

Local Development Plan Sustainability Appraisal (Strategic Environmental Assessment) Report

Consultation Responses and Council Position

November 2011

The SA Report was open for statutory consultation and a wider consultation from 26 January 2011 to 9 March 2011. The statutory consultees are Environment Agency Wales, Countryside Council for Wales and Cadw. The document was available for a wider consultation.

A total of 8 representors commented. For a summary of consultation comments and officer responses to them see Table 1 below. Responses are presented in the format that they were received and have not been edited.

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

1. Assessment of the vision
2. Assessment of the LDP Objectives
3. Assessment of the LDP Strategic Policies
4. Assessment of the LDP General Policies
5. Assessment of the allocated sites
6. In combination and cumulative effects
7. Monitoring of the sustainability appraisal
8. Other comments.

Table 1: Consultation responses to the SA Scoping Report

Representation Number (rep id/rep no)	Representor Surname / Organisation	Representation Full Text	Advisory Response Type	Council Position
	e	<u>Q1 Vision</u> I agree with the overall vision based on a development strategy that includes both strategic and general policies with specific land allocations to guide development during the LDP plan period 2011 to 2022.	No change proposed.	Support welcomed. No amendment necessary.
		However baseline data for the sustainability appraisal appears to be flawed at certain specific Housing Allocation Sites (HAS) due, possibly, to a breakdown in internal communication during stage 4 of your site assessment process.	No change proposed.	Noted. Reference to a specific housing allocation is made later in Mr Jones' representation.
		<u>Q2 LDP Objectives</u> One of the LDP objectives is to provide necessary infrastructure for development to take place. There is evidence to suggest that investment in off-site service infrastructure, to serve certain specific HAS, has not been programmed by the appropriate authority during the plan period 2011 to 2022. This would result in unsustainable development.	No change proposed.	Site allocations have taken into account comments by Dwr Cymru Welsh Water and the Environment Agency. Focussed change is proposed to LDP policy GN 3 to clarify the requirements for infrastructure funding contributions.
		<u>Q3 Strategic Policies</u> I refer to Strategic Policy 1. I take the view that sustainable development will only be achieved when investment in off-site service infrastructure precedes development. There is no evidence, locally, that investment in off-site drainage infrastructure is programmed for the LDP plan period 2011 to 2022. Please refer to my response to question 5 below.	No change proposed.	General Policy GN 3 Infrastructure and New Development addresses this issue.
		<u>Q4 General Policies</u> General policy 3 states that new development places additional demands on infrastructure and services therefore developers are expected to make a contribution towards social, cultural and physical infrastructure. I agree with the overall policy statement. However, hydraulic modelling and structural surveys of off-site drainage networks will be required to establish hydraulic capacity and structural integrity of the drainage networks. It is important that developers are not misled, with regard to off-site service infrastructure upgrade requirements, when purchasing Housing Allocation Sites. Significant study / survey costs may be required before a developer is in a position to establish the economic viability of developing a HAS.	Policy GN 3 subject to focussed change.	Focussed change is proposed to LDP policy GN 3 to clarify the requirements for infrastructure funding contributions.
		Additionally, new development proposals will be expected to	No change proposed.	The SA Report is sufficiently clear without this

		incorporate sustainable drainage systems to adoption standard. Easements will need to be negotiated with off-site landowners where Sustainable Urban Drainage Systems (SUDS) are routed through private land not under the developer's ownership or control. I consider that policy needs to be strengthened with regard to SUDS as drainage authorities are currently reluctant to adopt off-site SUDS if there are issues regarding land in multiple ownership and it is not clear who should maintain, and replace, the drainage system in perpetuity.		amendment.
		Developers do not have statutory powers to undertake works off-site on land not under their ownership or control. For example, flood alleviation schemes. The work would need to be undertaken by the relevant drainage authority (although possibly funded by the developer should the drainage authority decide not to use their permissive powers to undertake the off-site work from public funds) and the work identified in revenue or capital programmes during the LDP plan period 2011 to 2022. Failure to do so would result in unsustainable development.	No change proposed.	The SA Report is sufficiently clear without this amendment.
		<u>Q5 Allocated sites</u> Table 2 on page 55 provides a summary of site allocation assessments. With specific reference to HSG / 020 / 00062 at Cilgerran. There is an acknowledgement that there are known issues with sewerage and that development should be phased to link in with DCWW improvement programmes. However, there is a failure to acknowledge the considerable previous correspondence with PCC on drainage, flooding and legal issues in the western drainage catchment at Cilgerran. This suggests a breakdown in communication between your forward planning team and drainage department at stage 4 of your site assessment process.	No change proposed.	The assessment of sites is at a level of detail required for the LDP. All information submitted for development sites is consistent with that provided for other allocated sites. The Council may identify a need for additional information, including detailed surveys or assessments to support any planning application.
		An abstract from an outline Drainage Impact Assessment (DIA), previously forwarded, relating to HAS / 020 / 00062 is appended hereunder. DIAGRAM Outline Drainage Impact Assessment (DIA) Drainage is a material consideration in development planning and development control. An ordinary watercourse (draining part of site HSG / 020 / 00062, and wider catchment) is culverted through the grounds of Can yr Eos and Llwyn yr Eos, and under the public highway to outfall at Penllyn to the river Plysgog. The diameter of the culvert is 450mm. Highway gullies are also connected to the culvert to drain the public highway. This is therefore a shared network comprising private land drainage and public highway	No change proposed.	The SA Report is sufficiently clear without this amendment.

		drainage. With regard to the private element, riparian rights and obligations under common law apply, together with statutory rights of water abstraction {under S.27 Water Resources Act 1991 (as amended by S.6 Water Act 2003)}. Under the Act there is a right to abstract up to 20m3 of water in a 24-hour period for domestic use. The water abstraction point is located within the grounds of Llwyn yr Eos. The concrete culvert beneath the C3004 County Road at Penllyn is a highway structure maintainable by Pembrokeshire County Council's Highways Asset Management Section. The stone culvert is owned by riparian landowners. The exact route of the culverted watercourse through housing allocation site HSG / 020 / 00062 is not known. Culverts (draining the wider catchment) are located in the disused railway embankment that adjoins, and shares a boundary with, the site. The site (and wider catchment) also drains in an easterly direction to another watercourse conveyed beneath the public highway through a, partially collapsed, stone culvert to discharge to the river Plysgog at Penllyn. A branch culvert is routed through the church grounds, to outfall to Cilgerran gorge at Church Street. An image of the stone culvert is appended below and the partial collapse should be noted. The off-site drainage infrastructure serving this HAS dates back literally to the stone age.		
		As drainage is a material consideration in development planning and development control, a more detailed drainage impact assessment should now be undertaken to provide the following information: • Confirm, on plan, the existing drainage layout • Outline, on plan, the proposed drainage layout • Provide an inventory of drainage assets, in the vicinity of site HSG / 020 / 00062, maintained by PCC Highways Asset Management Section. • Calculate the private and public element of flow in the shared drainage network. • Assess the hydraulic capacity of the existing drainage system. • Assess the structural integrity of the existing drainage system: the stone culverts date back centuries and are partially collapsed. • Assess the legal implications of interfering with the quantity and quality of flow through land in third party ownership as common law riparian rights and statutory rights of water abstraction apply. PHOTO	No change proposed.	The SA Report is sufficiently clear without this amendment.
1757/DP/SA/11	Mr Wynne Jones	The SEA Directive requires identification of "the relevant aspects of the current state of the environment and the likely evolution thereof	No change proposed.	The level of detail in the Sustainability Appraisal Report (incorporating Strategic Environmental

