



# HABITATS REGULATIONS ASSESSMENT SCREENING REPORT

# CONSULTATION DRAFT

Pembrokeshire Coast National Park  
Authority

Local Development Plan



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PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

LOCAL DEVELOPMENT PLAN

## CONSULTATION DRAFT

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# **Pembrokeshire Coast National Park Authority**

## **Local Development Plan**

### **Habitats Regulations Assessment Screening Report**

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## EXECUTIVE SUMMARY

- 0.1 Habitats Regulations Assessment (HRA) of spatial, development plans is a requirement of the Habitats Directive (92/43/EEC) as set out in the amended Habitats Regulations (2007). This report details the HRA Screening for the Pembrokeshire Coast National Park Authority, Local Development Plan: Deposit Plan. It sets out the methods and findings and the conclusions of the Screening Assessment.
- 0.2 The screening assessment considered the potential for impacts arising from the Pembrokeshire Coast National Park Authority, Local Development Plan: Deposit Plan and the likelihood that the impacts arising would result in significant effects on the seventeen European sites scoped into the Screening Assessment.
- 0.3 The screening concluded that there is potential for likely significant effects at seven European sites [Carmarthen Bay SPA, Carmarthen Bay and Estuaries SAC, North West Pembrokeshire Commons SAC, Pembrokeshire Bats and Bosherton Lakes SAC, Pembrokeshire Marine SAC, St David's SAC, Ramsey and St David's Peninsula Coast SPA] as a result of identified impacts arising primarily from the proposed housing and employment allocations within the National Park.
- 0.4 In order to fully determine likely significant effect further information is required on the capacity of sewerage systems and treatment works to accommodate the level of development proposed, especially in relation to Tenby. Further information is also needed in relation to recreational activities with the National Park and potential sensitivities of the identified sites to particular recreational activities. The information will be gathered to inform an Appropriate Assessment which will use detailed analysis to assess, and where possible quantify, the potential impacts identified and determine the most effective mechanism for avoiding or mitigating those effects.
- 0.5 This screening opinion is subject to consultation and advice from the statutory body the Countryside Council for Wales.

## 1.0 INTRODUCTION

- 1.1 Pembrokeshire Coast National Park Authority (PCNPA) is currently developing its Local Development Plan (LDP) and is undertaking Habitats Regulations Assessment in line with the requirements set by the Conservation (Natural Habitats &c) (Amendment) Regulations 2007.
- 1.2 This HRA Screening report addresses the likely significant effect[s] on designated European Site[s] of implementing the policies and proposals of the LDP.
- 1.3 Habitats Regulations Assessment is also commonly referred to as Appropriate Assessment (AA) although the requirement for AA is first determined by an initial 'screening' stage undertaken as part of the full HRA. This report addresses the Screening Phase of the HRA; it outlines the screening tasks and the key findings emerging from the assessment.

### Requirement for Habitats Regulations Assessment

- 1.4 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 (N2K) sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) [which are classified under the Council Directive 79/409/EEC on the conservation of wild birds, the 'Birds Directive'].
- 1.5 Articles 6 (3) and 6 (4) of the Habitats Directive require AA to be undertaken on proposed plans or projects which are not necessary for the management of the site but which are likely to have a significant effect on one or more European sites either individually, or in combination with other plans and projects.<sup>1</sup> In 2007, this requirement was transposed into UK law in Part IVA of the Habitats Regulations (The Conservation (Natural Habitats, & c.)(Amendment) (England and Wales) Regulations 2007). These regulations require the application of HRA to all land use plans. Welsh Assembly Government (WAG) guidance also requires that Ramsar sites (which support internationally important wetland habitats) and are listed under the Convention on Wetlands of International Importance (Ramsar Convention 1971) are included within HRA/AA and that candidate SACs and proposed SPAs are treated as 'designated' sites in the context of HRA.

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<sup>1</sup> Determining whether an effect is 'significant' is undertaken in relation to the designated interest features and conservation objectives of the Natura 2000 sites. If an impact on any conservation objective is assessed as being adverse then it should be treated as significant. Where information is limited the precautionary principle applies and significant effects should be assumed until evidence exists to the contrary.

- 1.6 The purpose of HRA/AA is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity<sup>2</sup> of that site. Where significant negative effects are identified, alternative options or mitigation measures should be examined to avoid any potential damaging effects. The scope of the HRA/AA is dependent on the location, size and significance of the proposed plan or project and the sensitivities and nature of the interest features of the European sites under consideration.

