Plans. The National Park has also allocated a site within Crymych (HA750, Depot Site). This site is allocated for 15 units and is unlikely to impact upon the PCC LDP.
Kilgetty - Extension to James Park & Cotswold Gardens HSG/050/00042	This allocation relates well to Kilgetty, where there is access to facilities and services. Part of the site has outline planning permission. There are issues with sewerage in the area, and therefore phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Kilgetty - Land to the Rear of Newton Hall HSG/050/00043	This allocation relates well to Kilgetty, where there is access to facilities and services. There are issues with sewerage in the area, and therefore phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Kilgetty - Land	This allocation has a planning application which has not been

West of Stepside School HSG/050/00041	determined yet. The site is a logical position between the school and existing development.
Kilgetty - Land to the South of Kilvelgy Park HSG/050/00044	The site relates well to Kilgetty, where there is access to facilities and services. There are issues with sewerage in the area, and therefore phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Abercych - Adjacent to Waterloo Cottage HSG/001/LDP/01	A small part of the site has permission. Access is an issue and a low density would be appropriate, particularly due to the topography.
Begelly - North of New Road HSG/003/00024	This development site is well related to Begelly, and has access to a range of services and facilities. There are current issues with the sewerage network therefore these would need to be looked at.
Blaenffos - Adjacent to Hafod HSG/006/00003	This allocated site will provide housing within the settlement of Blaenffos. Development of the site will need to reflect the density of surrounding housing. Open space should be incorporated and include the areas of semi-natural neutral grassland.
Boncath - North of Cilfan y Coed HSG/007/LDP/01	This site relates well to Boncath. The site would need to be developed at a low density due to the nature of the site.
Broadmoor - Northwest of Lyndhurst Avenue HSG/008/LDP/01	The development site is well related to Broadmoor. It provides an opportunity for housing within a settlement which has access to some facilities. Due to the sewerage issues the site would need to be phased for development to link in with Dwr Cymru Welsh Water improvement programmes. There are bats near the site and therefore this impact on them should be minimised.
Cilgerran - Adjacent to Holly Lodge HSG/020/00062	This allocation is well related to Cilgerran. There are known issues with sewerage therefore development should be phased to link in with Dwr Cymru Welsh Water improvement programmes
Clarboston Road - West of Ash Grove HSG/022/00012	The site is well related to the settlement and has permission for part of the site.
Clunderwen - Depot Site HSG/152/LDP/01	This allocated site in Clunderwen relates well to the village and would provide housing on a brownfield site. There are issues with sewerage in the area, and therefore phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Cosheston - South of Tinkers Fold HSG/025/00028	The allocated housing site is within Cosheston, it is well related to the settlement. Development will need to ensure that there are no detrimental effects on the Conservation Area. Frontage plots would be most appropriate.
Croesgoch - OS 7445, North of the Forge HSG/028/00012	This site relates well to Croesgoch. A buffer would be required along the watercourse. Known issues with the sewerage network mean that development should be phased to link in with Dwr Cymru Welsh Water improvement programmes.
Croesgoch - East of the Forge HSG/028/00013	This allocation is not consented. A buffer would be required along the watercourse. Known issues with the sewerage network mean that development should be phased to link in

	with Dwr Cymru Welsh Water improvement programmes.
Crundale - Opposite Woodholm Close HSG/029/00014	This allocation has outline permission and is well related to the settlement. There is a minor aquifer under the site therefore measures would need to be taken to ensure that this is protected from contamination.
Crundale - Land at Cardigan Slade HSG/029/00017	This allocation has outline permission and is well related to the settlement. A buffer area would be required to ensure protection of the watercourse and well on the edge of the site.
Eglwysrw - South West of the School HSG/033/00035	This site which has a planning application which is not determined yet is well related to the settlement. Network upgrades may be required to the sewerage system.
Hayscastle Cross - Land Opposite Barrowgate HSG/041/LDP/01	This small site is well related to the settlement. Due to the nature of the site, frontage plots would be appropriate. Phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Hook - Rear of Pill Road HSG/044/00050	This allocation would provide 15 units within a site well related to the settlement. Phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Houghton – Nursery HSG/045/00008	This site has outline permission for 15 dwellings. It is well related to the settlement.
Hundleton - East of Bentlass Road HSG/046/00015	This allocation is consented for 30 units – this could be changed to 40 units if the consent lapses. There is limited capacity in the sewerage works. A buffer would be required for the watercourses on site.
Jeffreyston - Rear of Beggars Roost & Sunny Side HSG/047/LDP/01	This allocated site is within a small settlement which has a range of local facilities, including a school and a public house, although there are no public sewers. Part of the site is consented. The retention of trees and hedgerows should be maximised where possible.
Lamphey - South of Cleggars Park HSG/052/00011	This allocation relates well to Lamphey. Density of housing should reflect adjacent development.
Llandissilio - Pwll Quarry Cross HSG/060/LDP/01	This allocated site relates well to Llandissilio, providing further housing opportunities. There are known issues with the sewerage network therefore development would need to be phased to link in with the Dwr Cymru Welsh Water improvement plans.
Llanddewi Velfrey - North of the Village Hall HSG/057/LDP/01	This small allocation would provide housing in Llanddewi Velfrey. The site is within a village where there is access to services and facilities. The site should be allocated at a density to reflect the current housing.
Llangwm - Opposite The Kilns HSG/063/00024	The allocated site is within a village which has access to a variety of facilities and services. There are current issues with sewerage, therefore a study would be required. Potential improvements by Dwr Cymru Welsh Water mean that development should be phased. An archaeological assessment would be required given the location.
Maenclochog - North West of the Globe Inn HSG/081/LDP/01	This site allocation relates well to the settlement. Recreational open space is to be included as part of the development.
Martletwy - West of	This small allocated site will provide housing within a small

Post Office Farm HSG/083/LDP/01	settlement. There is no public sewer and the watercourse to the south of the site would need to be buffered. Density of development would need to be low to reflect the surrounding development.
Mathry - South of the Woodturner's HSG/085/LDP/01	This small allocated site would provide housing within Mathry. The site is well related to the settlement, though is within the Conservation Area, therefore development would need to ensure no adverse impact.
Milton - West of Milton Meadows HSG/087/LDP/01	This allocated site is well related to Milton, , a village with access to services and facilities, however there are potential issues with access – road would possibly need widening. Development would need to connect to the public foul sewer. There are European bats near the site therefore any essential lighting schemes should be minimised and directional or low level lighting used. An archaeological survey would be required.
Penally - North of The Paddock HSG/097/LDP/01	This allocation relates well to Penally, with a range of services and facilities. There are issues with sewerage in the area, and therefore a phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Penally - Penally Heights HSG/097/LDP/02	This small allocated site is well related to the settlement. The site should be allocated at a low density to reflect the surrounding area.
Pentlepoir - Land adjacent to Coppins Lodge HSG/099/LDP/01	The allocated site provides the opportunity for further housing development within the large village of Pentlepoir. There are issues with sewerage in the area, and therefore phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Pont yr Hafod - Land Opposite School HSG/103/LDP/01	The site is well related to the settlement. Phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Puncheston - Opposite Bro Dewi HSG/108/LDP/01	The site relates well to the settlement. There are historic assets near the site therefore an archaeological assessment may be required. Phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan. The density of the site would need to reflect surrounding development.
Puncheston - West of Awelfa HSG/108/LDP/02	The site relates well to the settlement and will provide housing in a small settlement. Phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Robeston Wathen - South of Robeston Court HSG/113/LDP/01	The site relates well to the settlement, however development cannot be commenced before the road is de-trunked. Recreational open space should be included. Phased development to align with the Dwr Cymru Welsh Water improvements under their Asset Management Plan.
Roch - East of Pilgrim's Way HSG/114/LDP/01	The allocated site will provide housing in a settlement with access to some services and facilities.
Rosemarket - Opposite The Glades	The allocated site is well related to the settlement. The watercourse and pond will require a buffer.