		without the implementation of the plan or programme” With regard to off-site service infrastructure, I consider that the current state of the environment has not been established as a baseline from which to measure future change.		Assessment) is appropriate for the Plan.
		Additionally, in June 2007, your engineering consultants (Atkins) delivered a feasibility study relating to fluvial flooding at Cwm Plysgog downstream of your Housing Allocation Site. They concluded that 16 properties were at risk of fluvial flooding. Their conclusions and recommendations should have been taken into consideration in your sustainability appraisal of site 00062.	No change proposed.	The level of detail in the Sustainability Appraisal Report (incorporating Strategic Environmental Assessment) is appropriate for the Plan.
		<u>Q6 In-combination and Cumulative Effects</u> A statement on page 89 confirms that “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”. I suggest the following re-draft (amendments in red). re-draft “The cumulative effects of development on infrastructure have been reduced through the requirement to provide sustainable drainage systems, water conservation measures, and to ensure that development takes account of sewerage issues. This will ensure no undue pressure on infrastructure. end of re-draft	Minor wording change proposed.	Policy GN 2 states the requirement for sustainable drainage systems (see criterion 3). Text inserted in 12.3 of SA Report: The cumulative effects of development on infrastructure have been reduced through the requirement to provide sustainable drainage systems, water conservation measures, and to ensure that development takes account of sewerage issues. Amended wording improves clarity.
		<u>Q7 Monitoring of the SA</u> I suggest the following potential SA indicators be included to monitor SA objectives SA objective 10 Prepare for and reduce the impact of Pembrokeshire’s contribution to climate change. Additional SA indicator 10 Flood risk identified on WAG Development Advice Maps (DAM). SA objective 18 Protect and enhance biodiversity.	No change proposed.	There is a monitoring outcome for the LDP which includes: no significant additional flood risks arising from development (outcome 2, page 23). Monitoring of development on C1 and C2 zones will be undertaken under SA Objective 15.

		Additional SA indicator 18 The number of “important” hedgerows (as defined in Hedgerow Regulations 1997) protected during the development process. <u>Q8 Other comments</u> With regard to off-site service infrastructure serving Housing Allocation Sites, baseline data, from which to measure future change, needs to be clearly established by means of studies / surveys by the relevant drainage authority to ensure sustainable development.	No change proposed. No change proposed.	The retention of hedgerows is considered under the LDP policies, and during the planning application process. Baseline information provided in the Sustainability Appraisal is at an appropriate level of detail.
		No comments	No change proposed.	Noted.
	Cadw	The Sustainability Appraisal Report is thorough and well written and Cadw has no changes to suggest or comments to make.	No change proposed.	Support welcomed.
	Environment Agency Wales	We are satisfied that the Sustainability Objectives cover our main concerns.	No change proposed.	Support welcomed.
	Environment Agency Wales	Page 23, paragraph 10. ‘New developments that have regard to risk’. This should be amended to read ‘New developments must have regard to risk’.	Minor wording change proposed.	Proposed change improves clarity.
	Environment Agency Wales	Page 23, paragraph 3.14. Water. Should include reference to the Water Framework Directive (WFD)	Minor wording change proposed.	Proposed change improves clarity. Text inserted - Have regard to the Water Framework Directive.
	Environment Agency Wales	Page 36, policy SP2. Port and energy related development. ‘A potential negative impact....’ This is unacceptable due to the location of the marine SAC and the implications of pollution and the WFD.	No change proposed.	The SA Report identifies potential effects of the LDP, both positive and negative. This statement reflects this.
	The Environmental Network for Pembrokeshire (TENP)	<u>Q1 Vision</u> Whilst the Strategic Objectives to deliver the vision and the sub-objectives shown on page 21 of the LDP are commendable and generally supported, TENP is concerned about the balance reflected in the LDP between the allocation of new growth to town or urban locations (50%) and to rural settlements (also 50%). TENP considers that in the interests of economic, social and	See LDP response.	See LDP response to Chapter 4 and Chapter 5 of the LDP.

		environmental sustainability a higher proportion than 50% should be allocated to towns and a smaller proportion to rural settlements. In the JUDP, which was only approved in July 2006, the ratio was 70:30 in favour of towns with the smaller proportion to rural areas. Since 2006 the necessity of reducing our carbon footprint has received a higher profile and this aim has recently received a greater impetus through the continuing unsettling events in the Middle East and North Africa. Promoting a settlement pattern that is likely to generate greater use of private vehicles is seen as an inappropriate policy. Please find attached a more detailed justification for this objection. TENP would like to attend the Hearing Session and have completed the Part 4 form as per the template for representations on Policies and Maps. (Copy attached). <u>Q2 - Q7</u> No comments received on questions 2 – 7. <u>Q8 Other Comments</u> TENP considers that the understanding of Sustainable Development as referred to in the LDP is very narrow and therefore the appraisal is compromised and the application of SD principles limited. the priority of economic and development objectives is confirmed by the assumption that where development objectives undermine environmental objectives then mitigation will be considered. There is no suggestion that environmental objections should take precedence! We would seem to have an LDP that assumes that development, of itself, is a good thing if only to provide work for local, small, building companies!. The concept of a 'no growth' option has not been considered, nor has a low carbon option been seriously considered. The reality is that the fundamental thinking underlying the LDP strategy is being overtaken by global events and trends; particularly the need for low carbon economies and preservation of the agricultural resource. <u>Supplementary document received:</u> Objection by TENP.		
			No change proposed.	Noted.
			No change proposed.	The definition of sustainable development in the LDP and appraisal is consistent with guidance and policy.
	TENP		See LDP response – no change proposed to SA.	See LDP response – Chapter 4 and Chapter 5. The amendment proposed is contrary to the

The Environmental Network for Pembrokeshire (TENP) has as its object *"To promote for the benefit of the public through the Network, the conservation, protection and enhancement of the natural and physical environment of Pembrokeshire and its borders (the "Area") and the contribution this makes to sustainable development"*.

TENP has circa 50 member organizations. Web site tenp.org.uk

Objection under the Test of Soundness CE2 namely:- *"The strategy, policy and allocations are realistic and appropriate having considered the relevant alternatives, and / or are founded on a robust and credible evidence base.*

The proposed strategy of the County Council to change substantially a 70 urban : 30 rural split agreed in the 2006 JUDP to a proposed 50:50 split is not considered consistent with a sustainable approach for the following reasons* - see notes below.

- a future of rising fuel prices which will particularly limit mobility for those living in rural areas and the ability of public transport to serve rural communities.
- the high proportion of locations in rural areas which are dependent on oil for heating (as opposed to mains gas).
- long term reductions in the funding of public sector services including health and social care, mobile libraries etc and these reductions will have greater impact in rural than in urban areas because of 'dead' time spent travelling to and from the smaller settlements and isolated homes making such services more expensive to deliver per head of population.
- anticipated inability for the voluntary / third sector to meet needs not catered for by public services particularly in rural areas.
- continued reductions in the number of local shops / post offices, petrol filling stations etc in rural areas as households are generally attracted to outlets offering a greater range of goods and lower prices, particularly by the supermarkets.

All of the above factors will have a disproportionate effect on the more elderly living in rural areas - a sector of the population which is forecast to grow over the Plan period** and on those under 17 who depend on others for private transport.

In addition, a higher proportion of second homes are likely to exist already in rural areas than in urban centres. ***. Without an ability to control a purchase of property to use as second homes, it is

Plan Strategy as set out in Chapter 5. The Plan Strategy is considered sound and deliverable and is supported by evidence in Background Paper HC2 Scale and Location of Growth (2010), HC3 Rural Facilities Survey Report (2010) and by additional information in supplementary Background Paper Scale and Location of Growth ADDENDUM. The Background Paper Scale and Location of Growth ADDENDUM provides a numerical breakdown of the different elements contributing to the projected Housing Land Supply for Pembrokeshire over the LDP Plan period. The paper in conjunction with Background Paper HC2 Scale and Location of Growth (2010) demonstrates how the scale and nature of housing provision at different levels of the settlement hierarchy reflect the Plan strategy and the wider key issues that the plan is seeking to resolve.

likely that the more rural the setting the greater the chance that new homes in rural areas may become second or retirement homes and hence more dependent on public / third sector services.