### **Guidance for Habitats Regulations Assessment/Appropriate Assessment**

- 1.7 Draft guidance for HRA 'The Assessment of Development Plans in Wales under the Provisions of the Habitats Regulations', has been produced by WAG, (David Tyldesley and Associates, October 2006). The final WAG guidance is yet to be published, but is expected to be available in 2008.<sup>3</sup> A partnership of consultants<sup>4</sup> has also prepared guidance (Appropriate Assessment of Plans, August 2007) to assist planning bodies in complying with the Habitats Directive.
- 1.8 The methods and approach used for this screening are based on the formal Welsh guidance currently available and emergent practice, which recommends that HRA is approached in three main stages – outlined in **Table 1**. This report outlines the method and findings for stage 1 of the HRA process.

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<sup>2</sup> Integrity is described as the sites' coherence, ecological structure and function across the whole area that enables it to sustain the habitat, complex of habitats and/or levels of populations of species for which it was classified, (ODPM, 2005).

<sup>3</sup> Informal consultation with WAG has been undertaken to ascertain the nature and extent of any key changes to the Draft guidance in support of this HRA process (April, 2008).

<sup>4</sup> Scott Wilson, Levett-Therivel Sustainability Consultants, Treweek Environmental Consultants and Land Use Consultants (August, 2006).

Table 1	
Habitats Regulations Assessment: Key Stages	
<b>Stage 1</b>	
<b>Screening for likely significant effect</b>	<ul style="list-style-type: none"> <li>▪ Identify international sites in and around the plan/ strategy area in search area/ buffer zone agreed with the Statutory Body the Countryside Council for Wales</li> <li>▪ Examine conservation objectives of the interest feature(s)(where available)</li> <li>▪ Review plan policies and proposals and consider potential effects on European sites (magnitude, duration, location, extent)</li> <li>▪ Examine other plans and programmes that could contribute to 'in combination' effects</li> </ul>
	<ul style="list-style-type: none"> <li>▪ <i>If no effects likely – report no significant effect (taking advice from CCW as necessary).</i></li> <li>▪ <i>If effects are judged likely or uncertainty exists – the precautionary principle applies proceed to <b>stage 2</b></i></li> </ul>
<b>Stage 2</b>	
<b>Appropriate Assessment</b>	<ul style="list-style-type: none"> <li>▪ Complete additional scoping work including the collation of further information on sites as necessary to evaluate impact in light of conservation objectives</li> <li>▪ Agree scope and method of AA with CCW</li> <li>▪ Consider how plan 'in combination' with other plans and programmes will interact when implemented (the Appropriate Assessment)</li> <li>▪ Consider how effect on integrity of site could be avoided by changes to plan and the consideration of alternatives</li> <li>▪ Develop mitigation measures (including timescale and mechanisms)</li> <li>▪ Report outcomes of AA including mitigation measures, consult with CCW and wider [public] stakeholders as necessary</li> <li>▪ If plan will not significantly effect European site proceed without further reference to Habitats Regs</li> </ul>
	<ul style="list-style-type: none"> <li>▪ <i>If effects or uncertainty remain following the consideration of alternatives and development of mitigations proceed to <b>stage 3</b></i></li> </ul>
<b>Stage 3</b>	
<b>Procedures where significant effect on integrity of international site remains</b>	<ul style="list-style-type: none"> <li>▪ Consider alternative solutions, delete from plan or modify</li> <li>▪ Consider if priority species/ habitats affected</li> <li>▪ Identify 'imperative reasons of overriding public interest' (IROPI) economic, social, environmental, human health, public safety</li> <li>▪ Notify Assembly Government</li> <li>▪ Develop and secure compensatory measures</li> </ul>

## Consultation

- 1.9 The Habitats Regulations require the plan making/competent authority to consult the appropriate nature conservation statutory body [Countryside Council for Wales (CCW)]. Consultation on the approach to this HRA screening, including advice on which European sites should be considered within the area of search, has been undertaken with CCW as required (October 2008). The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. The WAG guidance notes that it is good practice to make information on HRA available to the public at each formal development plan consultation stage. Therefore, in addition to the statutory consultation undertaken with CCW this report is being made available as part of the wider public consultation on the Local Development Plan

## Purpose & Structure of Report

- 1.10 This report documents the process and the findings from the Screening stages of the HRA for PCNPA's LDP Deposit Plan. Following this introductory section the document is organised into a further three sections:
- **Section 2** - outlines the method used for the Screening process and includes reference to the key information sources used.
  - **Section 3** - outlines the process and summary findings of the Screening Process and the assessment
  - **Section 4** - outlines the conclusions, including the consultation commentary and how the plan should proceed with reference to the Habitats Regulations.