HSG/116/LDP/01	
Sageston - South of the Plough Inn HSG/015/00022	This allocated site is well related to the settlement and has good access. Density of housing should reflect the surrounding development. The sites is near European bat sites, therefore trees and hedges should be retained where possible and low-level or directional lighting should be used.
Simpson Cross - East of Hill Lane HSG/119/LDP/01	The allocated site is well related to the settlement with access to some facilities and services. The allocation may need to be phased for development to align with Dwr Cymru Welsh Water improvements.
Spittal - North West of Wesley Way HSG/120/00018	Part of the site is permitted. The sewerage network is scheduled for improvements in Dwr Cymru Welsh Waters asset management plan.
St Dogmaels - Awel y Mor Extension HSG/122/00035	This allocated site is an extension to a previous allocation. Ecological assessments will be required.
St. Florence - North of Parsons Green HSG/123/LDP/01	The site is well related to the settlement. Phasing may be required to coincide with Dwr Cymru Welsh Water Asset Management Plans.
Templeton - South of the B4315 HSG/132/00030	This allocation is well related to Templeton, and half the site has been consented, with an application in for the remainder of the site. Housing density should reflect adjacent areas.
Templeton - South of the Boars Head Junction HSG/132/LDP/01	The site is well related to the settlement and would provide further housing. This site also provides an opportunity for road improvements, taking pressure off the Boars Head junction.
Tiers Cross - North of Bulford Road HSG/135/00004	This site is well related to a village which has access to some facilities.
Wolfscastle – opposite Haul y fryn HSG/149/LDP/01	This site offers a well related site for housing. There are potential highway constraints. An archaeological assessment should be carried out.
Strategic Employment Sites	
Name/Ref	Summary
Blackbridge, Milford Haven S/EMP/086/LDP/01	The site would make a significant contribution to employment opportunities in the plan area, and also is an opportunity to re-develop a derelict and contaminated site.
Pembrokeshire Science and Technology park, Pembroke Dock S/EMP/096/00001	This largely brownfield site would make a positive contribution towards employment opportunities in the area.
Withybush Business Park, Haverfordwest S/EMP/040/00001	Development of infrastructure has already commenced on this large strategic employment site, The site incorporates some pockets of existing employment development and is located in an area characterised by employment, airfield and agricultural developments. The site would contribute to employment opportunities in the plan area.
Trecwn S/EMP/136/0001	Development of this brownfield site could provide for re-use of land which has good transport links and would provide employment opportunities. The proximity to the Cleddau

	Rivers SAC would need appropriate assessment and mitigation at a planning application level. Development is within the C2 flood zone - a strategic flood consequences assessment would be required.
Local Employment Sites	
Name/Ref	Summary
Merlins Bridge Creamery Extension EMP/040/00003	The extended site offers potential for a larger employment site which should be beneficial to the local economy. The site is adjacent to a tributary of the Cleddau Rivers SAC and also abuts the C2 flood zone. Strong policies will be in place to ensure that issues such as flooding, water quality and biodiversity will be sufficiently accounted for.
Withybush North of Business Park EMP/040/00005	The development site is in a location well related to other employment sites in the area, and where access is available. The site will bring employment benefits to the area.
Withybush East of Business Park EMP/040/00004 and /040/00009	The development site is in a location well related to other employment sites in the area, and where access is available. The site combines a number of smaller sites. The site also incorporates two fields that were previously allocated for car retail purposes. Surface water is an issue in this area and would need to be addressed. The site will bring employment benefits to the area.
Haven Head Business Park Northern Extension Milford Haven EMP/086/00001	The site is related well to Milford Haven and the allocation of employment sites in the area is a positive effect. Strong policies will be in place to ensure that issues such as flooding, water quality and biodiversity will be sufficiently accounted for.
Dale Road, Hubberston EMP/086/00002	The site is related well to Milford Haven and the allocation of employment sites in the area is a positive effect. Strong policies will be in place to ensure that issues such as flooding, water quality and biodiversity will be sufficiently accounted for. The contamination at the site would be remediated as part of the development, bringing positive environmental effects.
Adjacent to Marble Hall Road, Milford Haven EMP/086/LDP/01	The site is well related to Milford Haven and would provide employment. Contamination due to the past use of the land does mean that extensive remediation of the site would need to be undertaken in conjunction with development.
North of Honeyborough Industrial Estate EMP/093/00001	In terms of available land in Neyland, this allocated site represents the best location for employment development, creating employment opportunities and contributing to the local economy.
Goodwick-Former Dewhirst Factory EMP/034/LDP/01	This site is a brownfield former employment site which relates well to the existing settlement. Development would improve this disused site, and would also provide employment opportunities. Development would need to take into account protected species at Goodwick Moor and build in any mitigation.
Goodwick- Parrog EMP/034/LDP/02	The site is allocated for employment use and is well related to the town. Due to its location in a C2 flood zone a Flood Consequences Assessment will be a requirement with any application.
Crymych - adjacent to	The site adjoins existing employment premises and is easily accessed from the main road. Its location slightly outside the

Riverlea / opposite Llygad-yr-Haul EMP/030/00001	settlement could provide positive impact on Crymych, by directing a large employment site away from the historic centre of Crymych to a less sensitive location.
Celtic Link Business Park, near Sceddau EMP/034/00006	This allocation has employment units already on site and transport links to Fishguard and the south. The site will provide employment opportunities and support the local economy.
A4115, Templeton EMP/132/00001	This new allocation will provide employment opportunities, and contribute to the local economy. Transport road links are good.
Old Station Yard, Letterston EMP/053/00001	This site already has industrial/employment use therefore further development will enhance employment opportunities in Letterston.
Mixed Use	
Name/Ref	Summary
Haverfordwest-Old Hakin Road MXU/040/01	The site will provide employment, and housing in Haverfordwest. Traffic from the Old Hakin Road will affect the trunk road.
Narberth- Plain Dealings Farm MXU/088/01	The site will provide employment and housing in Narberth. The site relates well to other employment sites in the area.
Johnston - Arnold's Yard MXU/048/01	This allocation could provide housing and employment for the area, and other compatible uses. The transport links are good. Contamination issues would need addressing.
Retail allocations	
Name/Ref	Summary
Fred Rees Site, Haverfordwest RT/040/01	The site is well related to the town centre and providing retail opportunities could improve the town centre and reduce the need to travel widely for retail. The site is adjacent to the Cleddau Rivers SAC and will need to ensure any development does not impact the SAC.
St Govans Centre, Pembroke Dock RT/096/01	This under-used, brownfield site is in a good location in the town centre and could lead re-generation of Pembroke Dock and provide jobs
The Old Primary School Site, Fishguard RT/034/01	This site represents a prime location within Fishguard, an outline consent is in place for a supermarket. Risk assessment in terms of the potential contamination would need to be undertaken, along with a traffic assessment. The site will contribute to the local economy.
The Old Primary School Site, Narberth RT/088/01	This site is a good location within the town centre, and has parking facilities in place. Retail development will contribute to the local economy and provide employment opportunities.
Kingsmoor foodstore allocation, Kilgetty RT/050/01	The site is well related to Kilgetty. Development would provide job opportunities and would also contribute to the local economy.
Marinas	
Name/Ref	Summary
Martello Quays, Pembroke Dock MAR/096/LDP/01	This site is permitted for development and is allocated as a marina and associated leisure and residential development. This would contribute to the regeneration of Pembroke Dock. Designs would need to be sympathetic to the Conservation