The Welsh Assembly Government has worked with the Sustainability Commission in the formulation of new policies under the Low Carbon Regions banner. This approach argues very strongly for homes being close to jobs and services based on the concept of increasing the viability of public transport or the ability to walk or cycle from home to work, shops etc thus reducing the need to travel by private car.

For example the One Wales : One Planet The Sustainable Development Scheme of the Welsh Assembly Government published in May 2009 includes "Our Scheme for Sustainable Development is consistent with the overarching principles of the UK shared framework: of which one of the four is to "achieve a sustainable economy by setting out how we want to transform our economy so that it is low carbon, low waste" ... a main outcome of which is " We have a low carbon transport network which promotes access rather than mobility, so that we can enjoy facilities with much less need for single occupancy car travel".

The above approaches are reflected in Planning Policy Wales Chapter 9 Housing published in July 2010; in particular

"Local Planning Authorities should promote:

- development that is easily accessible by public transport, cycling and walking.....
- mixed use development so communities have good access to employment, retail and other services". (Para 9.1.2).

Proposal - that there should be a reversion closer to the 70:30 split with an increase in the allocations for residential development in the principal settlement categories; Hub Towns, the Rural Town of Narberth and the four Service Centres (ie those with a stronger employment, service and facilities base) with correspondingly fewer 2c Service Villages at which housing allocations may be made.

Notes.

*Extracts from the Deposit Plan and from the Background Paper "Scale and Location of Growth".

"Just under half the total Pembrokeshire population (in 2006) live in

		the five main towns" (para 3.10 of the Deposit Plan). "PCC is proposing an approach where opportunities to build new homes are distributed evenly between the urban and rural areas of the County". Para 3.1 "The JUDP... sets out a strategic policy to direct 70% of new dwellings to towns. This is reflected in .. (table 3.1) .. which shows that the balance of land supply for housing moved significantly towards favouring urban areas since the JUDP became the Development Plan for Pembrokeshire." Para 3.5. "The completion of new dwellings has continued to be evenly distributes across urban and rural areas since the adoption of the JUDP, largely due to the number of planning consents gained under previous Development Plans. This has restricted the JUDP in directing housing development predominantly towards urban areas". Para 3.6. ** "The number of people over 65 is projected to increase from 20,636 in 2011 to 26,458 in 2021. This is an increase of 28%" (Para 3.8 of the Deposit Plan). *** 6.1% of all household spaces in Pembrokeshire are second homes or holiday accommodation - Source LDP Issues Paper October 2008, Issue 2 Section.		
	Countryside Council for Wales	From deposit comments letter Para 3.29 We note that there is reference to the Water Framework Directive here. The draft Water Resources Management Plan for Welsh Water identifies water resources as an issue for part of the County, and we suggest that this should be reflected in this section of the document, in the associated documentation (SA/SEA and HRA) as well as within the policies themselves as appropriate (to meet ToS CE2).	Minor wording change proposed.	Proposed change improves clarity. Text inserted to SA Report: The draft Water Resources Management Plan for Welsh Water (revised October 2011) identifies water resources as an issue for part of the county (page 692).
	Countryside Council for Wales	Thank you for giving CCW the opportunity to comment on the Sustainability Appraisal Report for Pembrokeshire Local Development Plan. We are also providing comments in separate documents on the Local Development Plan, Deposit Version and on the Habitats Regulations Environmental Report. Our comments are made in the context of our role as consultation body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and advisor to the Welsh Assembly Government on matters pertaining to the natural heritage of Wales and its coastal waters. General comments are made here and our detailed	No change proposed.	Support welcomed.

		comments are attached in Annex 1 of this letter. CCW would like to commend the Council on producing a clear and reader-friendly document, with many efforts taken to simplify and clarify the process. We note and welcome that many of our comments from previous responses have been incorporated into the Sustainability Appraisal (SA) Report, and the iterative nature of the appraisal process is well demonstrated.	No change proposed.	Support welcomed.
	Countryside Council for Wales	We do, however, have significant concerns over the nature of the assessments themselves. For the assessment of the LDP vision, strategic and general policies, there is no provision for negative evaluation. Assessments can only be scored as positive, no direct relationship or uncertain. We seek clarity urgently as to how this assessment has been carried out according to SEA due process when the full range of evaluative options (from positive to negative) are not available. This has made meaningful response on the assessments difficult to achieve. If you have any queries or would like to discuss these comments in more detail then please do not hesitate to contact Helen Fletcher in the first instance. We would be happy to meet with you to discuss further.	Minor wording change proposed.	Proposed change improves clarity. Discussions took place with CCW to clarify the assessment process for strategic and general policies. As well as the assessment of contribution towards the SA Objective and compatibility column, the assessment methodology allows for all levels of evaluation (positive, negative, etc) in the commentary column, providing a qualitative assessment. Text has been added to the SA Report to explain this process in more detail (see page 25-26 of the SA Report). Text inserted: The commentary/explanation provided against 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. This qualitative assessment addresses all potential effects of the policies.
	Countryside Council for Wales	1.1 and 1.2 Introduction and SA/SEA process There is confusion here as to the nature of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). For the Pembrokeshire Deposit LDP, a combined assessment has been carried out. This should be explicitly stated, with further explanation as to the distinction and the overlap between the SA and SEA processes.	No change proposed.	3.26 Part of the qualitative appraisal included in the commentary/explanation column of the policies includes incorporates assessment of the impact of any sustainability effects in relation to: The detail of SA and SEA processes has been described previously in the Scoping Report (Post-consultation version, January 2009). These documents collectively form the complete SA and SEA. Text inserted:
		1.12 LDP Strategy This section states that “this strategy will be implemented through	Minor wording change	Proposed change improves clarity. The

	Countryside Council for Wales	developments that comply with 16 strategic policies contained within this chapter”. It is not clear what chapter is being referred to.	proposed.	paragraph refers to a chapter in the LDP. Amended text: This strategy will be implemented through developments that comply with 16 strategic policies contained within this chapter the LDP and supported by general policies and allocations.
	Countryside Council for Wales	1.14 Conclusions of Appraisal – LDP Objectives The assessment of the LDP objectives against the SA objectives seeks to identify omission between both sets of objectives. We are not clear what is meant by omission in this context or how this relates to consistency and compatibility.	Minor wording change proposed.	Proposed change improves clarity. Amended text: The appraisal of the 10 LDP Objectives sought to test their compatibility against the SA objectives, thereby identifying any potential conflict between both sets of objectives or omission of detail in the LDP Objectives.
	Countryside Council for Wales	1.16 Conclusions of Appraisal – Allocations CCW welcomes the assessment of the allocated sites. However we suggest re-wording the summary, which states that the assessment ensures that the sites “contribute towards positive environmental, social and economic impacts on the county”. The use of the term impacts has negative connotations. The assessment has a positive focus that should be recognised.	No change proposed.	Impacts can be considered positive as well as negative.
	Countryside Council for Wales	1.17 No-plan or business as usual scenario The no plan or business as usual scenario was also assessed to determine the sustainability effects in the absence of the plan. The term ‘sustainability effects’ needs explanation.	No change proposed.	This relates to environmental, social and economic effects of the no plan scenario.
	Countryside Council for Wales	2.7 and 2.8 LDP Preferred Strategy and LDP Deposit There is a clear description of the LDP Preferred Strategy and Deposit stages. However, there is no reference as to where this document, the SA Report, fits into the process.	No change proposed.	The paragraphs referred to relate to the LD process. The SA Report relates to the Deposit plan. The SA Report is sufficiently clear without this amendment.
	Countryside Council for Wales	2.9 LDP Vision CCW has serious concerns that the reference to a “unique environment” within the Vision does not convey a clear aspiration to protect or enhance the county’s natural heritage. Further, we do not consider that the Vision achieves the balance between economic, social and environmental objectives that is required in PPW chapter 4 and recommended in the ‘LDP Manual’ (2006, section 5.5). We therefore recommend that the Vision should be amended to better reflect the need for protection and enhancement of the natural environment if it is to continue to underpin the area’s economy and social well-being as suggested. We believe this would offer greater consistency with Objective 7 of the <i>Pembrokeshire Community Plan 2010 - 2025</i> to enhance the	No change proposed.	The Plan Strategy is considered sound and deliverable, based on strong evidence and consistent with Sustainability Appraisal. The Plan is clear without amendment. The Council considers that the vision, which should be read, not in isolation but, within the context of the plan objectives in figure 1, demonstrates the balance between economic, social and environmental objectives. The approach is considered compliant with Test of Soundness C4 in that the LDP has been prepared in close conjunction with and has regard for the Pembrokeshire Community Plan

