

Pembrokeshire Coast National Park

Local Development Plan 2

(end date-2031)

Addendum to the Sustainability Appraisal Report

October 2019

**Pembrokeshire Coast National Park
Authority**

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Executive Summary

This document is an addendum to the Local Development Plan Sustainability Appraisal (SA) Report.

Changes have been proposed to the Replacement Local Development Plan through the Examination Process, these are set out in the Schedule of Matters Arising Changes (MACs) to the Local Development Plan 2 (Replacement) as submitted in December 2018.

This report assesses these changes through the Sustainability Appraisal process comprising:

1. Screening all of the proposed Matters Arising Changes to identify changes where further Sustainability Appraisal is required.
2. Carrying out detailed assessment of Matters Arising Changes that have not been 'screened out'
3. Considering the overall effect on the Sustainability Appraisal of the Replacement Local Development Plan

The findings of this process are set out in tables 3.1 and 4.2. Sections 4 and 5 provide a summary of the assessments, conclusions and recommendations.

When the Replacement Local Development Plan is adopted, the National Park Authority will publish a Post Adoption Statement for the Sustainability Appraisal that explains how the process has influenced the development of the Replacement Local Development Plan.

This addendum highlights the effects of the proposed Matters Arising Changes have with regard to the Deposit Plan Sustainability Appraisal. Following screening and consideration through detailed appraisals, no implications on the overall Sustainability Appraisal of the Deposit Plan were identified.

1.0 Introduction

- 1.1 As a consequence of the Replacement Local Development Plan Examination process the National Park Authority has considered a series of changes to the Replacement Local Development Plan. These changes are known as Matters Arising Changes (MACs) and are set out in the Schedule of Matters Arising Changes.
- 1.2 Proposed changes to the Replacement Local Development Plan require screening for impacts with regard to the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) check if they will alter or introduce additional “likely significant effects” beyond those predicted in the Deposit Replacement Local Development Plan Sustainability Appraisal report.
- 1.3 This report provides an Addendum to the March 2018 Deposit Replacement Local Development Plan Sustainability Appraisal Report and identifies if that report should be updated in light of the MACs and how that update would be applied. This report, although an Addendum, should be read in conjunction with the Deposit Sustainability Appraisal Report (March 2018).
- 1.4 This document contains the following:
 - A screening of the Matters Arising Changes to see if they ‘materially’ change what was assessed in the Deposit Sustainability Appraisal Report.
 - A detailed assessment where screening has indicated this is required.
 - Conclusions and recommendations setting to clarify where references in the Deposit Sustainability Appraisal Report should be changed and consideration of any potential significant effects on the overall Sustainability of the Plan which would result from the proposed Matters Arising Changes.

2.0 Context

2.1 Sustainability Appraisal is a statutory requirement for Local Development Plans under Section 62(6) of the Planning and Compulsory Purchase Act 2004. The purpose of Sustainability Appraisal is to assess the social and economic effects of the component policies, proposals and strategy elements of the Local Development Plan to ensure that decisions accord with the principles of sustainable development.

2.2 Accordance with the sustainable development principle is defined in the Well-being of Future Generations Act (Wales) 2015:

“In this Act, any reference to a public body doing something “in accordance with the sustainable development principle” means that the body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs” (Section 5: Sustainable Development Principle (1)).

2.3 The Welsh Government define sustainable development in Wales through the Well-being of Future Generations (Wales) Act 2015 as:

“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals” (a more comprehensive description of the Act, its goals and how the Sustainability Objectives contribute to them can be found in Section 5 of the Sustainability Appraisal Scoping Report (June 2016).

2.4 For the purposes of land use planning, the Planning (Wales) Act 2015 performs a function as part of carrying out sustainable development in accordance with the Well-being of Future Generations Act (Wales) 2015

“...for the purpose of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales” (Part 2 Sustainable Development, 2(2)).

2.5 The Welsh Government Local Development Plan Manual indicates that a Sustainability Appraisal must integrate the requirements of the Strategic Environmental Assessment Regulations. The requirements of EU Directive 2001/42/EC (also known as the SEA Directive) have been transposed into Welsh Law through The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. Strategic Environmental Assessment requires the formal assessment of certain plans and programmes that are likely to have significant effects on the environment; this includes Local Development Plans.

2.6 The National Park Authority has a duty under the Equality Act 2010 to assess the impact of its policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. This has been carried out through an Equality Impact Assessment (EqIA).

2.7 TAN 20 states that the Sustainability Appraisal should assess evidence of the impacts of the spatial strategy, policies and allocations on the Welsh language whilst the Planning (Wales) Act 2015 contains provisions relating to the consideration of the Welsh language in the appraisal of development plans.

2.8 Health Impact Assessment (HIA) is not a statutory requirement; however, health considerations are a requirement of the Strategic Environmental Assessment process and thereby the overall Sustainability Appraisal process.