## 2.0 METHOD

### Screening

- 2.1 In accordance with the official Welsh guidance and current practice, conducting the screening stage of the HRA for PCNPA's LDP Deposit Plan employed the method outlined below. This approach combines both a **plan** focus and a **site** focus.
- The **plan** focus first screens out those elements of the plan unlikely to affect European site integrity and then considers the impacts of the remaining elements on European sites, including the potential for 'in-combination' impacts.
  - The **site** focus considers the environmental conditions of the site and the factors required to maintain site integrity, and looks at the potential impacts the plan may have.
- 2.2 HRA experience to date has indicated that maintaining a site based approach as core to the HRA/AA method more closely reflects the intent of the Habitats Directive. This means that subsequent mitigation measures [developed if/as required during the AA stage 2] seek to focus on the conditions necessary to maintain site integrity (e.g. avoiding specific types of development/ activity at or near sensitive areas). This approach ensures that where decisions on site integrity are necessarily devolved to lower tier planning document assessment, they are focused on the relevant area, whilst also allowing for circumstances where policy caveats in relation to specific developments may be the most relevant solution.
- 2.3 The key tasks employed for the HRA Screening are set out in **Table 2**.

<b>Table 2</b>	
<b>HRA Screening Stage 1: Key Tasks</b>	
<p><b>Task 1</b></p> <p><b>Identification of Natura 2000 sites &amp; characterisation</b></p>	<ul style="list-style-type: none"> <li>■ Identification of European sites both within the plan/proposal boundaries and in an area of search extending to 15km [as recommended by extant guidance] around the plan/proposal area. This includes considering hydrological connectivities and the catchment of watercourses relating to identified designations</li> <li>■ Information was obtained for each European site, based on publicly available information and consultation with Countryside Council for Wales where appropriate.<sup>5</sup></li> <li>■ This included information relating to the sites' qualifying features; conservation objectives; vulnerabilities/ sensitivities, current conditions, trends &amp; geographical boundaries.</li> </ul>
<p><b>Task 2</b></p> <p><b>Plan review and identification of likely impacts</b></p>	<ul style="list-style-type: none"> <li>■ Screening of the plan/proposal and the identification of likely impacts (including a review of the plan/proposal's aims, objectives, strategic policies, including spatial implications where identified to determine likely impacts).</li> </ul>
<p><b>Task 3</b></p> <p><b>Consideration of other plans and programmes</b></p>	<ul style="list-style-type: none"> <li>■ Consideration, where appropriate of other plans and programmes that may have in-combination effects with the plan/proposal.</li> </ul>
<p><b>Task 4</b></p> <p><b>Screening Assessment</b></p>	<ul style="list-style-type: none"> <li>■ Assessment of the potential of identified impacts to affect the designated interest features of European sites</li> <li>■ Summary of screening outcomes and recommendations.</li> </ul>

2.4 As part of the screening process consideration was also given to the concurrent Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) work which has informed the development of the LDP Deposit Plan as well as related HRA work undertaken at a strategic level (the HRA of the Wales Spatial Plan Update) and neighbouring authorities' HRAs, where available.

<sup>5</sup> Key Information Sources: Joint Nature Conservation Committee (JNCC) web resource [www.jncc.gov.uk](http://www.jncc.gov.uk) including site details/ character contained on Natura 2000 Standard Data Form. Conservation Objectives, management plan information, Countryside Council for Wales web resource <http://www.ccw.gov.uk/>

### 3.0 SCREENING

#### Task 1: Identification of European Sites & characterisation

- 3.1 Pembrokeshire Coast National Park (PCNP) includes the majority of Pembrokeshire's coast, offshore islands, the upper part of the Daugleddau Estuary and the Preseli Hills. It covers a total area of 240 sq miles, which includes 258 miles of coastline and is the UK's only National Park designated primarily for its coastal scenery. PCNP is internationally important for its coastal, marine and lowland heath habitats, which support biodiversity of international and national importance. This is reflected by the number of conservation designations: 7 Special Areas of Conservation, 3 Special Protection Areas, 1 Marine Nature Reserve, 6 National Nature Reserves, and 75 Sites of Special Scientific Interest (SSSI). Approximately 80% of the length of the National Park coastline is designated SSSI, including 30% designated as Geological Conservation Review sites.
- 3.2 There are seventeen European sites within the PCNPA boundary. Detailed site characterisation information for the sites, is provided in **Appendix 1**.