	Area and historic buildings and ancient monument.
Fishguard Harbour MAR/034/LDP/01	This site would bring positive economic benefits including employment opportunities and contribute to the visitor economy. Given the nature of the development, effects on water quality should be minimised and take into account protected species.
Specialist and Supported Accommodation	
Name/Ref	Summary
Park House, New Hedges SSA/089/01	The site will provide specialist accommodation providing benefits to those in need of specialist and supported accommodation.
Gypsy sites	
Name/Ref	Summary
Withybush Gypsy Site	The site will provide housing for gypsy travellers as identified by a needs assessment. The site is close to the C2 flood zone therefore sustainable drainage systems would be needed.
Catshole (Castle) Quarry	The site will provide housing for gypsy travellers as identified by a needs assessment. The site is close to the C2 flood zone therefore sustainable drainage systems would be needed.
Kingsmoor Common, Kilgetty	This site will provide housing for gypsy travellers as identified by a needs assessment. The site is adjacent to the C2 flood zone therefore sustainable drainage systems would be needed.
Community facilities	
Name/Ref	Summary
Slade Lane School Site, Haverfordwest CF/040/01	The site will provide a new primary school to provide education for residents of the Slade Lane housing sites. Access would be provided through the Slade Lane residential development as it proceeds.
Withybush Hospital Extension, Haverfordwest CF/040/02	The site will provide a hospital extension which provides greater access to healthcare and will also provide employment opportunities. The site is near the Cleddau Rivers SAC, and hedgerows should be retained where possible.
St Marks VA School, Haverfordwest CF/040/03	The site will provide an extension to the school premises.
Pennar CP School, Pembroke Dock CF/096/01	The site will provide improved access and an extension to the school premises.
Monkton Cemetery, Monkton CF/095/01	The site will provide an extension to the cemetery site.
Popehill, Johnston CF/048/01	The site will provide an extension to the cemetery site. There could be issues with groundwater due to the proximity to the quarry.
Freystrop Cemetery, Freystrop CF/035/01	The site will provide an extension to the cemetery site.
Haverfordwest school CF/040/04	The site would provide a new school, and therefore provide upgraded facilities for education in Haverfordwest.

Road Improvements allocations	
Name/Ref	Summary
WAG - A40 Llanddewi Velfrey to Penblewin – WAG Phase 3 scheme	The WAG improvement schemes were included in the National Transport Plan and these were subject to SEA. No adverse comments were made in relation to the scheme.
Regional Improvement Scheme - Improvement to the A40 west of St. Clears (including dualling, subject to proving the business case)	The scheme would be beneficial to the residents, businesses and visitors. Impacts from run-off should be dealt with.
Local road improvement scheme - Northern Distributor Network – Bulford Road link (Johnston to Tiers Cross)	Extract from RTP SEA – To provide a replacement 2.5km road link and better road access for HGVs and other traffic from the A4076 Trunk Road at Johnston to the nationally important oil and gas terminal, storage, refining and other development sites to the west of Milford Haven. The link will form a major part of a Milford Haven Relief Road, intended to remove heavy and through traffic from the town centre of Milford Haven. In addition, it will give relief and improved safety to the residential communities of Johnston and Tiers Cross. The link will replace a largely single track road with passing places. No changes have been made to the assessment. No new significant effects have been identified.
Local road improvement schemes - Pembroke Community Regeneration Project Phase 1 (Bridgend Terrace diversion) and Phase 2 (Bush Hill to Monkton bypass route)	Recommendations resulting from the Stage 1 and 2 studies into this project are as follows: i. A full extended bypass from the TRA 477 via Bush Hill and Monkton to St Daniel's Hill ii. A Bridgend Terrace Diversion iii. Traffic management of Main Street and Westgate Hill within Pembroke iv. Traffic management and some highway improvements to connecting routes outside Pembroke v. Sustainable transport initiatives. Using information in the WelTAG assessment, the assessment of the scheme on the SEA objectives has been revised. Based upon information currently available the overall effect would be positive due to environmental improvements associated with reduced traffic congestion. However the new bypass is likely to have a negative effect on biodiversity, as a result of potential effects on two SACs, while the effect on historic assets and landscape/townscape is uncertain. No new significant effects have been identified.
Local road improvement scheme - Blackbridge Access	Extract from RTP SEA – Waterston Bypass (RTP project no. 18) This scheme is within the prioritised programme within the RTP. However, it was not addressed in the Environmental Report and is therefore covered by this addendum.

Improvement and Waterston bypass	The bypass is proposed to relieve traffic through Waterston associated with recent developments such as the new LNG terminal on the former oil refinery site. The bypass has the following objectives: i. Facilitate the safe and efficient movement of existing traffic movements through Waterston. The daily 2-way traffic flow is about 3,500 vehicles with approximately 7.5% HGVs (inclusive of buses). ii. Improve the safety of all road users. iii. Relieve Waterston Village of through traffic and particularly heavy vehicles. iv. Improve access to the Waterston energy and employment sites. v. Improve pedestrian and cycle facilities. The bypass is anticipated to have positive significant effects on access to services and safety. The significance of effect on the majority of other objectives is uncertain without further information on the existing situation and the scheme proposals. No new significant effects have been identified. Blackbridge Access Improvement (RTP project no. 19) This scheme is within the prioritised programme within the RTP. However, it was not addressed in the Environmental Report and is therefore covered by this addendum. This proposal is to provide a good standard Road from Blackbridge to/from Waterston and the A477 and Trunk Road network. The overall effect of the new access is difficult to assess without further specific scheme information. However, it is likely to have a negative impact upon objectives to reduce greenhouse gas emissions as it would promote development at Blackbridge and therefore generate traffic emissions. No new significant effects have been identified.
Local road improvement schemes - Southern Strategic Route – A 477 Nash Fingerpost to Energy Site corridor enhancement	Extract from RTP SEA – Southern Strategic Route – A477 Fingerpost Junction to Energy Site Corridor (RTP project no. 13) This scheme is within the prioritised programme within the RTP. However, it was not addressed in the Environmental Report and is therefore covered by this addendum. The Southern strategic route proposes to widen, re-align and otherwise improve roads passing from the north east to the south west of Pembroke, running through the town centre. The route runs from the A477 Trunk Road “Fingerpost” junction to the energy sites on the southern shore of the Haven. The current energy sites comprise the operational Chevron Refinery and the site of the former Pembroke Power Station which is to become a new gas fired power station. Overall the effect of improving the southern strategic route is anticipated to be positive for safety and access objectives. The impact on greenhouse gas objectives is likely to be neutral. Overall the other effects are uncertain without more specific scheme details.
Bus and rail	Extract from RTP SEA –

interchanges – Fishguard (bus focal point)	There is little available detail on each of these schemes however, it is envisaged that the options would involve minor improvements and infrastructure developments. For example, the provision of bus shelters, clearer timetable information and security measures such as lighting. No changes have been made to the assessment. No new significant effects have been identified.
Bus and rail interchanges – Goodwick Railway Station (bus / rail interchange)	Extract from RTP SEA – At Pembroke Dock and Goodwick Station there would be the provision of new interchange facilities for rail, bus, and taxi users. No further details are available at this stage. Goodwick Station is within the Conservation Area – therefore it should be retained.
Bus and rail interchanges – Milford Haven (bus / rail interchange)	Extract from the RTP SEA – The Milford Haven interchange proposal would involve the re-installation of track adjacent to cliff, the building of a new station including office, and re-configuring the car park. The only positive effect is linked to the objective for improved access, while there are neutral impacts on five SA Objectives. There are some uncertainties, due to the potential extent of the modal shift. A negative adverse effect associated with this proposal for biodiversity has been identified as a result of potential effects on the Pembrokeshire Marine SAC. No new significant effects have been identified.
Bus and rail interchanges – Pembroke Dock (bus / rail interchange)	At Pembroke Dock and Goodwick Station there would be the provision of new interchange facilities for rail, bus, and taxi users. No further details are available at this stage. Pembroke Dock Station is a listed building therefore should be retained and included in any re-development.
Rail network improvements – Clunderwen railway station improvement	Extract from the RTP SEA – The options involve the upgrading of existing facilities and aesthetic improvements to railway stations. No changes have been made to the assessment. No new significant effects have been identified.
Park and ride schemes – Tenby (implications for non National Park locations)	Extract from RTP SEA – Existing Park & Ride has been successful within the SWWITCH region and the development of further sites will complement this with the aim to reduce congestion further. Positive effects of the proposal have been identified on four SA objectives, with access to services being significantly positive. There are some neutral impacts, with the assumption that the demand for park and ride services is present. There is a negative effect associated with this proposal for water resources, which could increase pressure on the system.
County Council programmed highway scheme – B4318 Gumfreston to Tenby diversion and improvement phase 3	Drainage and potential impacts on protected species may be the main issues in relation to this allocation. Sustainable drainage systems and ecological assessments would be required.
County Council	Drainage is the main issues in relation to this allocation.