3.0 Screening of Matters Arising Changes

- 3.1 As a consequence of the Replacement Local Development Plan Examination process the National Park Authority has considered a series of changes to the Replacement Local Development Plan. These changes are known as Matters Arising Changes (MACs) and are set out in the Schedule of Matters Arising Changes.
- 3.2 The Matters Arising Changes proposed have the potential to change the assessment of likely effects on social, economic and environmental factors. However, the majority of the changes proposed are minor or related to updates, references or clarifications and are not significant in terms of their impact on the Sustainability Appraisal.
- 3.3 Table 3.1 below sets out the initial Sustainability Appraisal screening of all of the Matters Arising Changes in order to identify those that could have significant effects. Each of the proposed Matters Arising Changes have been compared against the Deposit Plan policies and supporting information to check if the original policy provisions have been changed and if the Deposit Plan Sustainability Appraisal assessments or assumptions still remain valid.

Table 3.1: Sustainability Screening Matters Arising Changes

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC1	Insert new paragraphs after paragraph 1.6	Clarify how the key components of the strategy align with the Wales Spatial Plan. <i>HS1/AP6</i>	No	Clarification of the Plan strategy.
MAC2	Delete paragraphs 4.2 to 4.6	Revise the Strategy section to explain the overarching strategy and its key components. <i>HS1/AP6</i>	No	Clarification of the Strategy.
MAC3	Amend Paragraphs 4.7, 4.8 and 4.9. Insert new table after paragraph 4.7. Delete paragraph 4.10.	Revise the Strategy section to explain the overarching strategy and its key components. <i>HS1/AP6</i>	No	Clarification of the Strategy.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC4	Delete paragraphs 4.14 – 4.24	Revise the Strategy section to explain the overarching strategy and its key components. <i>HS1/AP6</i>	No	Clarification of the Strategy.
MAC5	Insert new paragraphs after Policy 1 – National Park Purposes and Duty	Revise the Strategy section to explain the overarching strategy and its key components. <i>HS1/AP6</i>	No	Clarification of the Strategy.
MAC6	Insert Key Diagram to follow the new paragraphs inserted after Policy 1 – National Park Purposes and Duty	Amendment necessary to provide certainty about the spatial context for development in the National Park <i>HS1/AP3</i>	No	Clarification of the Strategy/ presentation.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC7	Amend Tenby heading and paragraphs 4.25, 4.27 and 4.28	Redefine settlement hierarchy to ensure it is more locally distinct. <i>HS1/AP7</i>	No	Clarification of the Strategy.
MAC8	Amend Policy 2 – Tenby Service and Tourism Centre	Redefine settlement hierarchy to ensure it is locally distinct and provide clarity about traffic management. <i>HS1/AP7 and HS1/AP9</i>	No	Clarification of the Strategy.
MAC9	Amend Policy 3 – Newport Local Service Centre	Redefine settlement hierarchy to ensure it is locally distinct and provide clarity about traffic management. <i>HS1/AP7 and HS1/AP9</i>	No	Clarification of the Strategy.
MAC10	Amend Policy 4 – Saundersfoot Local	Redefine settlement hierarchy to ensure it is locally distinct and provide clarity	No	Clarification of the Strategy.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
	Service Centre	about traffic management. <i>HS1/AP7 and HS1/AP9</i>		
MAC11	Amend Policy 5 – St Davids Local Service Centre	Redefine settlement hierarchy to ensure it is locally distinct and provide clarity about traffic management. <i>HS1/AP7 and HS1/AP9</i>	No	Clarification of the Strategy.
MAC12	Amend Policy 6 - Rural Centres	Redefine settlement hierarchy to ensure it is locally distinct and provide clarity about infill requirements and traffic management. <i>HS1/AP7, HS1/AP9 and HS1/AP11</i>	No	Clarification of the Strategy.
MAC13	Delete first sentence of paragraph 4.46	To improve clarity the text will be relocated to Policy 6	No	Clarification.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS1/AP11</i>		
MAC14	Amend paragraph 4.49	To provide clarity about the management of housing delivery throughout the settlement hierarchy <i>HS6/AP8</i>	No	Consequential amendment.
MAC15	Policy 7 – Countryside	To provide clarity about the management of housing and affordable housing delivery throughout the settlement hierarchy <i>HS1/AP12 and HS7/AP4</i>	Yes	Removal of Policy 7(a) has implications for the assessment of the effects of Policy 7.
MAC16	Delete Paragraph 4.51	In discussion with Welsh Government prepare an overarching policy for the management of housing delivery throughout the settlement hierarchy, and make consequential amendments to policies 2,3,4,5,6 and 7	No	Consequential amendment.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS6/AP8</i>		
MAC17	Amend Paragraph 4.54	To provide clarity about the management of housing delivery throughout the settlement hierarchy <i>HS7/AP2</i>	No	Clarification of policy wording.