<b>Table 3</b>	
<b>European Sites within Plan/ Proposal Boundary</b>	<b>Designation</b>
■ Cardigan Bay	SAC
■ Carmarthen Bay and Estuaries	SAC
■ Cleddau Rivers	SAC
■ Gweunydd Blaencleddau	SAC
■ Limestone Coast of South West Wales	SAC
■ North Pembrokeshire Woodlands	SAC
■ North West Pembrokeshire Commons	SAC
■ Pembrokeshire Bat Sites and Bosherton Lakes	SAC
■ Pembrokeshire Marine	SAC
■ Preseli	SAC
■ River Teifi	SAC
■ St David's	SAC
■ Carmarthen Bay	SPA
■ Castlemartin Coast	SPA
■ Grassholm	SPA
■ Ramsey and St David's Peninsula Coast	SPA
■ Skokholm and Skomer	SPA

- 3.3 Plans, programmes and projects can have spatial implications that extend beyond the intended plan boundaries. In particular, it is recognised that distance in itself is not a definitive guide to the likelihood or severity of an impact [inaccessibility/ remoteness is

typically more relevant] as factors such as the prevailing wind direction, river flow direction, and ground water flow direction will all have a bearing on the relative distance at which an impact can occur. This means that a plan directing development some distance away from a European Site could still have effects on the site and therefore, needs to be considered as part of the screening process.

- 3.4 Taking into account the potential for transboundary impacts the screening scope in consultation with CCW has identified two European Sites that lie within a 15km search area around PCNPA administrative boundary. These sites are outlined in Table 4 below and detailed information for each designated site including its conservation objectives is provided in Appendix 1.

<b>Table 4</b>		
<b>European Sites within a search area of 15km around Plan/Proposal Area</b>	<b>Designation</b>	<b>Distance from Plan/ Proposal Boundary (approx)</b>
■ Carmarthen Bay Dunes	SAC	5.8km
■ Yerboston Tops	SAC	1.9km

**Task 2: Plan/Strategy review, policy screening and identification of likely impacts**

**Pembrokeshire Coast National Park, Local Development Plan: Deposit Plan Summary Review**

- 3.5 The PCNPA LDP is the Development Plan for the Authority over a 15 year period during which it provides a framework for development within the National Park. The LDP implements the land use planning dimension of the PCNPA Management Plan and seeks to minimise projects that do not meet with the aims and objectives of the overarching National Park Management Plan, which are of national importance. Accordingly, the LDP is closely connected to the National Park Management Plan through a linked vision and related objectives. The LDP comprises a strategy and integrated set of policies and site specific proposals to guide development.

The Vision for the Deposit Plan describes the land use elements of the National Park Management Plan Vision. It:

- Has a 15 year horizon
- Is particular with this National Park
- Takes account of the Welsh Assembly Government’s agenda and policy and regional, partner and neighboring authorities’ strategies and plans
- Reflects national and international trends
- Captures the essence of what people have told the PCNPA in surveys and conferences.

The Deposit Plan objectives set out how the vision will be achieved and are based on six priority issues:

- National Park purposes, major development, the potential growth
- Climate change, sustainable design, flooding, sustainable energy
- Visitor economy, employment and rural diversification
- Affordable housing and housing growth
- Community facilities
- Special qualities

Overall the LDP's strategy reflects the wider criteria and aims of National Park designation in only allowing for:

- moderate housing development: **938 new houses** over the period of the plan and
- **5.93 hectares** of employment and mixed use land.

#### **Pembrokeshire Coast National Park, Local Development Plan: Deposit Plan Screening Plan/Proposal**

- 3.6 The PCNPA LDP Deposit Plan was - for the purposes of the HRA - subject to an initial screening process. The aim of this screening is to identify at a broad level those policies that will not have an effect on European Sites and those that have the potential to have a significant effect at the sites identified at Task 1.
- 3.7 The approach taken builds on and is in accordance with screening approaches used in the UK for Regional and Sub-Regional Strategies and more recent revisions of these criteria produced to support HRA screening of plans.<sup>6</sup> PCNPA LDP Deposit policies were screened on the basis of the following criteria.

#### **Reasons why a policy will not have an effect on a European Site**

1. The policy itself will not lead to development.
2. The location of the development is unknown, and will be selected following consideration of options in lower plans.
3. The policy will have no effect because development is dependent on implementation of lower tier policies.
4. The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.

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<sup>6</sup> The Assessment of Regional Spatial Strategies and Sub-regional strategies under the Provisions of the Habitats Regulations: Draft (David Tyldesley Associate, for English Nature, 2006). As applied to the Neath Port Talbot UDP Appropriate Assessment (June 2007). Tyldesley, D and Associates (2008) Habitats Regulations Assessment of Spatial Planning Documents, (RTPI presentation, 11 Dec 08).

- 5. The policy will steer development away from European sites and associated sensitive areas.
- 6. The policy is intended to protect the natural environment, including biodiversity.
- 7. The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.

**Reasons why a policy could have an effect on a European Site**

- 8. The plan/ policy steers a quantum or type of development towards or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site.