		natural environment.		
	Countryside Council for Wales	2.10 LDP Objectives and sub-objectives – CCW welcomes the list of LDP objectives and sub-objectives and the consultative process used to develop them. However, in our opinion certain key themes are missing from the objectives. These include: • Ecological connectivity/green infrastructure • Identification and protection of significant carbon stores • Water quality/quantity • Health, wellbeing, access to natural accessible green space?	No change proposed.	2010 -2025. The Plan is clear without this amendment. Para 1.19 of the Plan explains the need to read the plan as a whole. Paragraph 4.7 of the Plan explains that sustainable development is an overarching principle. Policies SP1, GN1, GN4and GN33 -37 are particularly relevant.
	Countryside Council for Wales	2.14 LDP Strategy It would be helpful here to make explicit reference to the level of growth put forward in the Preferred Strategy.	Minor wording change proposed.	Proposed change improves clarity. Amended text: The levels of growth (low, medium and high) were assessed as part of the SA in Appendix 2. The high growth option was favoured.
	Countryside Council for Wales	2.18 LDP Strategy “All new development will be expected to be sustainable”. In this context, there needs to be an explanation the term “sustainable”.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Countryside Council for Wales	Sustainability Appraisal Objectives 3.5 Topic Area: Human Health CCW commends the Authority on recognising the benefits that open space can have for human health. However, the accessibility and nature of the open space is vital in determining the benefits it can bring. We recommend that the objective refers to <i>accessible natural</i> open space.	No change proposed.	The SA Objectives were developed and agreed during previous consultations. The SA Report is sufficiently clear without this amendment. (To note that Section 3.6 refers to Human Health).
	Countryside Council for Wales	3.11 Topic Area: Climatic Factors We welcome the SA objective that focuses on climate change. However, the wording of the objective currently places the emphasis firmly on adaptation rather than mitigation. The sub-objectives themselves offer a balance between mitigation and adaptation and we suggest re-wording the objective to better reflect this balanced approach. There is also concern that the current objective implies that Pembrokeshire’s “contribution to climate change” can be dealt with in isolation from the rest of Wales and, indeed, internationally. The sub-objectives should include the need to identify and protect Pembrokeshire’s significant carbon stores.	No change proposed.	The SA Objectives were developed and agreed during previous consultations. The SA Report is sufficiently clear without this amendment.
	Countryside	3.14 Topic Area: Water While we are pleased to see the issue of water quality highlighted, this topic also needs to address the significant topic of water	No change proposed.	Water resources are considered under the topic area Material Assets. The SA Report is sufficiently clear without this amendment.

	Council for Wales	quantity/water resources and the obvious limitations that this can have for development.		
	Countryside Council for Wales	3.15 Topic Area: Soil The need to minimise soil sealing should be explicitly recognised. Increases in non-permeable surfaces through development may lead to increased flooding. Soil sealing may also destroy other essential soil functions such as regulating atmospheric gases, absorbing water to replenish groundwater supplies and providing a habitat for soil organisms. CCW also suggests a further sub-objective on the need to identify and protect significant carbon stores.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Countryside Council for Wales	3.16 Topic Area: Biodiversity, fauna and flora CCW welcomes the objective that seeks to protect, enhance and value biodiversity. We are particularly encouraged to see reference to the need to avoid habitat fragmentation and to encourage improved connectivity. This topic area should also include reference to geodiversity.	No change proposed.	Geological heritage is referenced in the Cultural Heritage (Architecture, Archaeology, and Landscape topic area (see para 3.17, page 24).
	Countryside Council for Wales	3.17 Topic Area: Cultural heritage (architecture, archaeology and landscape) As well as landscape, this objective should include reference to seascape.	No change proposed.	Seascape is included under landscape. The SA Report is sufficiently clear without this amendment.
	Countryside Council for Wales	3.19 Sustainability Appraisal of the LDP CCW welcomes the fact that SA objectives have been used to strengthen the Plan. In highlighting significant environmental concerns and environmental positives, re-wording and refinement has taken place to make the Plan more robust. This iterative process is good practice. However, there are two distinct stages to the SEA process. The SA objectives are used firstly to test the Plan objectives and policies, and then to strengthen the Plan. These stages should both be clearly described and should be kept separate from each other. Section 3.19 states that LDP policies were assessed in order to take account of their ability to progress SA objectives, raising concerns as to whether this two stage process has been observed. It would be helpful to have further information as to how the appraisal has been conducted.	Minor wording change proposed.	Proposed change improves clarity. Text inserted: The appraisal process involves a two stage process, the SA Objectives are used to test the plan objectives and policies, the SA Objectives were then used to strengthen the plan (para 3.18, page 25).
	Countryside Council for Wales	4.1 Sustainability Appraisal of the LDP Vision While CCW commends the Authority for good practice in carrying out a Sustainability Appraisal of the LDP vision, we have concerns over some of the 'scores' given. When the SA objectives concerned with climate change, air quality, waste and pollution, efficient use of resources, water quality, flooding, efficient use of	No change proposed.	Assessment of the vision is not a necessity in the SA/SEA process. This provides a general screening insight to ensure that the vision is compatible with the SA/SEA. The Plan Strategy is considered sound and deliverable, based on strong evidence and consistent with

		land, soil, biodiversity and landscape are assessed against the LDP vision, they are given a positive score, the implication being that the LDP vision contributes to positively meeting these objectives. For each of these topic areas, the evidence used for this positive score is that the vision includes reference to “an economy underpinned by the Area’s unique environment”. CCW does not believe that this is sufficient evidence to provide a positive score and we are thus unable to agree with the Authority’s positive assessment of the vision against the stated SA objectives.			
	Countryside Council for Wales	5.2 Appraisal of the LDP Objectives Appraisal of the LDP objectives against the SA objectives concludes that no objectives are considered to be incompatible with each other. CCW would suggest that it is not possible to say definitively that there are no incompatibilities when the assessment (detailed in Appendix 1) has question marks denoting uncertainty. Further detail about the uncertainty would be welcomed. An uncertain relationship evaluation may be due to a combination of positive and negative effects which can either not be adequately quantified or will depend on the complex interaction and implementation of the objective or policy. In those cases it is often extremely useful to have a description of the evaluation to at least identify what the relative conflicts are and what the balance between them might be.	Minor wording change proposed.	Sustainability Appraisal. The Plan is clear without amendment. The Council considers that the vision, which should be read, not in isolation but, within the context of the plan objectives in figure 1, demonstrates the balance between economic, social and environmental objectives. The approach is considered compliant with Test of Soundness C4 in that the LDP has been prepared in close conjunction with and has regard for the Pembrokeshire Community Plan 2010 -2025.	
	Countryside Council for Wales	6.1 Assessment of the strategic policies Two criteria are used for the assessment of the strategic policies against the SA objectives. These are whether the Policy contributes towards meeting the SA objective and whether the Policy is compatible with the SA objective. The distinction between the two criteria is not explained and is not clear. This makes it hard to fully understand, and make meaningful comment on, the assessment.	Minor wording change proposed.	Proposed change improves clarity. Uncertainties exist as the location and details of the developments are unknown. The assessment of compatibility highlights this factor. Text inserted: There is some 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. The location and specifics of each development are unknown; however each development will also be tested against other policies in the LDP which will ensure greater protection for the environment. Proposed change improves clarity. Text inserted: 6.1 The 16 strategic policies are assessed against the SA Objectives (see summary tables below). The commentary/explanation column provides a qualitative assessment of the policies and sets out the reasoning behind the prediction of the effects of the policies and their ability to meet the requirements for sustainable development. This qualitative assessment addresses all potential effects of the policies. There is also an assessment of whether the Policy contributes towards meeting the SA	