MAC18	Amend Policy 9 – Light Pollution	Amends necessary to clarify the requirements of the policy. <i>HS2/AP1</i>	No	Clarification of policy wording.
MAC19	Amend paragraph 4.70	Amends necessary to clarify the requirements of the Policy 9. <i>HS2/AP1</i>	No	Clarification of policy wording.
MAC20	Amend Policy 10 - Sites and Species of European Importance	Amends necessary to clarify the requirements of the policy.	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS2/AP2</i>		
MAC21	Amend Policy 11 - Nationally Protected Sites and Species	Amendment necessary to clarify the requirements of the policy. <i>HS2/AP2</i>	No	Presentational.
MAC22	Amend Policy 12 - Local Areas of Nature Conservation or Sites of Geological Interest	Amend Policy 12 to make reference to avoidance, mitigation and compensation to provide clearer policy advice for the reader. <i>HS2/AP4</i>	No	Policy reworded for clarity, protections remain unchanged.
MAC23	Amend paragraph 4.73	Amend Policy 12 and its reasoned justification to make reference to avoidance, mitigation and compensation to provide clearer policy advice for the reader.	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS2/AP4</i>		
MAC24	Amend paragraph 4.75	To ensure certainty amend the proposals map to include the local sites of geomorphic importance where formally designated. <i>HS2/AP3</i>	No	Protections remain unchanged.
MAC25	Delete Policy 13 – Protection of Biodiversity	To avoid unnecessary duplication Policy 13 is deleted. <i>HS2/AP4</i>	No	Protections remain unchanged.
MAC26	Amend Policy 14 - Development in Welsh Language-Sensitive Areas	Amends necessary to clarify the requirements of the policy. <i>HS2/AP5</i>	No	Clarification of policy.
MAC27	Amend paragraphs 4.83 and 4.85	Amends necessary to clarify the requirements of the Policy 14.	No	Clarification of policy.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS2/AP5</i>		
MAC28	Delete Policy 15 - Protection of Buildings of Local Importance and paragraphs 4.90, 4.91 and 4.92	To accord with the requirements of national policy. <i>HS2/AP6</i>	No	The predicted effect on the SA Objectives in the absence of this policy is neutral as the protection of historic assets of local importance is a statutory requirement of the Historic Environment (Wales) Act 2016 and Policy 8(d) still provides a framework for protection.
MAC29	Amend paragraph 4.102	Amends necessary to clarify the requirements of the policies in respect of open space and Green Wedges.	No	Clarification of policy wording.
MAC30	Move paragraph 4.103 down below New Policy Open Space	Amends necessary to clarify the requirements of the policies in respect of open space and Green Wedges.	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS2/AP7</i>		
MAC31	Amend Policy 17 – Open Space and Green Wedges	Amends necessary to clarify the requirements of the policies in respect of open space and Green Wedges. <i>HS2/AP7</i>	No	Clarification of policy wording.
MAC32	Insert new Policy – Open Space and paragraph after paragraph 4.102	Amends necessary to clarify the requirements of the policies in respect of open space and Green Wedges. <i>HS2/AP7</i>	No	Policy protection in accordance with national policy remains unchanged. Sites protected unchanged.
MAC33	Insert paragraph 4.103	Amends necessary to clarify the requirements of the policies in respect of open space and Green Wedges. <i>HS2/AP7</i>	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC34	Insert new Policy – Green Wedges after paragraph 4.103	Amends necessary to clarify the requirements of the policies in respect of open space and Green Wedges. <i>HS2/AP7</i>	No	Policy protection in accordance with national policy remains unchanged. Sites protected unchanged.
MAC35	Amend paragraph 4.105	Amends necessary to clarify the requirements of new policies in respect of open space and Green Wedges. <i>HS2/AP7</i>	No	Cross reference update.
MAC36	Amend Policy 18 – Shore Based Facilities	Amendment necessary to clarify the requirements of the Policy. <i>HS2/AP9</i>	No	Clarification of policy wording.
MAC37	Policy 19 - Porthgain, Saundersfoot, Solva and Tenby Harbours	Amendment necessary to clarify the requirements of the Policy. <i>HS2/AP9</i>	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC38	Amend Policy 21 - Scale and Growth Policy	Amendment necessary to clarify the requirements of the Policy. <i>HS1/AP6</i>	No	Clarification of the Strategy.
MAC39	Amend Policy 24 – Borrow Pits	Amendment necessary to clarify the requirements of the Policy. <i>HS3/AP1</i>	No	Clarification of policy wording.
MAC40	Amend paragraph 4.141	Amendment necessary to clarify the requirements of the Policy 24. <i>HS3/AP1 and HS3/AP2</i>	No	Clarification of policy wording.
MAC41	Amend paragraph 4.143 and 4.144	Amendment necessary to clarify the requirements of the Policy 25. <i>HS3/AP2</i>	No	Clarification of policy wording.
MAC42	Amend paragraphs 4.154 and 4.156	Amendment necessary to clarify the requirements of the Policy.	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS3/AP3</i>		
MAC43	Amend Policy 30 - Sustainable Design	Amendment necessary to clarify the requirements of the Policy. <i>HS4/AP1</i>	No	Clarification of policy wording.