programmed highway scheme – B4320 Monkton re-alignment	Sustainable drainage systems would be required.
County Council programmed highway scheme – A40 High Street to A487 West Street ('Chimneys' link), Fishguard (funding not yet identified, but potential that could be implemented during the plan period)	Drainage is the main issue. Designs should also ensure that no adverse effects on the historic environment.
Waste allocations	
Name/Ref	Summary
Adjoining the Milford Haven (Murco) Refinery WST/LDP/086/01	The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) would be carried out.
Land at Kingsmoor Common, Kilgetty WST/LDP/050/01	The site would provide access to recycling and waste management facilities. Access to civic amenity sites is difficult for many residents in Pembrokeshire. In terms of accessing the site, there may be issues with access from the Kilgetty roundabout. The site would be in a prominent location for motorists viewing the site from the A477 and A 478 – effective screening would be needed.
Winsel near Merlin's Bridge WST/LDP/040/01	The site would provide enhanced capacity for recycling and waste management. Traffic would increase. Screening would be required.
Withybush East of Business Park (undeveloped residual) EMP/040/00004 and 040/00009	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken. The site is near a residential area and therefore would not be appropriate for some waste facilities. The development site is in a location well related to other employment sites in the area, and where access is available. Surface water is an issue in this area and would need to be addressed. The site will bring employment benefits to the area.
Withybush North of Business Park EMP/040/00005	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to

	ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken. The site is near a residential area and therefore would not be appropriate for some waste facilities. The development site is in a location well related to other employment sites in the area, and where access is available. Surface water is an issue in this area and would need to be addressed. The site will bring employment benefits to the area.
Merlins Bridge Creamery and extension site EMP/040/00003	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken. The site is near a residential area and therefore would not be appropriate for some waste facilities. The development site is in a location well related to other employment sites in the area, and where access is available. The site is adjacent to a tributary of the Cleddau Rivers SAC and also abuts the C2 flood zone. The site will bring employment benefits to the area.
Milford Haven Refinery (Murco), Milford Haven EMP/000/00003	It is unknown what facility would be built on the site. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken.
Petro Plus / Dragon LNG EMP/040/00004	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken.
Dale Road, Hubberston EMP/086/00002	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill and remediate past contamination. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken. The site is near a residential area and therefore would not be appropriate for some waste facilities.
Thornton Industrial Estate EMP/086/00003	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to

	ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken. The site is near a residential area and therefore would not be appropriate for some waste facilities.
Waterston Industrial Estate EMP/146/00001	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) may be carried out. A project level Habitats Regulations Appraisal should be undertaken.
Pembroke Power Station site EMP/095/00001	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken.
Kingswood, Pembroke Dock EMP/096/00005	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) may be carried out. A project level Habitats Regulations Appraisal should be undertaken.
Waterloo, Pembroke Dock EMP/096/00006	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) may be carried out. A project level Habitats Regulations Appraisal should be undertaken.
Chevron Refinery, Rhoscrowther EMP/000/00002	It is unknown what facility would be built on the site. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken.
Celtic Link Business Park, Scleddau EMP/034/00006	The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out. A project level Habitats Regulations Appraisal should be undertaken. The site will provide

	employment opportunities and support the local economy.
Trecwn S/EMP/136/00001	Development of the site could provide for re-use of land which has good transport links and would provide employment opportunities. The proximity to the Cleddau Rivers SAC would need appropriate assessment and mitigation at a project level. The nature of the facility is unknown. The site could bring positive benefits and contribute towards reducing the amount of waste to landfill. The proposed use of the site could impact the environment - mitigation and regulation will be in place to ensure that impacts are minimal. An Environmental Impact Assessment (which would include an ecological assessment) should be carried out.

Conclusion of Allocated Sites Assessment

8.9 The allocated sites will contribute to the delivery of the Plan. The sites perform well against the SA Objectives and ensure that development is directed to appropriate locations, while conserving the natural, built and historic environment.

8.10 The allocated employment, retail, mixed use, and marina sites all contribute towards the economic SA Objectives. The social and environmental objectives are also supported by these allocations. Housing sites, community facilities, gypsy traveller sites and open space contribute significantly to the social SA Objectives.

8.11 The waste and transport allocations provide integral support to the economic, environmental and social SA Objectives.

8.12 The allocated waste sites for 'in-building waste management facilities' have been put forward as potential sites as required of the Regional Waste Plan. This requires local planning authorities to look at existing B2 uses classes. It is not likely that all sites will come forward within the Plan. These sites will also be subject to further assessments at project level (e.g. Environmental Impact Assessment, Health Impact Assessment).

Chapter 9: No Plan Scenario

No Plan Scenario

9.1 The no plan or business as usual scenario is also assessed according to the requirements of the SEA Directive. This is to determine the sustainability effects in the absence of the plan and demonstrates the contribution of the new plan to sustainable development.

9.2 The SEA Directive requires identification of *“the relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan or programme”* (Annex 1 (b)).

9.3 Therefore, the key sustainability issues identified for Pembrokeshire from all sources have been analysed to assess the likely scenario if there was no LDP for 2011-2021 (see Table 3). This prediction is difficult as it is dependant upon a wide range of unknown factors. The scenario is based on the likely implications for Pembrokeshire in the absence of a framework to guide the use and development of land. Where other plans, programmes and policies that may also influence these issues, such as national policy, these are given as an example.

Table 3: No plan or business as usual scenario

SA Objective	Business as usual – JUDP until 2016, National Policy thereafter
1. Develop and maintain a balanced population structure	The planning system has limited scope in achieving this objective – all current and future plans and policies encourage developments that are beneficial to all sectors of society. The JUDP strongly encourages inward investment alongside indigenous growth, in the hope that high-wage employment opportunities are created and sustained and a resultant rise in per capita GDP. Strategic Policy 2 aims to address the issue of a top-heavy working population as the county particularly suffers from out-migration of 16-25 year olds.
2. Promote and improve human health and wellbeing through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment	The goal of sustainable development, which includes all the facets of this objective, is driven by the Welsh Assembly Government through national policies and guidance for writing Development Plans. In the absence of a Plan, or under the JUDP, it can be expected that the Planning System will continue to look favourably on schemes that meet this objective, but relies on other sectors for its delivery.
3. Improve education opportunities to enhance the skills and knowledge base	The planning system can facilitate this objective through allocating land, but it cannot directly induce these improvements, whether through an LDP, UDP or national policy.
4. Minimise the need to travel	The Sustainable Communities approach of the

and encourage sustainable modes of transport	JUDP has mixed effects as it aims to reduce the need for the rural population to travel to urban areas, though it leads to high volume of travelling between proximate settlements. The overall spatial emphasis of the JUDP is to concentrate on developing Main Settlements, within and between which there are adequate provision of sustainable transport modes. The Plan allocates employment land throughout the county, encouraging investment and employment opportunities close to the centres of population in urban and rural areas. National guidance aims to deliver sustainable development and so, in a no-plan scenario, guidance such as TAN 6 and MIPPS – Housing would deter irresponsible building in the countryside and other unsustainable locations. TAN 18 – Transport guides the location of development with regards to integration with sustainable travel forms
5. Provide a range of high quality housing including affordable housing to meet local needs	The JUDP claims to address the housing need with site allocations, as detailed in Policy 44, for the Plan period 2001-2016. As responsibility for housing provision is delegated to Local Authorities the post-2016 no-plan scenario would cause great difficulties in ensuring an appropriate housing provision. Policy 50 of the JUDP is a weak bargaining tool for the Local Authority as Affordable Housing can only be negotiated on allocated and 'large' sites, despite a clear need and a growing backlog for affordable housing in urban and rural areas. Without a new plan, the situation will be exacerbated
6. Build safe, vibrant and cohesive communities which have improved access to key services and facilities	The JUDP promotes a Sustainable Communities concept where groupings of settlements can provide a good range of key services locally. Brief analysis in the Rural Facilities report indicates that many communities have suffered from the closure of facilities such as Post Offices and shops. Though the aim of locating development proximate to services is consistent in the JUDP, national guidance and the LDP, the LDP has the benefit of a mechanism - the Settlement hierarchy - to achieve this aim. Policy 76 and the SPG – Building in a Sustainable Way, make the connection that crime can be reduced through good design, such as lighting, appropriate land uses, public open spaces and natural surveillance. Similar guidance exists in National policy, using