**Reasons why a policy/ plan would be likely to have a significant effect**

- 9. The policy makes provision for a quantum of kind of development that in the location(s) proposed would be likely to have a significant effect on a European site. Appropriate Assessment required.

3.8 The full Policy Screening Tables, including the rationale for a policy screening decision based on the above criteria are provided in **Appendix 2**. Of the 52 policies screened, 9 policies were considered to be proposing development that may have significant effects at the European sites identified at Task 1. The 9 policies screened in to the assessment process are outlined in **Table 5**.

Table 5
Plan/ Proposal Policies Screened in to the assessment process
Deposit Plan Policies: <ul style="list-style-type: none"> <li>■ Policy 1 - Tenby Local Service and Tourism Centre</li> <li>■ Policy 2 - Newport Local centre</li> <li>■ Policy 3 - Saundersfoot Local Centre</li> <li>■ Policy 4 - St David’s Local Centre</li> <li>■ Policy 5 - Rural Centres</li> <li>■ Policy 23 - Visitor Economy</li> <li>■ Policy 30 - Employment Sites and Live/Work Units</li> <li>■ Policy 32 - Housing</li> <li>■ Policy 52 - Porthgain, Saundersfoot, Solva and Tenby Harbours</li> </ul>
Site Allocations (contained within policies 30 & 32): <ul style="list-style-type: none"> <li>■ MA707 Tenby</li> <li>■ HA377 Tenby</li> <li>■ HA724 Tenby</li> <li>■ HA752 Tenby</li> <li>■ HA760 Tenby</li> </ul>

- MA232 Newport
- HA825 Newport
- HA737 St David's
- HA704 Broad Haven
- HA734 Broad Haven
- HA559 Lawrenny
- HA733 St Ishmael's

3.9 Of the seventeen European sites scoped into the HRA screening seven were identified as potentially affected:

- **Carmarthen Bay SPA**
- **Carmarthen Bay and Estuaries SAC**
- **North West Pembrokeshire Commons SAC**
- **Pembrokeshire Bats and Bosherton Lakes SAC**
- **Pembrokeshire Marine SAC**
- **St David's SAC**
- **Ramsey and St David's Peninsula Coast SPA**

3.10 The identified impacts, and the potential effects of those impacts on the seven European sites, are summarised in Table 6.

Table 6: Potential impacts of BBNP LDP on Natura 2000 sites	
Identified Impacts	Potential Effects
<b>Recreational Pressure</b>	Recreational pressure on land (e.g. through trampling, climbing, coasteering) can result in erosion and the disturbance of species. On water, disturbance to species can be significant in relation to site integrity, especially during particular times of the year when protected bird species are breeding/ moulting.
<b>Water Quality</b>	New developments - housing & employment result in sewage and effluent discharges that may contribute to increased nutrients at Natura 2000 sites.  A growth in commercial and recreational use of the water environment raises the likelihood of pollution incidents (e.g. fuel spillage, emissions).
<b>Water Abstraction</b>	Water resources for Pembrokeshire - which is considered as one resource zone, comes from a combination of reservoirs (Preseli Rosebush, Llys-y-Fran - fed by the River Syfynwy) and river abstraction (Western/ Eastern Cleddau). Groundwater abstractions are available in times of drought. Dwr Cymru (21/07/08) in response to site allocations

<b>Table 6: Potential impacts of BBNP LDP on Natura 2000 sites</b>	
<b>Identified Impacts</b>	<b>Potential Effects</b>
	<p>consultation state that “Based on future demands already shared with us we do not foresee any problems at present in meeting the anticipated domestic demands during the life of the Local Development Plan. Water is a precious resource and in line with Government objectives on sustainable development we would look to promoters of developments to have considered and included where feasible, water efficient devices within buildings and sustainable drainage measures” .</p> <p>Under the Habitats Regulations the Environment Agency Wales has a duty to assess the effects of existing abstraction licences and any new applications to make sure they are not impacting on internationally important nature conservation sites. Water efficiency is also tested by the EAW before a new licence is granted and they are required to carry out HRA against new abstraction licenses.</p> <p>On the basis of the information provided and the assumption that no proposal would be implemented that is contrary to national planning policy, it is assessed that the Deposit Plan will not significantly affect European sites as a result of increased abstractions.</p>
<b>Atmospheric Pollution</b>	European sites are potentially vulnerable to a range of pollutants. Nitrogen oxides, sulphur dioxide and ammonia can all contribute to acidification, with nitrogen deposition specifically implicated in eutrophication. Vehicle exhaust fumes comprise up to 50% of measured nitrogen oxide emissions and can be expected to rise where population centres are set for expansion.
<b>Habitat Fragmentation</b>	Development can lead to loss of wooded areas and vegetation cover (including scrub) and habitat links, such as hedgerows and even sections of walls and fences. This is particularly important for bat species as this habitat is used for foraging and movement between roosts.
<b>Development in rural areas and of rural/disused buildings</b>	Disused/ rural building can provide valuable habitats for protected species-in particular bats, which also use established paths for foraging. Landuse changes and new developments can have significant negative effects in relation to feeding and migration



Table 6: Potential impacts of BBNP LDP on Natura 2000 sites	
Identified Impacts	Potential Effects
	patterns.