MAC44	Amend paragraph 4.164	Amendment necessary to clarify the requirements of the Policy 30 <i>HS4/AP1</i>	No	Clarification of policy wording.
MAC45	Amend Policy 31 - Amenity	Amendment necessary to clarify the requirements of the Policy. <i>HS4/AP3</i>	No	Clarification of policy wording.
MAC46	Amend paragraph 4.166	Amendment necessary to clarify the requirements of the Policy 31.	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS4/AP3</i>		
MAC47	Amend Policy 34 - Renewable and Low Carbon Energy	Amendment necessary to provide greater clarify the requirements of the policy. <i>HS4/AP4</i>	No	No changes to the SA assessment, minor positive implications for SA Objective 7 but not significant.
MAC48	Insert new paragraphs after 4.186	Amendment necessary to provide greater clarify the requirements of the Policy 34. <i>HS4/AP4</i>	No	Clarification of policy wording.
MAC49	Amend Policy 37 - Relocation of Existing Permanent Dwellings affected by Coastal Change	Amendment necessary to clarify the requirements of the Policy. <i>HS4/AP5</i>	No	Clarification of policy wording.
MAC50	Amend Policy 38 - Relocation and replacement of development (other than residential)	Amendment necessary to clarify the requirements of the Policy.	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
	affected by coastal change	<i>HS4/AP5</i>		
MAC51	Amend paragraph 4.202	Amendment necessary to clarify the requirements of the Policy 38. <i>HS4/AP5</i>	No	Clarification of policy wording.
MAC52	Amend Policy 39 - Visitor Economy	Amendment necessary to clarify the requirements of the Policy. <i>HS5/AP3</i>	No	Clarification of policy wording.
MAC53	Amend Policy 40 - Loss of Hotels and Guest Houses	Amendment necessary to clarify the requirements of the Policy. <i>HS5/AP6</i>	No	Clarification of policy wording.
MAC54	Amend Policy 42 - Caravan, Camping and Chalet Development	Amendment necessary to clarify the requirements of the Policy.	No	Clarification of Policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS5/AP7</i>		
MAC55	Amend paragraph 4.231	Amend paragraph 4.231 to accord with the requirements of WG Circular 016/2014. <i>HS5/AP5</i>	No	Updated reference.
MAC56	Amend Policy 43 - Site Facilities on Camping, Chalet and Caravan Sites	Amendment necessary to clarify the requirements of the Policy. <i>HS5/AP8</i>	No	Clarification of Policy wording.
MAC57	Amend paragraph 4.233	Amendment necessary to clarify the requirements of Policy 43.	No	Clarification of Policy wording.
MAC58	Amend paragraph 4.273	Amendment necessary to clarify the requirements of Policy 49.	No	Rolling forward of figures. Quantum of development unchanged.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS7/AP2</i>		
MAC59	Amend paragraphs 4.278 and 4.281	Amendment necessary to clarify the requirements of Policy 48. <i>HS6/AP1</i>	No	Clarification of policy wording.
MAC60	Table 5 Components of Housing Land Supply	Amendment necessary to provide updated housing supply figures. <i>HS6/AP1</i>	No	Updating of figures. Quantum of development proposed unchanged.
MAC61	Table 6 Components of Affordable Housing Land Supply	Amendment necessary to provide updated affordable housing supply figures. <i>HS7/AP7</i>	No	Rolling forward of figures. Quantum of development unchanged.
MAC62	Amend paragraph 4.284	Amendment necessary to clarify the requirements of Policy 48.	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS6/AP1</i>		
MAC63	Update Policy 47 housing land supply figure	Amendment necessary to provide updated housing supply figures. <i>HS6/AP1</i>	No	Updating of figures. Quantum of development proposed unchanged.
MAC64	Insert new paragraph after Policy 47 Housing	Amendment to the reasoned justification of Policy 47 is necessary to clarify the level of the flexibility allowance. <i>HS6/AP6</i>	No	Clarification of policy wording.
MAC65	Policy 48 Housing Allocations	Amendments to Policy 48 are necessary to provide accurately differentiate between allocated sites and sites with planning permission on the 31 st March 2019 <i>HS6/AP7</i>	No	Clarification of policy wording
MAC66	Amend paragraphs 4.287 and 4.288	Amend to the reasoned justification of Policy 48 is necessary to explain the information contained in Appendix 4 of the Plan.	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
		<i>HS6/AP6</i>		
MAC67	Delete Table 7 Housing Allocations - Requirements	Amendment necessary to make clear the detailed requirements of the policy. <i>HS6/AP7</i>	No	Clarification of strategy.
MAC68	Delete Table 8 Potential Large Windfall Housing Sites	Amendment necessary to make clear the detailed requirements of the policy.	No	Clarification of strategy.
MAC69	Delete Policy 49 – Affordable Housing	Amendment necessary to make clear the detailed requirements of the policy. <i>HS7/AP3</i>	No	New, clearer, version of policy 49 ceated (see MAC70).
MAC70	Insert new Policy 49 – Affordable Housing	Amendment necessary to make clear the detailed requirements of the policy. <i>HS7/AP3</i>	No	Clarification of policy wording.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC71	Insert new paragraphs after Policy 49	Amendment necessary to make clear the detailed requirements of the policy. <i>HS7/AP3</i>	No	Clarification of Policy wording.