	principles from urban design, to encourage better design
7. Protect and enhance the role of the Welsh language and culture	The connection between the land-use planning system and the well-being of the Welsh Language is made in national guidance - Technical Advice Note 20, though in reality the scope of Planning is limited. Policy 126 of the JUDP suggests phasing developments in areas of high Welsh-speaking ability to assist with the integration of new development in the community and recognises the variances in incidence of Welsh speakers across the county. The policy does little to 'enhance' the role of the language. The LDP should strengthen the consideration for the Welsh language as it will include area specific policies.
8. Provide a range of good quality employment opportunities accessible to all sections of the population	The JUDP has allocated land on a mix of large strategic sites, focussing on (brownfield) land adjacent the Milford Haven Waterway, in the Main Settlements and at Trecwn, and a number of local sites, with the aim of encouraging employment opportunities that is widely accessible. The Planning system however does not deliver these opportunities, whether there is an adopted plan or not. The JUDP largely reflects national guidance by favouring brownfield land, urban sites and an element of small scale rural allocations
9. Support a sustainable and diverse local economy	The JUDP largely seeks to boost the economy with an emphasis on inward investment, reflecting the fact that it was written in healthier economic times. The current 'credit crunch' means a more flexible and responsive approach, characterised in the LDP by a drive for complementarity between the key settlements and phasing of housing development, should help better achieve this objective.
10. Prepare for and reduce the impact of Pembrokeshire's contribution to climate change	The objective to reduce the contribution to climate change is not a new aim, and as such the JUDP and national guidance both have various policies that relate to the objective, for example regarding renewable energy generation, pollution minimisation and public transport provision. A draft MIPPS on Climate Change has been prepared to provide a national dimension to, specifically, dealing with and planning for a changing climate. The WAG is also producing a Climate Change Compendium, which the LDP will need to have regard for.
11. Maintain and improve air	Local Authorities, under European and National

quality	directives, are responsible for producing an Air Quality Management Plan. Planning Policy Wales states that Air Quality Management Areas are a material consideration in the Planning system, but as their designations come from outside the Planning system, this objective would be treated and considered the same under any type of plan.
12. Minimise the generation of waste and pollution	Waste and pollution are topics with a great deal of directives and guidance at National level and above. The JUDP is led by the National Waste Strategy for Wales and is linked to TAN 21, resulting in a range of local policies – 116, 129-131. Like many of the more environmentally-focused objectives, this objective is prioritised equally under any type of plan and / or under national guidance
13. Encourage the efficient production, use, re-use and recycling of resources	Resources in this context include a wide range – including minerals, waste, compost, water, energy, land and so on. Many of these components are the specific subject of other SA objectives where greater detail is provided. The JUDP has a sequential approach to development (Policy 1) whereby developing brownfield land is preferable to greenfield. The Plan does not intend to allocate further land for waste disposal (Policy 6) as more sustainable means are pursued. Like many of the more environmentally-focused objectives, this objective is prioritised equally under any type of plan and / or under national guidance
14. Maintain and protect the quality of inland and coastal water	JUDP policy 110 currently contains the guidance on all water issues at a local level. This is supplemented at National and European level by the Water Framework Directive and the Water Resources Management Plan. Like many of the more environmentally-focused objectives, this objective is prioritised equally under any type of plan and / or under national guidance
15. Reduce the impacts of flooding and sea level rises	TAN 15 provides relevant and influential guidance over and above JUDP policy 113. These policies clearly deter development that may lead to flooding or weaken our defences against flooding. Local Authorities also receive clear guidance from the Environment Agency in relation to Development Plans and individual applications, so overall, this objective would be pursued under a no plan, a business as usual and an LDP scenario
16. Use land efficiently and minimise contamination	The Environmental Liability Directive at national level is based on a 'polluter pays' principle, and places a disincentive on development that causes contamination,

	pollution, damage to water resources, habitats and species. This directive is enforced at national level by bodies such as the Environment Agency, CCW etc. Like many of the more environmentally-focused objectives, this objective is prioritised equally under any type of plan and / or under national guidance
17. Safeguard soil quality and quantity	This objective is not currently covered directly by a policy in the JUDP, but is one aspect of policies on landscape protection and contaminated land. There is currently a lack of information on this issue and with national guidance mainly comprising a consultation version of Welsh Soils Action Plan, the LDP is an opportunity to strengthen the Authority's approach to safeguarding soil
18. Protect, enhance and value biodiversity	JUDP policy 65 sits alongside Planning Policy Wales and the Pembrokeshire Local Biodiversity Action Plan in aiming to protect biodiversity from adverse impacts of development. Like many of the more environmentally-focused objectives, this objective is prioritised equally under any type of plan and / or under national guidance
19. Protect and enhance the landscape and geological heritage	Planning Policy Wales guides Planning Authorities towards utilising LANDMAP in assessing the landscape impacts of development proposals. JUDP policy 66 specifies some of the features of particular importance to the Pembrokeshire landscape such as hedgerows and hedgebanks. However the policy implies SPG on Landscape will be produced, which is no longer the case. The LDP therefore offers an opportunity to strengthen the Authority's commitment to this objective
20. Encourage quality locally distinct design that complements the built heritage	The JUDP (policies 7 & 76) and the associated SPG on Principles of Good Design in Residential Development both strongly feature the ambition of design within the traditions of a Pembrokeshire vernacular. The MIPPS on Good Design provides a national context that ensures design remains an important issue in a no plan scenario. The LDP has the benefit of providing guidance that incorporates the new MIPPS and develops the concept of locally distinct and appropriate design
21. Protect, enhance and value the built heritage and historic environment	The Planning system is equipped with mechanisms such as Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and various other designations that ensure the impact on built heritage and historic environment are considered in all development proposals, whether under the

	JUDP, LDP or purely through national guidance. Area specific policies strengthen the system's ability to exercise discretion and these are currently provided in JUDP policies 79 - 86
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Chapter 10: In-combination and Cumulative Effects

In-combination and Cumulative Effects

10.1 Other plans are also likely to influence the effects of the Local Development Plan. Most notable of these are the Wales Spatial Plan (First Review, 2008), and the Development Plans for the Pembrokeshire Coast National Park Authority¹¹ (PCNPA), Ceredigion County Council¹² and Carmarthenshire County Council¹³. The Pembrokeshire County Council LDP and SA has taken account of these other plans and their respective Sustainability Appraisals. The SA of the Wales Spatial Plan identified mitigation measures to ensure that any negative effects of the spatial strategy are minimised or avoided and these are incorporated into the Plans. Other plans, programmes and policies were also reviewed for the SA Scoping Report Appendices and these documents have been updated to include any new plans which have been developed (Appendix 8 of this report).

10.2 The potential impacts and combination effects of neighbouring Authorities' Plans has been addressed by considering Pembrokeshire County Council allocations in the context of neighbouring Authorities' allocations. The PCNPA LDP has been adopted, Ceredigion will be consulting on their Deposit Plan early in 2011, and Carmarthenshire are likely to consult on their Deposit Plan during May-July 2011.