					Objective, and whether the policy is compatible with the SA Objective. This takes into account that a policy can be compatible with an SA Objective, but not have a direct relationship with the policy.
		Table 1: Summaries of strategic policy assessments It would be useful to have the actual assessment presented here and not just a summary of the words.	No change proposed.	The assessments are included in the appendices to make the document easier to read.	
	Countryside Council for Wales				
		Within Table 1, there are numerous instances where a policy is referred to as being compatible with SA objectives. CCW has two concerns about this statement. Firstly, because of the lack of a negative scoring option (see comments for section 6.4) it is not possible for the assessment to indicate incompatibility if there were any to be found. Secondly, for instances where the score given is either ? or 0, the correct interpretation of the evaluation is not that the policy is compatible with the SA objective but that it is <i>not incompatible</i> .	See proposed minor change above.	See above - text has been amended in 6.1 – 6.4.	
		SP1 Sustainable development The summary concludes that this policy is “designed in a way to achieve positive impacts”. Further clarity is sought here as to how the policy achieve positive impacts.	No change proposed.	The SA Report is sufficiently clear without this amendment. The text refers to developments being built in places appropriate for their location, and built and designed to in a way to achieve positive impacts.	
	Countryside Council for Wales				
		It is also stated that this policy is compatible with each of the SA objectives. It is not (it receives some zero scores). It should be described more accurately as <i>not incompatible</i> (this point comes up many times, see also comment for Table 1).	Minor wording change proposed.	Proposed change improves clarity. Text inserted: 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 not incompatible with any of the SA Objectives.	
		SP2 Port and energy related development The summary picks up that “a potential negative impact of port development is the impact on water quality and the marine environment”. As such, we are surprised to see that the assessment for the SA objective of water quality is not a negative one. It is not possible to give a negative score as the full range of evaluative options is not available (see comment for section 6.4).	No change proposed.	See previous clarification of assigning negative scoring symbols (see response to 6.4 above).	
	Countryside Council for Wales				
		SP4 Promoting retail development This Policy is described as <i>meeting</i> the majority of the SA	No change proposed.	The summary table provides a summary – the full assessment should be referred to in	

	Countryside Council for Wales	objectives. Further clarity is sought as to what this means – does this denote compatibility or that the Policy contributes towards the objective?		
	Countryside Council for Wales	SP5 Visitor economy The summary states that “the absence of detail within the policy makes it difficult to accurately assess the impact visitor economy may have”. We would expect this statement to be the result of an assessment with much uncertainty (indicated by question marks). This is not the case. The detailed assessment for this policy (Appendix 3) is largely positive. Further clarity is sought to explain the mismatch between the summary and the assessment.	No change proposed.	Appendix 3. The policy is not incompatible with any of the SA Objectives. The last two columns relate to compatibility and whether the policy contributes towards the SA Objective and therefore is not the overall assessment of the policy. The assessment is detailed in the commentary column (see previous comments on assessment methodology in comments under 6.1-6.4 above). Where uncertainty of effects is detailed in the assessment in this column; other policies which would address these uncertainties are quoted.
	Countryside Council for Wales	SP6 Minerals The Minerals Policy discusses “visual pollution” – an explanation of the meaning of this term is required here.. “Overall if the policy is approached in a sustainable manner the long term benefits should outweigh any short term consequences from an environmental perspective”. Care needs to be taken to ensure that positive socio-economic effects are not used to justify or balance otherwise negative environmental effects.	No change proposed.	The SA Report is sufficiently clear without this amendment. Positive socio-economic effects are not used to justify or balance negative environmental effects in this assessment.
	Countryside Council for Wales	6.7 Conclusions of Appraisal of Strategic Policies CCW commends the Authority on the iterative and consultative approach used.	No change proposed.	Support welcomed. No amendment necessary.
	Countryside Council for Wales	7.2 Assessment of the general policies The same comments apply here as we have made in relation to section 6.4 above, except the reference to the evaluation should be should be to chapter 7 and appendix 4.	Minor wording change proposed.	Proposed change improves clarity. Discussions took place with CCW to clarify the assessment process for strategic and general policies. As well as the assessment of contribution towards the SA Objective and compatibility column, the assessment methodology allows for all levels of evaluation (positive, negative, etc) in the commentary column, providing a qualitative assessment. The allocation of ‘+’ and ‘-’ symbols can be difficult to understand and weight the assessment prejudicially. Text has been added to the SA Report to explain this process in more detail (see pages 25-26, and page 43 of the SA Report See 3.23 and 3.26 above.

	Areas of Conservation (SACs) are mentioned as being nearby or adjacent, yet the potential requirements for local HRA is only reflected occasionally. We suggest that for consistency it would be better to automatically reflect this in every case where an SAC is identified as potentially being impacted.	Note that the assessment in the SA should be read with the HRA Report. Changes will also be made to the Development Sites SPG. Withybush Business Park, Haverfordwest S/EMP/040/00001: Local HRA may be required at the planning stage. Merlins Bridge Creamery Extension EMP/040/00003: Local HRA may be required at the planning stage. Withybush North of Business Park EMP/040/00005: Local HRA may be required at the planning stage. Withybush East of Business Park EMP/040/00004 and /040/00009: Local HRA may be required at the planning stage. Haven Head Business Park Northern Extension Milford Haven EMP/086/00001: Local HRA may be required at the planning stage. Dale Road, Hubberston – ALSO A WASTE SITE EMP/086/00002: Local HRA may be required at the planning stage. Adjacent to Marble Hall Road, Milford Haven EMP/086/LDP/01: Local HRA may be required at the planning stage. North of Honeyborough Industrial Estate EMP/093/00001: Local HRA may be required at the planning stage. Crymych - adjacent to Riverlea / opposite
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					Llygad-yr-Haul EMP/030/00001: Local HRA may be required at the planning stage. Celtic Link Business Park, near Scleddau – also a waste site EMP/034/00006: Local HRA may be required at the planning stage. Haverfordwest-Old Hakin Road MXU/040/01: Local HRA may be required at the planning stage. Fred Rees Site, Haverfordwest Comparison units RT/040/01: Local HRA may be required at the planning stage. Martello Quays, Pembroke Dock MAR/096/LDP/01: Local HRA may be required at the planning stage. Haverfordwest - Hermitage Farm HSG/040/00269: Local HRA may be required at the planning stage. Haverfordwest - Slade Lane North HSG/040/00273: Local HRA may be required at the planning stage. Haverfordwest - Slade Lane South HSG/040/00274: Local HRA may be required at the planning stage. Haverfordwest – between Shoals Hook Lane and bypass HSG/040/00275: Local HRA may be required at the planning stage. Haverfordwest - Scarrowscant / Glenover HSG/040/00106: Local HRA may be required at the planning stage.
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Milford Haven - Steynton Thornton Road
HSG/086/00223:
Local HRA may be required at the planning stage.

Milford Haven - Steynton Greenmeadow
HSG/086/00129:
Local HRA may be required at the planning stage.

Milford Haven - Steynton Myrtle Hill
HSG/086/00226:
Local HRA may be required at the planning stage.

Milford Haven - Hubberston West of Silverstream
HSG/086/00095:
Local HRA may be required at the planning stage.

Milford Haven - South West of The Meads
HSG/086/00222:
Local HRA may be required at the planning stage.

Milford Haven - Castle Pill
HSG/086/00318:
Local HRA may be required at the planning stage.

Milford Haven - Hubberston Adjacent to Kings Function Centre, Dale Rd
HSG/086/00002:
Local HRA may be required at the planning stage.