MAC72	Amend paragraph 4.291 and insert new paragraphs	Amendment necessary to make clear the detailed requirements of the policy. <i>HS9/AP3</i>	No	Clarification of Policy wording.
MAC73	Delete paragraph 4.293 and 4.295	Amendment necessary to make clear the detailed requirements of the policy. <i>HS7/AP4</i>	No	Clarification of Policy wording.
MAC74	Insert new paragraph before paragraph 4.296	To address the requirements of national planning policy. <i>HS7/AP1</i>	No	Proposals going forward may be beneficial. SA Objective 8.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC75	Insert new Policy - Affordable Housing Exception Sites after paragraph 4.296	To accord with the requirements of national planning policy and provide an appropriate policy to assess proposals for affordable housing exception sites. <i>HS7/AP4</i>	Yes	Likely to be positive implications for SA Objectives concerning sustaining communities (8) and equality of access (9). Effects against the other SA Objectives are likely to be uncertain or minor negative, accepting that there are unavoidable impacts of development.
MAC76	Insert new paragraphs after new Policy – Affordable Housing Exception Sites	To accord with the requirements of national planning policy and provide an appropriate policy to assess proposals for affordable housing exception sites. <i>HS7/AP4</i>	No	Clarification of policy wording.
MAC77	Insert new Policy – Housing Development Proposals after New Policy Affordable Housing Exception Sites and its reasoned	To provide a clear policy for assessing proposals for housing development on non-allocated sites.	No	Components of the policy are set out in other policies of the Plan which have already been assessed.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
	justification.	<i>HS6/AP8</i>		
MAC78	Insert new paragraph after new Policy – Housing Development Proposals	To provide a clear policy for assessing proposals for housing development on non-allocated sites. <i>HS6/AP8</i>	No	Clarification of policy wording.
MAC79	Amend Policy 50 – Housing Densities	Amendment necessary to make clear the detailed requirements of the policy in respect of housing densities. <i>HS7/AP10</i>	No	SA effects remain the same, policy provisions have simply been split across two policies.
MAC80	Insert new Policy – Housing Mix after Policy 50 – Housing Densities	Amendment necessary to make clear the detailed requirements of the policy in respect of housing mix. <i>HS7/AP10</i>	No	SA effects remain the same, policy provisions have simply been split across two policies.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC81	Amend paragraph 4.300	Amendment necessary to make clear the detailed requirements of the policy in respect of housing densities. <i>HS7/AP10</i>	No	Clarification of policy wording.
MAC82	Amend Policy 51 – Gypsy, Travellers and Showpeople Sites	Amendment necessary to clarify the requirements of the policy. <i>HS7/AP11</i>	No	Clarification of policy wording.
MAC83	Amend paragraph 4.301	Amendment to the reasoned justification necessary to clarify the requirements of the policy. <i>HS7/AP11</i>	No	Clarification of policy wording.
MAC84	Delete Policy 52 - One Planet Development	Deletion necessary to comply with the requirements of national planning policy. <i>HS7/AP12</i>	No	Policy is not required as provisions exist within National Policy framework.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC85	Delete paragraphs 4.303 – 4.306	Deletion necessary to comply with the requirements of national planning policy. <i>HS7/AP12</i>	No	Consequential change.
MAC86	Amend paragraph 4.310	Amendment necessary to clarify the requirements of the plan in respect of community facilities and infrastructure. <i>HS5/AP10</i>	No	Clarification of policy wording.
MAC87	Amend Policy 53 - Community Facilities	Amendment necessary to clarify the requirements of the plan in respect of community facilities and infrastructure. <i>HS5/AP10</i>	No	Clarification of policy wording.
MAC88	Insert New Policy – Infrastructure Requirements after Policy 53	Amendment necessary to clarify the requirements of the plan in respect of community facilities and infrastructure. <i>HS5/AP10</i>	No	SA effects remain the same, policy provisions have simply been split across two policies.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC89	Insert new paragraph after new Policy – Infrastructure Requirements	Amendment necessary to clarify the requirements of the plan in respect of community facilities and infrastructure. <i>HS5/AP10</i>	No	Consequential change.
MAC90	Amend paragraph 4.311	Amendment necessary to clarify the requirements for new retail floorspace. <i>HS5/AP9</i>	No	Clarification of policy wording
MAC91	Policy 54 - Retail in the National Park	Amendment necessary to clarify the requirements of the policy. <i>HS5/AP9</i>	No	Clarification of policy wording. Policy approach is unchanged.
MAC92	Monitoring Indicator 23 -	Update indicator to reflect the revised Affordable Housing Target. <i>HS9/AP3</i>	No	Rolling forward of supply figures. Quantum of development unchanged.