10.3 There are complementary roles between the different authorities for example the Pembrokeshire County Council area is a key area for housing and employment opportunities and the National Park providing recreation. In areas such as St Dogmaels and Clunderwen, Crymych, Lampeter Velfrey, and many other areas where there are complementary roles provided by Pembrokeshire County Council, Pembrokeshire Coast National Park, Ceredigion and Carmarthenshire. This was taken into account when drafting the plans policies. The cumulative nature of the predicted effects has been explored where possible and details provided in the commentary of allocated site assessments (Appendix 5).

10.4 Effects are also related to the sustainability baseline in a particular area through assessing every option on its own merit and relating it to the baseline and issues or opportunities available. There are a variety of potential cumulative effects (Table 4), such as habitat loss and fragmentation from different developments which could cumulatively have a greater effect than these developments alone. The table below identifies potential cumulative effects and how the LDP will mitigate against these potential effects.

¹¹ PCNPA LDP <http://www.pembrokeshirecoast.org.uk/default.asp?PID=178>

¹² Ceredigion LDP Cabinet Papers <http://www.ceredigion.gov.uk/index.cfm?articleid=15739>

¹³ Carmarthenshire Preferred Strategy

<http://www.carmarthenshire.gov.uk/english/environment/planning/planning%20policy%20and%20development%20plans/local%20development%20plan/pages/preferredstrategy.aspx>

Table 4: Potential cumulative effects

Potential Cumulative Effect	Affected Receptor	Causes	Mitigation
Habitat loss and fragmentation	- SSSI, SPA, SAC - BAP – Areas of local conservation significance - non-designated sites important for ecological connectivity	Use of land for new infrastructure, dwellings and employment uses.	GN 36 Protection and Enhancement of Biodiversity offers a robust policy which will ensure that there are no adverse effects upon biodiversity from development as a result of the LDP. GN 1 General Development Policy is also relevant for this cumulative effect.
Climate change	- worldwide	Increase in CO ₂ emissions through increased motorised transport usage and increased emissions from residential and commercial developments.	Residential development in the Plan is based on a settlement hierarchy which directs new housing to areas where there is access to services and facilities which would contribute to reducing the need to travel and hence reduce CO ₂ emissions.
Increase in ambient noise levels	- people living adjacent to major roads - species	Increase in traffic flows, increased congestion, new transport infrastructure.	GN1 will ensure that development does not result in a detrimental impact from noise.
Increase in air pollution	- people living and working in identified and possibly extended Air Quality Management Areas - Habitats and species described above	Increase in traffic flows, increased congestion, new transport infrastructure.	There are no AQMAs within Pembrokeshire. Air quality is also addressed within the reasoned justification for GN 1.
Fragmentation/loss of public open space	- Residents and visitors - Existing public open space - Habitats and species as described above	Use of land for new infrastructure, dwellings and employment uses.	Development is directed towards settlements. Public and open space is protected and designated under policies GN 3 Infrastructure and New Development – where developers would need to provide open space as part of the development; GN 34 Protection and Creation of Outdoor Recreation Areas; and GN 35 Protection of Open Spaces with Amenity Value will ensure that the potential effects are mitigated. GN 36 also supports this.

Degradation of water quality	- Residents - Habitats and species as above	Use of land for new infrastructure and increased runoff from impermeable surfaces contaminating waterways.	GN 1 ensures that development will not be permitted where it would have a significant adverse impact on water quality and that necessary and appropriate service infrastructure is provided. Sustainable drainage systems will be required (GN 2 Sustainable Design, GN 3 Infrastructure and New Development).
Loss of local townscape character	- Listed buildings - Conservation areas	Unsympathetic design of new development negatively affecting the setting of listed buildings. Disturbance to character of areas through increased traffic flows.	GN 1, GN 2 and GN 37 Protection and Enhancement of the Historic Environment will ensure that townscape and the historic environment are protected and enhanced.
Increase in flood risk	- Residents - Habitats and species as above - Coastal habitats	Use of land for new infrastructure, dwellings and employment uses and associated increased runoff from impermeable surfaces.	GN 1, TAN 15 and national policy will ensure that development will not be permitted where it would have a significant adverse impact on flooding. GN 1 ensures that necessary and appropriate service infrastructure is provided. Sustainable drainage systems will be required (GN 2 Sustainable Design, GN 3 Infrastructure and New Development). Developers may need to contribute towards flood alleviation schemes (GN 3).
Improvement in overall levels of health	- Residents	Increase in walking and cycling from infrastructure improvements. Improvements in levels of air quality.	Policies in the LDP will ensure positive health impacts. GN 34 and GN 35 provide space which can contribute to well being. All developments are subject to policies which ensure health and safety issues are minimised.
Increase in accessibility to essential services	- Residents	Improved provision of public transport, walking and cycling, and car linkages to essential services. Direct provision of new community facilities.	The LDP contributes positively to the accessibility of essential services. New community facilities will be provided (GN 33).
Reducing road traffic and	- Residents and visitors	Various measures and proposals	GN 1 ensures that sustainable transport

congestion	- Habitats and species as above	aimed at reducing road traffic and congestion and encouraging alternatives to the car.	and accessibility principles are built in to development. Positive impacts for residents and visitors, as well as habitats and species.
Attracting inwards investment and increasing economic diversity	- Residents	Various proposals aimed at improving the image of the area to residents and businesses, which may attract additional private sectors investment in the area.	The LDP is committed to supporting a sustainable economy which will provide benefits for the County as a whole.

Consideration of Neighbouring Authorities Plans

10.5 Pembrokeshire Coast National Park Authority adopted LDP has an allocation within Crymych. Part of Crymych is also in the PCC Plan area. There is a Park allocation for 15 units at the Depot Site in Crymych. This level of housing is unlikely to impact adversely with PCC allocations. More allocations are in Tenby which is within the PCNPA area. However, policies within the PCNPA LDP will ensure that potential cumulative impacts with surrounding areas (Penally, St Florence, East Williamston, Kilgetty, Begelly and Amroth) are minimal. Policies within the PCC LDP will ensure any cumulative effects are mitigated.

10.6 The Ceredigion LDP Deposit allocates land in settlements adjoining the Plan area. Ceredigion allocations in Cardigan for 146 units are unlikely to impact adversely upon the PCC LDP allocations at St Dogmaels. The Ceredigion Deposit Plan identifies linked settlements at Cilgerran, Eglywswrw and Abercych. Due to the nature and scale of development there are unlikely to be cumulative impacts on the PCC LDP.

10.7 The Carmarthenshire LDP is at Preferred Strategy stage and therefore no specific allocations have been made. Community Council areas which adjoin Carmarthenshire are Amroth, Clunderwen, Clydau, Crymych, Lampeter Velfrey, Llanddewi Velfrey, Manordeifi and Mynachlog-ddu.

10.8 Due to the scale and location of development in the PCNPA and Ceredigion (and Carmarthenshire), there are unlikely to be significant cumulative impacts with the PCC LDP. Information sharing and discussion on cross border issues via the South West Wales Regional Policy Officers and Pathfinder meetings, and a group set up specifically to discuss SA/SEA and HRA which includes officers from Carmarthenshire County Council, Pembrokeshire Coast National Park and Ceredigion County Council has ensured discussions have been ongoing throughout the process. The complementarity of settlements within the four plan areas is vital.

Cumulative Effects Assessment of the LDP

10.9 The cumulative effects of the strategic and general policies of the Plan has been explored using a table which compares the positive and uncertain effects across policies, in relation to the SA of the policies, compared with SA Objectives. Those policies where there is no relationship have also been highlighted. Policies with the LDP have been developed to ensure no adverse cumulative impacts within the Plan. By reading across the table, the potential overall cumulative effects of the policies on contributing to the SA Objective can be summarised. The strategic policies and general policies with similar topic areas have been grouped together, for example housing, employment and retail.

10.10 The cumulative assessments shown in Tables 5 and 6 use the key:

- ✓ The strategic policy may have a potential positive effect on the SA

Objective

- ? It is uncertain what effect the policy will have on the SA Objective, a more detailed assessment will be required.
- 0 The policy has no direct relationship with the SA Objective.