### Task 3: Consideration of other plans and programmes

- 3.11 It is a requirement of Article 6(3) of the Habitats Directive that HRA examines the potential for plans and projects to have a significant effect either individually or 'in combination' with other plans, programmes & projects (PPPs). Undertaking an assessment of other PPPs for the PCNP LDP Deposit Plan has required a pragmatic approach given the extensive range of PPPs underway in the surrounding region. The approach taken was cognisant of the emphasis in the forthcoming WAG guidance, that considering the potential for in-combination effects is core to delivering robust/precautionary HRA.
- 3.12 When considering other PPPs attention was focused on those aimed at delivering planned spatial growth with the most significant being those that seek to provide, housing, employment and infrastructure. The review considered the most relevant plans including:
- The Wales Spatial Plan (update) 2008
    - Local Development Plans in South West Wales neighbouring authorities
    - Waste Strategies for South West Wales and neighbouring authorities
    - Regional Transport Plans - where relevant and/or major development schemes
    - Catchment Abstraction Management Plans – where relevant to the designated sites under consideration
- 3.13 The potential effects of these plans are reviewed in detail at **Appendix 3** and the potential for these effects to act 'in-combination' with effects identified from the PCNPA LDP Deposit Plan are considered in the screening assessment [**Appendix 5**]. The range of in-combination impacts considered was focused on the key issues outlined below:
- **Recreational pressures** - arising from population growth and the promotion of coastal and water based recreation in Pembrokeshire County and the National Park area leading to erosion, disturbance & trampling.
  - **Water pollution** - as result of increased pressure on sewerage system capacity/ flow due to increased development and potential growth in the recreational use of the water environment, which raises the likelihood of pollution incidents (e.g. fuel spillage, emissions).

#### Task 4: Screening Assessment

- 3.14 In line with the screening requirement of the Habitats Regulations, an assessment was undertaken to determine the potential significant effects of the PCNP LDP Deposit Plan on the integrity of the seven European sites identified through the first stage of the screening process as being affected by the implementation of the LDP. The screening decision was informed by:
- The information gathered on the European sites - **Appendix 1**;
  - The review of Deposit Plan policies and site allocations (**Appendix 4**) and their likely impacts (**Appendix 2**); which included an analysis of the potential environmental impacts generated by the development activities directed by the LDP and;
  - The review of other relevant plans and programmes - **Appendix 3**
  - WAG guidance which indicates that HRA for plans is typically broader and more strategic than project level HRA and that it is proportionate to the available detail of the plan.

#### Screening Assessment Summary

- 3.15 The full detail of the main screening exercise including the rationale for assessment conclusions is set out in **Appendix 5** and the results of the assessment are summarised in the paragraphs below and at **Table 7**.

#### Carmarthen Bay and Estuaries

- 3.16 Carmarthen Bay is a wide, shallow bay west of the Gower Peninsula. It is approximately 28 km from east to west by 20 km north to south; the SAC embraces the whole of the bay. The site is vulnerable to changes in hydrophysical and chemical conditions, therefore reductions in water quality and changes to the hydrological regime are likely to have significant effects. PCNP Deposit Plan directs housing and employment development in Tenby and Saundersfoot, which are in close proximity to Carmarthen Bay and Estuaries SAC. The level of development proposed could have impacts on sewerage system capacity/ flow, which could lead to increased levels of diffuse pollution and therefore reduced water quality. EAW have expressed concerns about the large amount of development proposed for Tenby and the implications for infrastructure, such as sewer system capacity/ flows.
- 3.17 There is also the potential for in-combination effects on Carmarthen Bay and Estuaries SAC as a result of increased levels of diffuse pollution. Development proposed in Pembrokeshire CC and NP Joint UDP around Kilgetty and Gegelly could lead to further reductions in water quality. Carmarthen is situated on the River Tywi approximately 1.2km

upstream from Carmarthen Bay and Estuaries SAC. Development proposed in the Carmarthen UDP therefore has the potential to reduce the water quality of the River Tywi, which ultimately flows into Carmarthen Bay. There is therefore the potential for likely significant in-combination effects from adjoining development plans as a result of increased levels of diffuse pollution, which could lead to reduced water quality. Further information is required on the capacity of sewerage systems and treatment works to accommodate the level of development proposed in Tenby in order to determine likely significant effects.