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MAC93	Amend Monitoring Chapter to include new Indicator – General Market Housing	Amend the monitoring framework to include the new indicators set out in relation to the delivery of general market housing. <i>HS9/AP4</i>	No	No Implications for the SA but will inform SA monitoring as part of a combined monitoring approach.
MAC94	Amend Monitoring Chapter to include a new Indicator –Spatial distribution of housing developments	Amend the plan monitoring framework to include the new indicators in respect of spatial distribution of housing developments. <i>HS9/AP5</i>	No	No Implications for the SA but will inform SA monitoring as part of a combined monitoring approach.
MAC95	Amend Monitoring Chapter to include a new Indicator – The tenure of affordable housing completions	Amend the plan monitoring framework to include the new indicators in respect of the tenure of affordable housing completions set out in Hearing Statement for session 9. To ensure the Plan can be monitored effectively. <i>HS9/AP5</i>	No	No Implications for the SA but will inform SA monitoring as part of a combined monitoring approach.
MAC96	Appendix 2 - Supplementary Planning Guidance	Provide clarity about the production of SPGs. <i>HS1/AP13</i>	No.	Inserting an indicative timetable for preparation of Supplementary

Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
				Planning Guidance.
MAC97	Appendix 3 - Land Availability	Provide an up to date housing trajectory. <i>HS6/AP1 and HS6/AP5</i>	No.	The implications of the housing provision for the Plan have been assessed under other Policies of the Plan.
MAC98	Appendix 4 - Requirements for Housing Allocations and Large Windfall sites.	To provide a comprehensive appendix providing detailed information in respect of housing allocations and large windfall sites. <i>HS6/AP4</i>	No.	The implications of the housing provision for the Plan have been assessed under other Policies of the Plan.

Table 3.2 SA Screening Minor Modifications

Minor Change Number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MM1	Entire document	To improve the legibility of the Plan <i>HS1/AP2</i>	No	Presentational change.
MM2	Entire document	Update reference to Planning Policy Wales Edition 10. <i>HS1/AP1</i>	No	Cross reference update.
MM3	Objective E – Affordable Housing and Housing Growth	Consequential change arising from <i>HS7/AP10</i>	No	Cross reference update.
MM4	Footnotes 33-35 to Paras 4.2 to 4.10	Consequential change arising from <i>HS1/AP6</i>	No	Clarification of the Strategy
MM5	Footnotes 37-42 to Paragraphs 4.14 – 4.22	Consequential change arising from <i>HS1/AP6</i>	No	Clarification of the Strategy.

Minor Change Number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MM6	Issues for Tenby Footnote 44 to paragraph 4.27	Consequential change arising from <i>HS1/AP7</i>	No	Clarification of the Strategy.
MM7	Footnote 46 to paragraph 4.28	Consequential change arising from <i>HS1/AP7</i>	No	Clarification of the Strategy.
MM8	Footnote 52 to paragraph 4.35 Saundersfoot by 2031	Consequential change arising from <i>HS1/AP7</i>	No	Clarification of the Strategy.
MM9	Footnote 54 to paragraph 4.40 St Davids by 2031	Consequential change arising from <i>HS1/AP7</i>	No	Clarification of the Strategy.
MM10	Footnote 61 and 62 to Policy 7 criterion a)	Consequential change arising from <i>HS6/AP8</i>	No	Clarification of the Strategy.
MM11	Footnote 64 to Policy 7 Countryside criterion d)	Consequential change arising from <i>HS1/AP12</i>	No	Clarification of policy wording.
MM12	Footnotes 91 and 92	Consequential change arising from <i>HS1/AP6</i>	No	Clarification of the Strategy.
MM13	Paragraphs 4.154 and 4.156 Insert footnotes 1	Consequential change arising from <i>HS3/AP3</i>	No	Clarification of policy wording.