10.11 With reference to the strategic and general policies, the overall outcome of this assessment is that in most instances it is expected that Local Development Plan policies will cumulatively have a positive impact on meeting all Sustainability Appraisal Objectives. It is forecast that objectives relating to human health, the economy, employment and efficient land-use will be achieved through a majority of the policies. Objectives with fewer contributory policies, but positive effects nonetheless, include a balanced population, education and flooding.

10.12 Where there is uncertainty expressed regarding the probable effect of a policy on achieving SA objectives, it is the result of assessing the potential direct impact of an individual policy(ies). In reality, all policies will be expected to create positive impacts when used in conjunction with protective policies such as GN 1 General Development Policy and GN 2 Sustainable Design.

10.13 Cumulatively, the allocated sites will contribute significantly to the sustainable economic growth of the area, through the provision of strategic and local employment sites. The range of housing sites will provide accommodation for a range of housing needs, including local needs and market housing in urban and rural settlements, allowing people to choose to live near their home community with access to facilities and services. Environmentally, the allocated sites will ensure that the quality of the environment is protected and enhanced, this is particularly emphasised in conjunction with the robust policies which will guide development.

Conclusions of In-combination and Cumulative Effects Assessment

10.14 The in-combination effect of the plan has identified that detailed policies and specific land allocations is unlikely to be negative. When the policies and allocations are compared with neighbouring authorities LDPs and other plans no significant effects are recorded.

10.15 There are considerable positive effects on the social and economic objectives in terms of education, housing, employment and economy. Environmental objectives also do well overall with potentially significant positive outcomes.

Table 5: Cumulative effect assessment of Strategic Policies

SA Objectives	Strategic Policies												Potential Cumulative Effects
	1	2	3	4	5	6 & 11	7, 8, 12, 13	9	10	14	15	16	
1 – Population	✓	✓	✓	0	0	0	✓	✓	0	✓	✓	✓	Largely positive impacts
2 – Human Health	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	Overall potential positive effect on human health
3 – Education	✓	0	0	0	✓	0	0	✓	0	✓	✓	✓	Positive cumulative effects and no relationship with employment policies
4 – Transport	✓	0	✓	✓	✓	✓	✓	0	✓	✓	✓	?	Largely positive impacts, uncertainty with transport in the countryside.
5 – Housing	✓	0	0	0	0	0	✓	✓	✓	✓	✓	✓	Overall positive effects on housing including affordable housing.
6 – Communities	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	✓	Positive social effects with some uncertainty
7 – Welsh	✓	0	0	0	0	0	0	✓	0	✓	✓	✓	Largely no effect, some positive effects
8 – Employment	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	Significant positive effects on employment
9 – Economy	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	Significant positive effects on the economy
10 – Climate change	✓	✓	✓	✓	0	✓	✓	0	✓	✓	✓	✓	Positive effects on climate change
11 – Air quality	✓	✓	✓	0	0	✓	0	0	✓	✓	✓	✓	Positive cumulative effect on air quality
12 – Waste & pollution	✓	✓	✓	0	✓	✓	✓	0	✓	✓	✓	✓	Significant potential positive effects
13 – Resources	✓	✓	✓	0	✓	✓	✓	0	0	✓	✓	✓	Positive effects cumulatively for resources
14 – Water Quality	✓	✓	✓	0	0	✓	✓	0	0	✓	✓	✓	Largely positive impacts
15 – Flooding & Sea Level	✓	✓	✓	0	0	✓	✓	0	0	✓	✓	✓	Cumulative impacts are positive
16 – Land use & Contamination	✓	✓	✓	0	0	✓	✓	0	✓	✓	✓	✓	Largely positive impacts on land use and contamination.
17 – Soil	✓	✓	✓	0	0	?	0	0	✓	✓	✓	✓	Overall potential positive effect on soils
18 – Biodiversity	✓	✓	✓	0	✓	✓	✓	0	✓	✓	✓	✓	Positive effects on biodiversity
19 – Landscape	✓	✓	✓	0	✓	✓	✓	0	✓	✓	✓	✓	Significant positive effects on landscape
20 – Design	✓	✓	✓	0	✓	0	✓	0	✓	✓	✓	✓	Largely positive impacts on design
21 – Built Heritage & Historic Env	✓	✓	✓	0	✓	0	✓	0	✓	✓	✓	✓	Overall potential positive effect on soils

Table 6: Cumulative effect assessment of General Policies

	General Policies																	Potential Cumulative Effects
SA Objectives	1, 2, 3	4	5, 6, 7, 8, 9	10, 11	12, 13, 14, 15	16, 17, 18, 19, 20, 21	22	23, 24, 25	26	27, 28, 29, 30, 31	32	33	34, 35	36	37	38	39, 40, 41	
1 – Population	0	0	✓	0	✓	?	?	0	0	✓	✓	✓	0	0	0	0	0	Many positive impacts, but with some uncertainty relating to tourism based developments
2 – Human Health	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	0	✓	✓	✓	0	✓	✓	Overall potential positive effect on human health
3 – Education	✓	0	✓	✓	0	0	0	0	0	0	0	✓	✓	?	?	✓	0	Some positive effects, but not many policies directly affect this objective
4 – Transport	✓	✓	✓	?	✓	✓	?	0	0	✓	✓	✓	✓	0	?	✓	?	Some uncertainty which requires further investigation and will depend on the nature of individual proposals
5 – Housing	✓	✓	✓	✓	0	?	✓	0	0	✓	✓	0	0	0	0	✓	0	Mainly a mix of positive and no effects. Uncertainty regarding the impact of tourism
6 – Communities	✓	0	✓	✓	✓	✓	?	0	0	✓	✓	✓	✓	0	✓	✓	✓	Positive social effects anticipated from many types of development
7 – Welsh	✓	0	0	✓	0	?	0	0	0	✓	✓	✓	0	0	0	0	0	Largely no effect, some positive effects. Will depend on Individual proposals
8 – Employment	✓	✓	✓	✓	✓	✓	✓	0	0	✓	0	✓	0	0	0	✓	✓	Significant positive effects on employment
9 – Economy	✓	✓	✓	✓	✓	✓	✓	0	0	✓	✓	✓	✓	✓	✓	✓	✓	Significant positive effects on the economy
10 – Climate change	✓	✓	✓	0	0	✓	?	✓	0	✓	✓	0	✓	✓	0	?	✓	Some positive effects on climate change.
11 – Air quality	✓	✓	?	?	0	?	0	0	0	0	✓	0	✓	✓	0	?	✓	Some positive effects but

																		cumulative impact will depend on protective policies mitigating the impacts of development.
12 – Waste & pollution	✓	✓	?	0	?	0	?	✓	0	?	✓	0	✓	✓	0	?	✓	Some positive effects but cumulative impact will depend on protective policies mitigating the impacts of development.
13 – Resources	✓	✓	✓	✓	0	0	0	✓	✓	✓	✓	✓	0	0	0	?	✓	Mostly positive effects
14 – Water Quality	✓	?	?	?	0	0	✓	0	0	0	✓	0	✓	✓	0	0	✓	A few positive and uncertain effects dependent on the nature of development
15 – Flooding & Sea Level	✓	✓	✓	0	0	0	✓	0	0	0	✓	0	✓	✓	0	0	0	Many positive effects
16 – Land use & Contamination	✓	✓	✓	✓	✓	0	✓	✓	0	✓	✓	0	✓	✓	✓	✓	✓	Many positive effects
17 – Soil	✓	0	?	?	0	0	✓	0	0	0	0	0	✓	✓	0	0	0	A few positive and uncertain effects
18 – Biodiversity	✓	?	?	✓	0	?	?	0	0	?	✓	0	✓	✓	✓	?	✓	Some positive effects but cumulative impact will depend on protective policies mitigating the impacts of development.
19 – Landscape	✓	?	?	✓	0	?	✓	0	0	✓	✓	0	✓	✓	✓	?	?	Some positive effects but cumulative impact will depend on protective policies mitigating the impacts of development.
20 – Design	✓	0	✓	✓	✓	✓	✓	0	0	✓	0	✓	✓	✓	✓	0	0	Mostly positive effects
21 – Built Heritage & Historic Env	✓	✓	✓	✓	✓	✓	✓	0	0	✓	0	✓	✓	✓	✓	?	0	Mostly positive effects

Chapter 11: Habitats Regulations Appraisal

Habitats Regulations Appraisal

11.1 Habitats Regulations Appraisal (HRA) of the likely significant effects of the LDP on Natura 2000 sites is also required under Article 6(3) of the Habitats Directive (92/43/EEC) and under the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations). There are a number of Natura 2000 sites designated for their habitats and species which will need to be considered.