### **North West Pembrokeshire Commons SAC**

- 3.18 The North-West Pembrokeshire Commons SAC is situated on the St David's Peninsula, north-east of the settlement of the same name and is vulnerable to uncontrolled burning and atmospheric pollution. The Deposit Plan proposes 118 new dwelling in St David's as well as a 0.93 hectare employment site. There is the potential for increased traffic along the A487, which is less than 200m from the SAC. The promotion of tourism within the National Park could also lead to increases in traffic and therefore airborne pollutants. There is potential for significant effects as the dry heath is vulnerable to airborne pollutants such as nitrous oxides from vehicle exhausts.
- 3.19 Site allocation HA737 proposes 90 new dwellings and is less than 200m from North West Pembrokeshire Commons SAC. The potential effects from this allocation include increases in airborne pollutants (nitrous oxides from vehicle exhausts) and the possibility of increased levels of unauthorised burning. Further information is required on the potential impacts of this allocation and the sensitivity of the SAC to possible increases in traffic along the A487 in order to determine likely significant effects.

### **Pembrokeshire Bat Sites and Bosherton Lakes SAC**

- 3.20 The Bat Sites and Bosherton Lakes SAC, is underpinned by a series of eight Sites of Special Scientific Interest (SSSI), which are spread out across Pembrokeshire County. The site supports approximately 9.5% of the UK greater horseshoe bat population. The deposit plan proposes housing and mixed use development in Newport, which is less than 1km away from Felin Llwyn-gwair SSSI, which is a Greater Horseshoe Bat maternity and roost site and forms part of the Pembrokeshire Bat Sites and Bosherton Lakes SAC.
- 3.21 Potential impacts of increased housing and employment development includes an increase in population and an increase traffic flow. The potential effect of this development on the Greater Horseshoe Bat is increased disturbance and possible loss of foraging habitat. This could be due to increased recreation and/or disturbance during construction, which can cause an increase in noise, fumes and lights. The Pembrokeshire Bat Sites and Bosherton Lakes SAC Management

Plan indicates that within 1km of roosts it is vital to retain wooded areas and vegetation cover (including scrub), and habitat links i.e. woodland, tree lines, hedgerows and even limited sections of walls and fences. Further information is required on greater horseshoe bat flight lines and foraging areas to determine the likely effects of the development proposed in Newport.

### **Pembrokeshire Marine SAC**

- 3.22 The Pembrokeshire Marine SAC extends from just north of Abereddy on the north Pembrokeshire coast to just east of Manorbier in the south and includes the coast of the islands of Ramsey, Skomer, Grassholm, Skokholm, the Bishops and Clerks and The Smalls. The Deposit Plan proposes development in a number of locations that are in close proximity to the SAC in St David's, Solva and a number of rural locations. Potential impacts arising as a result of the proposed development include increased levels of recreation and increased pressure on sewerage system capacity/ flow. This could lead to potentially significant effects on the SAC through increased disturbance and reduced water quality. There is also the potential for cumulative impacts from adjoining development plans - development proposed in the Pembrokeshire CC and NP Joint UDP has the potential to reduce the water quality of the Cleddau Rivers, which ultimately flow into the Pembrokeshire Marine SA.
- 3.23 There is potential for significant effects on Pembrokeshire Marine SAC through increased recreational disturbance and reduced water quality. As a top predator, seals are prone to accumulation of contaminants present within their food chains. Further information is required on the capacity of sewerage systems and treatment works to accommodate the level of development proposed and the sensitivity of the site in relation to increased recreational activity.

### **St David's SAC**

- 3.24 St David's SAC includes two major sections of coast in addition to Ramsey and several smaller islands. These sections of cliff-land carry fine examples of a wide range of typical maritime vegetation, ranging from rock-crevice communities on the most exposed cliff faces to maritime grassland, heath and scrub in the hinterland. They have numerous rare plants and invertebrates, and a high density of nesting chough and peregrine falcon. The Deposit Plan proposes development in close proximity to the SAC in St David's and Solva. Potential impacts arising as a result of the proposed development include increased levels of recreation. This development in combination with the promotion of tourism in National Park could lead to potentially significant effects on the SAC through increased recreational disturbance on the Vegetated Sea Cliffs, localised impacts of climbing and coasteering. Further information is required in relation to the potential increase in recreation on the Vegetated Sea Cliffs.