Minor Change Number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
	and 2			
MM14	Footnote 131	To provide clarity about the purpose of Shoreline Management Plans. HS1/AP5	No	Referencing.
MM15	Footnote 153	Consequential change arising from <i>HS6/AP1</i>	No	Clarification of strategy.
MM16	Footnote 155	Consequential change arising from <i>HS7/AP7</i>	No	Updated reference.
MM17	Footnotes 161, 162 and 163	Consequential change arising from <i>HS7/AP2</i>	No	Clarification of Policy wording.
MM18	Amend Table 9 – Percentage of Affordable Housing for Housing Submarket Area	Minor factual change arising from <i>HS7/AP8</i>	No	Typographical error.
MM19	Footnote 168	Consequential change arising from <i>HS5/AP10</i>	No	Clarification of Policy wording.

Minor Change Number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MM20	Policy 55 Town and District Shopping Centres criterion c)	Minor factual change arising from <i>HS5/AP9</i>	No	Cross reference added.

Table 3.3 SA Screening Maps

Maps Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
MMA1	Proposals Map Map Booklet MMA1 Local Nature Reserve	Amend the proposals map to include the local sites of nature conservation or geomorphic importance. <i>HS2/AP3</i>	No	Presentational change, policy protections remain unchanged.
MMA2	Proposals Map, Map Booklet MMA2.1 to 2.66	Amend the proposals map to include the local sites of nature conservation or geomorphic importance where formally designated. <i>HS2/AP3</i>	No	Presentational change, policy protections remain unchanged.
MMA3	Proposals Map Map Booklet MMA3.1 Rosemount Gardens	Include Rosemount Gardens and the Cemetery in Tenby as open spaces. Additions and alterations to the boundaries of The Glebe to ensure adequate protection of open space in Tenby.	No	Additional sites identified for protection. Policy remains unchanged.

Maps Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
	<p>MMAP 3.2 Tenby Cemetery</p> <p>MMAP 3.3 The Glebe</p>	<p><i>HS2/AP8</i></p>		
MMAP4	<p>Proposals Map</p> <p>Map Booklet</p> <p>Maps MMAP 4.1 to MMAP 4.4</p> <p>Housing Commitment Sites</p>	<p>Amend Proposals Map to show housing commitments.</p> <p><i>HS6/AP7</i></p>	No	<p>Clarification of the housing land supply. Quantum of development remains unchanged.</p>
MMAP5	<p>Proposals Map</p> <p>Map Booklet</p> <p>Maps MMAP5.1 to MMAP 5.11 Affordable Housing</p>	<p>Add the Affordable Housing Zones to the proposals map to improve the clarity of the Plan.</p> <p><i>HS7/AP9</i></p>	No	<p>Presentational, affordable housing sub-market areas delineated on the map.</p>

Maps Matters Arising Change number	Plan/Map Booklet reference	Reason/Justification(Action Point Reference)	Detailed SA required? Yes/No	Reason
	Zones			

4.0 Detailed Assessment of Matters Arising Changes

- 4.1 Following on from the Sustainability Appraisal screening process carried out in Section 3 of this report, those Matters Arising Changes that have been 'screened in' require more detailed assessment. This done by assessing those changes to the Plan against the framework of Sustainability Appraisal Objectives.
- 4.2 A total of two Matters Arising Changes were identified as being substantive changes to the plan, which may change the likely significant effects that were previously identified for the plan.

Table 4.1 Sustainability Appraisal Key

++	There is a generally consistent strong positive association between the policy option and the Sustainability Objectives.
+	There is a weak or inconsistent, but generally positive association between the policy option and the Sustainability Objectives.
0	There is not a significant association between the policy option and the Sustainability Objectives, or the association is neutral (the combination +/- is used where it is believed a policy will have both positive and negative effects with regard to a particular Sustainability Objective).
-	There is a weak or inconsistent, but generally negative association between the policy option and the Sustainability Objectives.
--	There is a generally consistent strong negative association between the policy option and the Sustainability Objectives.
?	The association between the policy option and the Sustainability Objectives is uncertain, may be used in association with other symbols to indicate a degree of uncertainty in the conclusion

Table 4.2

Mac ref: MAC15		Policy/Section/Map: Policy/Section/Map: Policy 7(a) and footnotes 61and 62	
Proposed MAC: Deletion of Policy 7(a) and footnotes 61 and 62.			
No.	SA Objective	Score	Comments
1	Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	-?	The Policy still makes allowances for rural enterprise dwellings. Proposals for infilling and rounding off would however potentially provide one off financial gains for farmers.
2	Locate developments so as to minimise the demand for travel, especially by private car.	+	There may be a minor positive effect as the policy is more restrictive with regard to development in the countryside with infilling and rounding