Neyland - East of Poppy Drive
HSG/093/00066:
Local HRA may be required at the planning stage.

Pembroke Dock - North of Pembroke Road
HSG/096/00238:
Local HRA may be required at the planning stage.

Pembroke Dock - North of Imble Lane
HSG/096/00231:
Local HRA may be required at the planning stage.

				stage. Pembroke Dock - East of Hill Farm, Imble Lane HSG/096/00233: Local HRA may be required at the planning stage. Pembroke - North & West of Railway Tunnel HSG/095/00154: Local HRA may be required at the planning stage. Pembroke - Adjacent to Monkton Swifts HSG/095/00153: Local HRA may be required at the planning stage. Pembroke - Adjacent to Long Mains & Monkton Priors HSG/095/00147: Local HRA may be required at the planning stage. Narberth - West of Bloomfield Gardens HSG/088/00078: Local HRA may be required at the planning stage. Narberth - West of Rushacre HSG/088/00077: Local HRA may be required at the planning stage. Crymych - Between the School & Station Road HSG/030/00043: Local HRA may be required at the planning stage. Crymych - East of Waunaeron HSG/030/LDP/01: Local HRA may be required at the planning stage. Abercych - Adjacent to Waterloo Cottage HSG/001/LDP/01: Local HRA may be required at the planning stage. Cilgerran - Adjacent to Holly Lodge
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					HSG/020/00062: Local HRA may be required at the planning stage. Clarbeston Road - West of Ash Grove HSG/022/00012: Local HRA may be required at the planning stage. Cosheston - South of Tinkers Fold HSG/025/00028: Local HRA may be required at the planning stage. Crundale - Opposite Woodholm Close HSG/029/00014: Local HRA may be required at the planning stage. Crundale - Land at Cardigan Slade HSG/029/00017: Local HRA may be required at the planning stage. Hook - Rear of Pill Road HSG/044/00050: Local HRA may be required at the planning stage. Houghton – Nursery HSG/045/00008 Local HRA may be required at the planning stage. Hundleton - East of Bentlass Road HSG/046/00015: Local HRA may be required at the planning stage. Llandissilio - Pwll Quarry Cross HSG/060/LDP/01: Local HRA may be required at the planning stage. Llangwm - Opposite The Kilns HSG/063/00024: Local HRA may be required at the planning stage. Maenclochog - North West of the Globe Inn
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					HSG/081/LDP/01: Local HRA may be required at the planning stage. Martletwy - West of Post Office Farm HSG/083/LDP/01: Local HRA may be required at the planning stage. Milton - West of Milton Meadows HSG/087/LDP/01: Local HRA may be required at the planning stage. Puncheston - Opposite Bro Dewi HSG/108/LDP/01: Local HRA may be required at the planning stage. Puncheston - West of Awelfa HSG/108/LDP/02: Local HRA may be required at the planning stage. Robeston Wathen - South of Robeston Court HSG/113/LDP/01: Local HRA may be required at the planning stage. Roch - East of Pilgrim's Way HSG/114/LDP/01: Local HRA may be required at the planning stage. Sageston - South of the Plough Inn HSG/015/00022: Local HRA may be required at the planning stage. St Dogmaels - Awel y Mor Extension HSG/122/00035: Local HRA may be required at the planning stage. Wolfscastle – opposite Haul y fryn HSG/149/LDP/01: Local HRA may be required at the planning stage.
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				Withybush Gypsy Site Local HRA may be required at the planning stage. Catshole (Castle) Quarry Gypsy Site Local HRA may be required at the planning stage. Slade Lane School Site, Haverfordwest CF/040/01: Local HRA may be required at the planning stage. Withybush Hospital Extension, Haverfordwest CF/040/02: Local HRA may be required at the planning stage. St Marks VA School, Haverfordwest CF/040/03: Local HRA may be required at the planning stage. Pennar CP School, Pembroke Dock CF/096/01: Local HRA may be required at the planning stage. Haverfordwest school CF/040/04: Local HRA may be required at the planning stage. Withybush East of Business Park (undeveloped residual) – also an employment site EMP/040/00004 and 040/00009: Local HRA may be required at the planning stage. Withybush North of Business Park – also an employment site EMP/040/00005: Local HRA may be required at the planning stage. Merlins Bridge Creamery and extension site – also an employment site EMP/040/00003: Local HRA may be required at the planning stage. Kingswood, Pembroke Dock EMP/096/00005:
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	Council for Wales			
	Countryside Council for Wales	Table 4 Potential cumulative effects We welcome the clear discussion of potential cumulative effects and would make specific comments on the content of the table as follows: Potential cumulative effect Habitat loss and fragmentation For affected receptors, we would like to see recognition that species are also affected.	Minor wording change proposed.	Proposed change improves clarity. Inserted text: Species inserted under Affected Receptors.
	Countryside Council for Wales	Climate change Under cause of climate change, the scope should be wider to include issues such as land management.	No change proposed.	The SA Report is sufficiently clear without this amendment. Causes in Table 4 relate to planning, land management is outside the scope of the LDP.
	Countryside Council for Wales	Degradation of water quality CCW is pleased to see recognition of potential impacts for water quality. We also suggest consideration of water quantity/water resourcing.	Minor wording changes proposed.	Proposed change improves clarity. Inserted text: Potential Cumulative Effect: Impacts on resources (including water, waste, energy) Affected Receptor - Residents - Local businesses - Habitats and species Causes Increase in development impacting resources, e.g. increased waste, increased water and energy usage. Mitigation GN 4 ensures that development proposals should minimise resource demand, improve resource efficiency and utilise power generated from renewable resources.
	Countryside Council for Wales	CCW would expect to see reference to potential cumulative effects on landscape and seascape as a line in this table. This topic is currently missing.	Minor wording changes proposed.	Proposed change improves clarity. Inserted text: Potential Cumulative Effect: Impacts on landscape Affected Receptor - Residents and visitors - All landscapes Causes Increase in developments which may impact



Appendix 3 – Assessment of the Strategic Policies

We have serious concerns about how the assessment has been carried out because of the lack of the full range of evaluative options (see comments for section 6.4).

The distinction between ‘contribute to meeting the SA objective’ and ‘compatible with the SA objective’ is also unclear.

Our comments on the assessment itself are as follows:

Minor wording change proposed.

Proposed change improves clarity. Discussions took place with CCW to clarify the assessment process for strategic and general policies. As well as the assessment of contribution towards the SA Objective and compatibility column, the assessment methodology allows for all levels of evaluation (positive, negative, etc) in the commentary column, providing a qualitative assessment. The allocation of ‘+’ and ‘-’ symbols can be difficult to understand and weight the assessment prejudicially. Text has been added to the SA Report to explain this process in more detail (see pages 25-26 and 35-36 of the SA Report).

Text inserted:
3.23 The commentary/explanation provided for against 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. This qualitative assessment addresses all potential effects of the policies.

3.26 ~~Part of~~ The qualitative appraisal included in the commentary/explanation column of the policies ~~includes~~ incorporates assessment of the impact of any sustainability effects in relation to:

6.1 The 16 strategic policies are assessed against the SA Objectives (see summary tables below). The commentary/explanation column provides a qualitative assessment of the policies and sets out the reasoning behind the prediction of the effects of the policies and their ability to meet the requirements for sustainable development. This qualitative assessment addresses all potential effects of the policies. There is also an assessment of whether the Policy contributes towards meeting the SA Objective, and whether the policy is compatible with the SA Objective. This takes into account that a policy can be compatible with an SA Objective, but not have a direct relationship with the policy.