### **Carmarthen Bay SPA**

- 3.25 Carmarthen Bay is a wide, shallow bay west of the Gower Peninsula. The Carmarthen Bay SPA is used regularly by circa 1.1 % of the biogeographic population of migratory and overwintering common scoter. Within the UK, Carmarthen Bay is the most important site for this species. The Deposit Plan directs housing and employment development in Tenby and Saundersfoot. Potential impacts of this development are increased population and employment growth, which could lead to increased recreational pressure on Carmarthen Bay SPA. Carmarthen Bay SPA is 1-1.2km offshore, increased commercial and recreational use of boats has the potential to increase disturbance to the Common Scoter at their feeding grounds.
- 3.26 There is also the potential for in-combination effects from adjoining development plans (increased recreational pressure) and the promotion of coastal and water based recreation in Pembrokeshire. This could contribute to increased levels of disturbance to the Common Scoter at their feeding ground. One of the conservation objectives for the Common Scoter is that "they are allowed to inhabit their feeding grounds and resting areas with minimum disturbance and no disturbance on their moulting ground at Cefn Sidan, and may move unhindered between them<sup>7</sup>". Any increase in water based recreation within the SPA has the potential to have likely significant effect on Carmarthen Bay SPA. Further information is required in relation to recreation levels in Carmarthen Bay and the sensitivity of the Common Scoter to commercial and recreational boat use.

### **Ramsey and St David's Peninsula Coast SPA**

- 3.27 This site includes one major section of coast running around the peninsula of St David's in addition to Ramsey and several smaller islands. These coastal habitats support an important resident population of Chough. These birds nest at high density in traditional locations within the cliffs and depend on the diverse mix of coastal habitats present and their low intensity agricultural management. The Deposit Plan proposes development in close proximity to the SPA in St David's and Solva. Potential impacts arising as a result of the proposed development include increased levels of recreation. This development in-combination with the promotion of tourism in National Park could lead to potentially significant effects on the SPA through increased recreational disturbance to the Chough, particularly from tourists walking the coast path. The impact of this disturbance is minimised by most of the nest sites being on inaccessible high cliffs, and by the numbers of visitors to Ramsey being strictly limited, however, further

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<sup>7</sup> CCW (2005) Carmarthen Bay and Estuaries European Marine Site. Regulation 33 draft advice. Available online: <http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/special-sites-project/reg-33-plans.aspx>

information is required on the potential increase of recreational activity along the coastal path.

<b>Table 7 HRA Screening Table Summary</b>			
<b>European Sites within Plan/proposal boundaries</b>	<b>Designation</b>	<b>AA required alone?</b> ✗ No ✓ Yes ? Uncertain	<b>AA required in combination?</b> ✗ No ✓ Yes ? Uncertain
Carmarthen Bay	SPA	✓	✓
Carmarthen Bay and Estuaries	SAC	✓	✓
North West Pembrokeshire Commons	SAC	✓	✗
Pembrokeshire Bats and Bosherton Lakes	SAC	✓	✓
Pembrokeshire Marine	SAC	✓	✓
St David's	SAC	?	✓
Ramsey and St David's Peninsula Coast	SPA	?	✓

#### 4.0 CONCLUSIONS, FUTURE WORK

- 4.1 This report outlines the methods used and the findings arising from the screening stage of the Habitats Regulations Assessment undertaken for the PCNP LDP Deposit Plan.
- 4.2 The HRA considered 17 European Site within the plan/ proposal boundaries and 2 European sites within a 15km search area around the plan/proposal boundaries.
- 4.3 The findings of the screening process suggested the potential for significant effects at 7 European Sites within plan area boundary. These sites are:
- **Carmarthen Bay SPA**
  - **Carmarthen Bay and Estuaries SAC**
  - **North West Pembrokeshire Commons SAC**
  - **Pembrokeshire Bats and Bosherton Lakes SAC**
  - **Pembrokeshire Marine SAC**
  - **St David's SAC**
  - **Ramsey and St David's Peninsula Coast SPA**
- 4.4 In line with the precautionary approach as required by the Habitats Directive these sites should be subject to a more detailed AA. The AA will require the more detailed information as indicated by the screening analysis to assess, and where possible quantify, the potential impacts identified and determine the most effective mechanism for avoiding or mitigating those effects. This work will need to take place in consultation with the Statutory Body, CCW and other key stakeholders as necessary.
- 4.5 This HRA screening opinion is subject to consultation with CCW, and PCNPA will take advice from the Statutory Body and other relevant stakeholders, in taking forward the AA work and recommended inputs to the development plan process. Accordingly, this screening assessment may be revised should further relevant comments be received or if there are significant changes to the plan/ proposal as screened.

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