			off removed.
3	Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	0	The change is unlikely to have implications for this SA Objective.
4	Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The change is unlikely to have implications for this SA Objective.
5	Increase the number of visitors using the National Park outside the peak visitor season.	0	The change is unlikely to have implications for this SA Objective.
6	Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The change is unlikely to have implications for this SA Objective.
7	Reduce factors contributing to climate change.	+	There may be a minor positive effect as the policy is more restrictive with regard to development in the countryside therefore reducing the need to travel.
8	Maximise the contribution of the limited opportunities for development to sustaining local communities.	-?	There may be negative effects against this SA Objective due to the loss of cross subsidy for affordable housing and other infrastructure that can be leveraged from market housing. However, these would be limited at this scale of development.
9	Encourage access for all to the National Park, reflecting the social mix of society.	0	The change is unlikely to have implications for this SA Objective.
10	Maintain the cultural distinctiveness of communities.	-?	May reduce opportunities for people to remain in the communities they have a connection to, with potential implications for culture and Welsh language.
11	The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0	The change is unlikely to have implications for this SA Objective.
12	Reduce the negative impacts of waste.	0	The change is unlikely to have implications for this SA Objective.
13	Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The change is unlikely to have implications for this SA Objective.

14	Maintain and enhance biodiversity both within and outside designated sites	0	The change is unlikely to have implications for this SA Objective.
15	Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The change is unlikely to have implications for this SA Objective.

Mac ref: MAC75	Policy/Section/Map: New Policy – Affordable Housing Exception Sites
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Proposed MAC: New Policy – Affordable Housing Exception Sites

Affordable Housing Exception Sites

Affordable housing sites within or adjoining the Plan's Centres will be permitted where it can be demonstrated that:

- a) The site is solely for affordable housing and there are clear and adequate mechanisms to ensure that the benefits of affordable housing will be secured for initial and subsequent occupiers; and
- b) A genuine need for affordable housing has been identified; and
- c) The site is of a size and scale that is commensurate with the defined need and is in keeping with the form and character of the Centre.

No.	SA Objective	Score	Comments
1	Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2	Locate developments so as to minimise the demand for travel, especially by private car.	+	The policy specifies that affordable housing exception sites be adjoining centres, which may reduce the need to travel.
3	Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	+	Criteria C of the policy specifies that the size and scale of any exception site development be of an appropriate size/scale and be in keeping with the form and character of the Centre is adjoins.
4	Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Providing affordable housing in locations adjacent to centres may increase the number of residents walking and cycling to work.
5	Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6	Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so as to contribute to these potential effects of climate change.

7	Reduce factors contributing to climate change.	-/+	Minor negative effects likely due to the energy demands during and post completion. Some mitigation will come from the application of sustainable design (Policy 30) and there may be opportunities to reduce the need to travel (see SA Objective 2).
8	Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The provision of affordable housing means households affordable for local people in perpetuity, which will help to sustain local services and facilities long term.
9	Encourage access for all to the National Park, reflecting the social mix of society.	+	The provision of affordable housing will increase the range of people (particularly in income terms) able to live in the National Park.
10	Maintain the cultural distinctiveness of communities.	+	The provision of affordable housing means households affordable for local people in perpetuity and may enable people to remain in the communities they have a connection to. Helping to sustain the cultural identity of the Centres of the National Park and preserve Welsh language.
11	The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Brownfield allocations in the centres may offer opportunities to recycle materials.
12	Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development.
13	Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	Affordable housing exception sites may help to maintain the 'critical mass' required to sustain community facilities in Centres in the National Park.
14	Maintain and enhance biodiversity both within and outside designated sites	0	Appropriate protection of biodiversity policies will ensure that sites are located to minimise the impacts on biodiversity, where possible.
15	Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

4.3 From the removal of criteria (a) from Policy 7 (Countryside) there is potential for some minor positive impacts with regards to emissions from private car use since this change restricts

development in the countryside. There is also potential for minor negative impacts but these are more uncertain since they concern the very limited ability for infill development to contribute to social and cultural aspects.

- 4.4 The new policy for affordable housing exception sites scores well against the SA objectives relating to landscape, communities and reducing the need to travel.
- 4.5 These two changes would not substantively change the quantum of development in the National Park as they deal with very specific development types. Infilling and round off developments are very small in nature and Affordable Housing Exception Sites are of infrequent occurrence. It is considered that there would be no overall impacts to the Sustainability Appraisal of the Replacement Local Development Plan.

5.0 Conclusions

- 5.1 This addendum highlights what effects the proposed Matters Arising Changes to the Local Development Plan as submitted for Examination are likely to have with regard to the Sustainability Appraisal. This document should be read alongside the Deposit Sustainability Appraisal of the Local Development Plan as submitted for Examination.
- 5.2 All Matters Arising Changes have been screened to determine if a new detailed appraisal is necessary. Detailed assessments of two policy changes have been carried out and were found to be of minimal impact.
- 5.3 Following the consideration of the updated appraisals, no implications on the overall Sustainability Appraisal of the Local Development Plan were identified.