11.2 HRA has been carried out throughout the production of the plan, and reported separately but parallel to this SA process. An initial screening of the LDP has already taken place which could not conclude whether or not the plan would have a likely significant effect on Natura 2000 sites (see www.pembrokeshire.gov.uk/planning).

11.3 The Preferred Strategy was then developed and was screened against the conservation objectives for the Natura 2000 sites and consulted on with the statutory consultee. From the Preferred Strategy, the LDP Deposit was developed and has been through the same HRA process. Changes were made to the policies within the LDP and these serve to ensure no likely significant effects on European sites. The results of the HRA have been taken into account during the production of the LDP and this Sustainability Appraisal.

Chapter 12: Developing the Plan

How the SA has developed the Plan

12.1 The SEA Directive requires consideration of how any significant impacts which were identified in the SA process could be mitigated. Mitigation could be achieved through:

- Re-organisation and re-wording of policies;
- Requirements for developers to show how they have addressed environmental and sustainability concerns, for example through travel plans, ecological assessments, flood assessments, HRA, Code for Sustainable Homes;
- Production of Supplementary Planning Guidance and development briefs;
- Through developer contributions.

12.2 The Plan has changed and developed throughout the process to ensure that it contributes positively towards sustainable development. Appendix 6 documents the changes that have been made to the policies throughout the process in response to the appraisal of the plan. This has ensured that future development within Pembrokeshire will respect and conserve the natural, built and historic environment while providing for the social and economic well being of both residents and visitors. Policies were reworded to improve the clarity of the Plan, this included removing and consolidating policies to avoid repetition.

12.3 The main changes and improvements to the Plan were:

- Strengthening of biodiversity policies (GN 36) to ensure that the potential effects on European sites are removed and that biodiversity is protected and enhanced.
- The Plan now references specific resource efficiency to ensure that development does not impact on water resources and energy and minimises demand on resources.
- The cumulative effects of development on infrastructure have been reduced through the encouragement of sustainable drainage systems, water conservation measures, and to ensure that development takes account of sewerage issues. This will ensure no undue pressure on infrastructure.
- A Development Sites SPG has been developed which provides even greater protection of biodiversity and mitigation of infrastructure issues at the specific allocated sites.

12.4 The Plan addresses the sustainability issues which were identified within the SA Scoping Report¹⁴ and Chapter 3 of the LDP and meets the social, economic and environmental SA Objectives through greater environmental

¹⁴ SA Scoping Report Post-Consultation January 2009, Section 2

protection, creating sustainable communities and supporting the rural and urban economy.

Chapter 13: Summary and Next Steps

Summary and Next Steps

13.1 This SA incorporating Strategic Environmental Assessment was used to determine the overall sustainability of the LDP Deposit strategic policies, general policies and land allocations. The Plan and SA Report will be consulted extensively with the statutory consultees, stakeholders and the public.

13.2 Overall the SA process has influenced the LDP resulting in a more sustainable plan, ensuring environmental, as well as social and economic factors have been integral to decision making throughout the LDP preparation process. The SA has, therefore, met its requirements, and the LDP has been produced in accordance with this SA.

13.3 The Plan and accompanying SA (incorporating SEA) will be subject to consultation. The next steps following consultation are to consider the formal representations received and consider proposals made for alternative sites, provide an opportunity for anyone to put forward representations on the alternative sites proposed. Identify any changes to the Plan that PCC would support to the Inspector, Advertise any focussed changes, and then submit the Plan to the Welsh Assembly Government. The Plan will then be subject to Examination by an Independent Inspector to test the soundness of the Plan.

Monitoring

13.4 Monitoring of the SA of the LDP will take place following adoption; a monitoring framework has been developed in the Plan. Indicators were suggested for the monitoring stage in the SA Scoping Report based on measuring the SA Objectives and as part of the SA of the Preferred Strategy. Those indicators in the SA Scoping Report were potential indicators which have been selected from the guidance (Table 7). The proposed monitoring of the LDP is highlighted in Chapter 7 of the Plan.

Table 7: Potential indicators for monitoring the SA

SA Objectives	Potential SA indicators: ways of quantifying the baseline, prediction and monitoring
1. Develop and maintain a balanced population structure	• % of population aged 65+
2. Promote human health and wellbeing through a healthy lifestyle and access to healthcare and recreation opportunities and a clean and healthy environment	• Access to key services (being developed for the Community Plan) • Total number of people Killed or Seriously Injured (KSI) per year • Long term sickness • Accessibility of semi-natural greenspace

3. Improve education opportunities to enhance the skills and knowledge base	• Proportion of 16 year olds without 5+ GCSEs (%) • % of adults in adult education
4. Minimise the need to travel and encourage sustainable modes of transport	• Mode of travel to work, % travel to work by car • Journeys made by public transport • Public transport accessibility • Link to monitoring measures of the Regional Transport Plan
5. Provide a range of high quality housing including affordable housing to meet local needs. 6. Build safe, vibrant and cohesive communities which have improved access to key services and facilities. 7. Protect and enhance the role of the Welsh language and culture	• Housing land supply. • Amount of affordable housing provided • Access to key services (being developed for the Community Plan) • Offences per 1000 of population • % of people who are Welsh speakers • Number of communities where planning applications approved with a condition requiring phasing to take account of impact on the Welsh language.
8. Provide a range of good quality employment opportunities accessible to all sections of the population. 9. Support a sustainable and diverse local economy	• Claimant count amongst working age population (%) • % of economic activity by sector • Number or % of vacant floorspace within primary and secondary frontages of the Town Centres • Planning permissions for tourism developments, employment developments per year.
10. Prepare for and reduce the impact of Pembrokeshire's contribution to climate change	• CO2 emissions non domestic public stock • Energy efficiency of the economy
11. Maintain and improve air quality	• Days when air pollution is moderate or higher at Narberth AURN • Achievement of emission limit values
12. Minimise the generation of waste and pollution 13. Encourage the efficient production, use, re-use and recycling of resources	• Total and percentage of municipal waste and municipal waste recycled, composted, used to recover heat, power and other energy sources, and land filled • Electricity produced from renewable sources • Access to recycling facilities
14. Maintain and protect the quality of inland and coastal	• % of total classified rivers complying with water quality objective

water	• % new developments with SUDS • Per capita consumption of water
15. Reduce the impacts of flooding and sea level rises	• Amount of development permitted in C1 and C2 floodplain.
16. Use land efficiently and minimise contamination.	• Area of contaminated land and contaminated land remediated
17. Safeguard soil quality and quantity	• Area of development of brownfield/contaminated land/previously developed land
18. Protect and enhance biodiversity	• % of designated sites in unfavourable condition • Number of biodiversity sites affected by development
19. Protect and enhance the landscape and geological heritage	• Number of sites designated for cultural heritage including archaeology affected by plan proposals
20. Encourage quality locally distinct design that complements the built heritage	• Number of listed buildings affected by plan proposals • Number / % of buildings on buildings at risk register • Measured area of land within the Historic Landscapes affected by new development
21. Protect and enhance the built heritage and historic environment	• Number of historic parks and gardens affected by development/plan proposals • Number of SAMs adversely affected by development plan proposals

Commenting on the SA Report and LDP

13.5 This report will be subject to public consultation from 26 January 2011 to 5.00 p.m. on 9 March 2011. Please comment on this SA Report using the response form in Appendix 10 of this report.