		Issues concerning soil (SA objective 17) are consistently underrepresented. As an example, for strategic policies concerned with development, the topic of soil sealing and increasing the amount on non-permeable surface should always be flagged up.	No change proposed.	The SA Report is sufficiently clear without this amendment. The impact on drainage is covered by GN 2 which states the requirement for sustainable drainage systems (see criterion 3).
	Countryside Council for Wales			
		Greenhouse gas emissions are sometimes considered under air quality (for example with SP2, port and energy related development). They should be included under climate change (SA objective 10).	No change proposed.	The SA Report is sufficiently clear without this amendment. Greenhouse gas emissions are considered under the topic areas air quality and climatic factors.
	Countryside Council for Wales			
		The commentary/explanation and the score given do not always seem to tally. As an example, for SP1 (Sustainable development) a positive score is given even though the commentary states that “it is unclear how beneficial the policy will be”.	Minor wording change proposed.	Proposed change improves clarity. Text inserted: 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 not incompatible with any of the SA Objectives (SP 1 summary, page 110).
	Countryside Council for Wales			
		The commentary/explanation and the score given do not always seem to tally. As an example, for SP1 (Sustainable development) a positive score is given even though the commentary states that “it is unclear how beneficial the policy will be”. A further example is under SP6 Minerals, where the commentary and score for SA objective 10 (climate change) contradict each other.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Countryside Council for Wales			
		CCW seeks explanation of the statement “Provision of retail development promotes an active lifestyle and wellbeing” (under SP4 Promoting retail development, SA objective 2).	No change proposed.	The SA Report is sufficiently clear without this amendment. Retail development provides the public with access to shops which can contribute towards health and well being, for example access to a range of food retail. This also provides facilities for tourists.
	Countryside Council for Wales			
		Further explanation is sought in the commentary for SA objective 18 (biodiversity) and SP6 Minerals. A positive score is given, but there is not enough explanation to underpin this.	No change proposed.	The SA Report is sufficiently clear without this amendment. The final two columns do not ‘score’ the policy. This is done within the commentary / explanation column.
	Countryside Council for Wales			
		Negative scoring is appropriate on occasions but no negative score is possible. As an example, the commentary for SA objective 18 (biodiversity) under SP2 (port and energy related development) says that development could impact on marine habitats and yet a score of zero (no direct relationship) is given.	Minor wording change proposed.	Proposed change improves clarity. Discussions took place with CCW to clarify the assessment process for strategic and general policies. As well as the assessment of contribution towards the SA Objective and compatibility column, the assessment methodology allows for all levels of
	Countryside Council for Wales			

	Countryside Council for Wales				The General Policies from the LDP are assessed against the SA Objectives (see tables below) (page 164).
		Our comments on the assessment itself are as follows: • We would like clarity on the commentary given for GN1 (General development policy) and SA objective 10 (climate change), particularly the statement that “it is unlikely the policy will directly reduce the impacts of climate change however its effects should be positive in the long term”. We would also question why this assessment results in a positive score, which does not quite seem to tally with the commentary.	No change proposed.		The SA Report is sufficiently clear without this amendment. The final two columns do not ‘score’ the policy. This is done within the commentary / explanation column. The Policy will indirectly contribute towards reducing climate change; however in national and international terms this impact is likely to be minimal.
	Countryside Council for Wales				
		• Issues concerning soil (SA objective 17) are consistently underrepresented. As an example, for strategic policies concerned with development, the topic of soil sealing and increasing the amount on non-permeable surface should always be flagged up.	No change proposed.		The SA Report is sufficiently clear without this amendment. The impact on drainage is covered by GN 2 which states the requirement for sustainable drainage systems (see criterion 3).
	Countryside Council for Wales				
		• For GN4 (resource efficiency and low carbon energy proposals) consideration of significant carbon stores should be flagged up under SA objective 17 (soil).	No change proposed.		The SA Report is sufficiently clear without this amendment.
	Countryside Council for Wales				
		• Further clarity is sought to explain the positive score given when assessing SA objective (18) against GN4 (resource efficiency and low carbon energy proposals).	No change proposed.		The SA Report is sufficiently clear without this amendment. The final two columns do not ‘score’ the policy. This is done within the commentary / explanation column.
	Countryside Council for Wales				
		• Under SA objective 14 (water) there should be consideration of water quantity as well as quality.	No change proposed.		Water resources are considered under the topic area Material Assets. The SA Report is sufficiently clear without this amendment.
	Countryside Council for Wales				
		• For GN34 (protection and creation of outdoor recreation areas) there is a direct relationship between outdoor green space and SA objectives 15 and 17 (retaining permeable soil surfaces helps with flood regulation).	Minor wording changed proposed.		Proposed change improves clarity. Text inserted: This policy indirectly meets the SA Objective (page 259).
	Countryside Council for Wales				
		• For GN35 (protection of open spaces with amenity value) it should be recognised that open space may also be able to absorb certain types of pollutant thus improving air quality.	No change proposed.		The SA Report is sufficiently clear without this amendment.
	Countryside Council for				

	Wales			
		• GN36 (protection and enhancement of biodiversity) does not mention the vital importance of connectivity, for example in climate change adaptation. There are also links to SA objective 3 (the use of outdoor green space in education).	No change proposed.	The SA Report is sufficiently clear without this amendment. Connectivity is outlined in the reasoned justification for GN 36 see paragraph 6.149 in the Plan.
	Countryside Council for Wales	Appendix 5 Assessment of allocated sites See our comments above in section 8 8	Minor wording change proposed.	Proposed change improves clarity. Text has been added where necessary under the appropriate allocations (under SA Objective 18, and/or the summary in Appendix 5). Note that the assessment in the SA should be read with the HRA Report.
	Countryside Council for Wales	Appendix 6 Changes to the Plan CCW welcomes the table detailing changes to the Plan throughout the LDP process, which clearly demonstrates the iterative process that has been undertaken.	No change proposed.	Support welcomed.
	Countryside Council for Wales	Appendix 8 Review of policies, plans and programmes Since this document was produced, additional policies, plans and programmes have been issued. If there is opportunity in future, CCW would recommend that reference is made to the following key strategies: Welsh Assembly Government '<i>Framework for Regeneration Areas</i>', October 2010 Welsh Assembly Government '<i>Economic Renewal: a new direction</i>', July 2010 Welsh Assembly Government current consultation on '<i>A National Strategy for Flood and Coastal Erosion Risk Management for Wales</i>' Welsh Assembly Government's emerging Natural Environment Framework – <i>A Living Wales</i>	Minor wording change proposed.	Proposed change improves clarity. Relevant additional plans and policies added to Appendix 8 of SA Report.
		<u>From LDP representation Report of Objection to Policy GN.28 relating to land between the school and Station Road, Crymych</u> <u>LPA ref: HSG/030/00043</u> Following on from above, the Allocation was then subject to the second stage of assessment in the form of the Sustainability Appraisal (SA). The results of this assessment (In the form of the completed Sustainability Appraisal Matrix form) can be found at Appendix 1, but after scoring 13 positive marks and no negative marks the assessment summary reads as follows:	No change proposed.	The SA Report is sufficiently clear without this amendment. LDP response: The Plan proposals are sound, based on strong evidence and consistent with Sustainability Appraisal therefore no change is required. Evidence for this site is provided in Background Paper G10. Site Assessment Report 2010,

		“This allocation provides a logical housing site within Crymych. It is a service centre providing 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 allocated a site within Crymych (HA750, Depot Site). This site is allocated for 15 units and is unlikely to impact upon the PCC LDP.” Notwithstanding the above, we would question some of the scoring given by the LPA, in particular with respect to SA Objective 5. SA Objective 5 assess whether an Allocation with “ Provide a range of high quality housing including affordable housing to meet local needs.”. Taking into account the information presented in this Report and in particular at Section 4.1, it is extremely doubtful as to whether the Allocation will be in a position to deliver any new housing, let alone that which will be of an affordable nature. The fact that the Allocation, despite being allocated in the JUDP, has failed to deliver any housing for almost 10 years raises clear doubt as to whether the Site would meet the requirements of the SA Objective 5 and so undermining the Allocation’s primary purpose. On this basis, the Allocation has therefore been incorrectly assessed with respect to SA. SEE LDP REP		paragraphs 2.39-2.42. Furthermore, the Background Paper 'Scale and Location of Growth' provides evidence that has informed the strategic direction of the Plan and supports the proposed distribution of housing growth in the plan area. The housing allocation HSG/030/00043 is well located to services and the site benefits from a strong natural boundary that ensures it remains proportionate in size to the settlement. Whilst this site was previously allocated for housing under the JUDP, the allocation was larger as it extended into the adjacent school playing grounds. However this area has now been excluded from the proposed allocation HSG/030/00043 to ensure that the open space remains available for the school. The allocation is deliverable and the site constraints that have been identified can be overcome. Therefore it is considered appropriate that the proposed allocation HSG/030/00043 should remain in the Plan. Housing need in this settlement is sufficiently met by this allocation HSG/030/00043 together with HSG/030/LDP/01.
	Pembrokeshire Coast National Park Authority	Comments on SA of SP2 1. Develop & maintain a balanced population structure Given that balancing the population structure is about increasing the ratio of younger people to older people, then the provision of relatively well paid jobs, as is likely with development of the county’s ports, is likely to attract/retain younger people.	No change proposed.	The SA Report is sufficiently clear without this amendment. SP 2 would be implemented within the context of GN policies. There are controls in place to secure positive impacts / avoid negative impacts via specific policies, for example GN 1-4, GN 6, GN 9, GN 22, GN 35-38 and GN 40 plus the corresponding reasoned justification paragraphs.
	Pembrokeshire Coast National Park Authority	2. Promote & improve human health & well being through a healthy lifestyle, access to healthcare & recreation opportunities & a clean & healthy environment It is difficult to see how the policy might contribute to meeting the Sustainability Objective, its impacts would be at best neutral and could be seriously negative.	No change proposed.	The SA Report is sufficiently clear without this amendment. Development may improve areas of the port through regeneration and providing access to a clean and healthy environment.
	Pembrokeshire Coast National Park Authority	3. Improve education opportunities to enhance the skills & knowledge base Agree	No change proposed.	Support welcomed. No amendment necessary.

	Pembrokeshire Coast National Park Authority	4. Minimise the need to travel and encourage sustainable modes of transport There are too many 'ifs' in the assessment to conclude a positive contribution. Though the development would be in an already well populated area to provide a work force.	Minor wording change proposed.	Proposed change improves clarity. Text inserted: These locations for employment development are close to housing / potential workforce with significant potential for reducing the need to travel and providing sustainable modes of public transport / infrastructure (page 111 of SA Report). The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	5. Provide a range of high quality housing including affordable housing to meet local needs Unless the proposed uses were mixed with residential (and in most cases it is likely that the industrial use will preclude this), the policy will have no impact on the Sustainability Objective.	No change proposed.	
	Pembrokeshire Coast National Park Authority	6. Build safe, vibrant & cohesive communities which have improved access to key services and facilities In uncertainty expressed in the commentary does not justify the ticks with regard to contribution and compatability	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	7. Protect & enhance the role of the Welsh Language & culture The outcome would depend on whether the workforce was drawn from the existing linguistic culture, or from further afield, and as such is uncertain.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	8. Provide a range of good quality employment opportunities accessible to all sections of the population Agree	No change proposed.	Support welcomed. No amendment necessary.
	Pembrokeshire Coast National Park Authority	9. Support a sustainable & diverse local economy Agree with regard to diverse economy. The sustainability element will depend on the success of shipping industry initiatives to reduce it's emissions and fuel requirements, as fuel prices increase.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	10. Prepare for & reduce the impact of Pembrokeshire's contribution to climate change The assessment is dependent on the nature of the development, and therefore a positive contribution or relationship cannot be assumed. Development should ensure that port activity is protected from short and medium term sea level rise	No change proposed.	The SA Report is sufficiently clear without this amendment. Other policies within the Plan will secure the nature of the development and the resilience of new development to short and medium term sea level rise.
	Pembrokeshire Coast National Park Authority	11. Maintain & improve air quality The positive conclusion relies on significant low carbon development which may not happen. Development based on current nature of activity could have a negative impact with regard	No change proposed.	The SA Report is sufficiently clear without this amendment. Other policies within the Plan will ensure positive impacts of Port related development

		to the Sustainability Objective.		
	Pembrokeshire Coast National Park Authority	12. Minimise the generation of waste & pollution The positive conclusion relies on a lot of 'ifs' with regard to the exact nature of development. Development based on current nature of activity could have a negative impact with regard to the Sustainability Objective.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	13. Encourage the efficient production, use, reuse & recycling of resources Positive assessment relies on 'coulds' and 'shoulds', though there is an opportunity for the Port Authority and its partners to be a exemplar of sustainable development there is no certainty of this	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	14. Maintain & protect the quality of inland & coastal water The tick for the contribution and the commentary are inconsistent. The commentary suggests, at best, long term neutrality with short term negative impact, therefore the overall conclusion must be that the policy is negative with regard to the Sustainability Objective.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	15. Reduce the impact of flooding & sea level rise There is an opportunity to reduce the vulnerability of costal defences, but the positive conclusion is dependent on a number of 'ifs'.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	16. Use land efficiently & minimise contamination If the most likely areas for development are already industrial sites on developed coast, then PCC's tick conclusions are probably justified, but their own commentary questions this due to its uncertainty	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	17. Safeguard soil quality & quantity Agree	No change proposed.	Support welcomed. No amendment necessary.
	Pembrokeshire Coast National Park Authority	18. Protect, enhance & value biodiversity PCCs commentary suggests a negative impact rather than no relationship. Development may also result in permanent loss of habitat which may adversely impact on the Pembrokeshire Marine SAC.	No change proposed.	The SA Report is sufficiently clear without this amendment.
	Pembrokeshire Coast National Park Authority	19. Protect & enhance the landscape & geological heritage If development were to take place on currently undeveloped land in the Haven (e.g. on the coastal slopes near Waterston) the result may be regarded as a further degradation of the landscape of the	No change proposed.	The SA Report is sufficiently clear without this amendment. There are controls in place to secure positive impacts / avoid negative impacts via specific policies, for example GN 1-

		waterway. Fishguard & Goodwick are in an area of relatively undeveloped coast and a highly valued landscape, here the potential for significant negative landscape impact is great, even with careful design.			4, GN 6, GN 9, GN 22, GN 35-38 and GN 40 plus the corresponding reasoned justification paragraphs.
	Pembrokeshire Coast National Park Authority	20. Encourage quality locally distinct design that complements the built heritage The commentary doesn't justify the conclusion with regard to the contribution to the Sustainability Objective. It could be argued that any further development is likely to complement the industrial vernacular of the waterway	No change proposed.		The SA Report is sufficiently clear without this amendment. GN 2 ensures design is appropriate to the local character and context.
	Pembrokeshire Coast National Park Authority	21. Protect, enhance & value the built heritage & historic environment The assessment that any development should enhance the historic environment might be regarded as optimistic given that we might be considering the significant industrial development of an important economic asset (the Haven). Having said that the modern history of the waterway is characterised by significant petrochemical infrastructure. Development around Fishguard and Goodwick has the potential to harm the setting of these settlements and the Pen Caer Historic Landscape area at Strumble Head.	No change proposed.		The SA Report is sufficiently clear without this amendment. GN 1-4 and GN 35 will secure positive SA outcomes.
	Pembrokeshire Coast National Park Authority	Summary The assessment is unjustifiably positive with regard to the environmental impact of the policy, particularly when there is no clarity in the Plan as to what areas might be developed and what would be acceptable where. Generally there are many cases where the summary conclusion in terms of the ticks doesn't align with concerns expressed in the commentary.	No change proposed.		The SA Report is sufficiently clear without this amendment. Site specific application of the policy is being introduced as a focussed change, in response to representation on the LDP made by the respondent. This, together with the context of GN policies 1-4, 6, 9, 22, 35-38 and 40 should address the concerns raised regarding 'unjustifiable positivity'.