

WALES NATIONAL DEVELOPMENT FRAMEWORK

Habitats Regulations Assessment

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Our first national development framework will when published be called '**Future Wales – The National Plan 2040**'. This assessment was prepared prior to publication and uses the name 'national development framework' and 'NDF' throughout. For clarification the references to the national development framework in this document are taken to mean **Future Wales – The National Plan 2040**.

VERSION CONTROL

Version	Date	Author	Checker	Approver	Changes
01	21/5/19	JW	LT	JD	First Draft
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Glossary

Glossary	
Adverse effect (on integrity)	A negative impact on the Natura 2000/ Ramsar site and/or its qualifying features which could result in a significant effect that undermines the Conservation Objectives of the site, and/or result in loss of ecological function.
Annex I habitats	A natural habitat listed under Annex I of the Habitats Directive for which Special Areas of Conservation can be selected.
Annex II species	A species under Annex II of the Habitats Directive for which Special Areas of Conservation can be selected.
Appropriate Assessment (AA)	A term used to describe Stage 2 of the Habitats Regulations Assessment process. An AA is required should it be determined that there is a risk that a plan or project may have an adverse significant effect on a Natura 2000/ Ramsar site, either alone or in-combination with other plans or projects.
Buffer zones	Impacts can extend well beyond the boundaries of Natura 2000/ Ramsar sites. The 'buffer zones' developed in consultation with Natural Resources Wales (NRW) for this HRA are defined as the areas around a Natura 2000/ Ramsar site where the potential for impacts are likely to be greatest (refer to Section 1.5).
Compensatory measures	Measures designed to ensure the coherence of the Natura 2000 network is protected where adverse effects of site integrity cannot be ruled out, and in the absence of alternative solutions, the plan or projects must proceed for Imperative Reasons of Overriding Public Interest (IROPI). They must be clearly distinguished from mitigation measures.
Conservation Objective	A statement of the nature conservation aspirations for a site, expressed in terms of the favourable condition that the species and/or habitats for which the site has been selected to attain.
European marine site	The parts of a Natura 2000/ Ramsar site which are marine areas.
Favourable conservation status (FCS)	A range of conditions for a natural habitat or species at which the sum of the influences acting upon that habitat or species are not adversely affecting its distribution, abundance, structure or function throughout the EU in the long term. The condition in which the habitat or species is capable of sustaining itself on a long-term basis.
Functionally-linked land	Species associated with a designated site are not confined to the boundaries of that location and will often use habitats outside the site to feed, roost and/or breed. Should this habitat be integral to the function of the designated site by being vital to the maintenance of the qualifying feature, this would be deemed to be 'functionally-linked land'. As such the HRA would need to take into account any potential effects on these habitats.
Habitat	The place in which a plant or animal lives.
Habitats Regulations Assessment (HRA)	The assessment of the impact on the integrity of the Natura 2000/ Ramsar site of the project or plan, either alone or in combination with other projects

Glossary	
	or plans, with respect to the site's structure and function and its conservation objectives.
Imperative Reasons of Overriding Public Interest	A part of the derogations tests in Article 6(4) of the Habitats Directive and Regulations 62 and 103 of the Habitats Regulations and Part 4 of stage 4 of the Habitats Regulations Assessment a situation which would allow plans or projects to take place that many adversely affect the integrity of a Natura 2000/ Ramsar site.
Likely Significant Effect (LSE)	A likely effect is one that cannot be ruled out on the basis of objective information. The test is a likelihood of and an effect, rather than the certainty of that effect occurring. i.e. there is a risk, or possibility of an effect being significant.
Mitigation measures	After avoidance, mitigation is an action or actions that may be applied to reduce or cancel the adverse effects of a plan or project on a Natura 2000/ Ramsar site.
Natura 2000 site	The European network of protected sites established under the Habitats and Birds Directives.
Pre-Assessed Areas	Areas identified by the Welsh Government as potential locations for future wind energy development (refer to Policy 17).
Qualifying features (of a site)	The habitats or species for which a site has been classified SPA or designated SAC or listed as a Ramsar site.
Ramsar site	Site designated under the 1971 Ramsar Convention as a wetland of international importance.
Special Area of Conservation (SAC)	Site designated under the Habitats Directive for their habitats and/or species of European importance (includes Primary Reasons/Qualifying Features - Annex I Habitats/Annex II Species).
Screening	A term used to describe Stage 1 of the Habitats Regulations Assessment process and identifies the potential for LSE on Natural 2000/ Ramsar sites.
Special Protection Area (SPA)	Site designated under the Conservation of Wild Birds Directive for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands (includes Article 4.1/4.2 birds).
Site of Special Scientific Interest (SSSI)	A national (UK) designation for sites considered as being of special interest due to fauna, flora, geological or physiographical features.
<p>The titles of the sites within this document reflect the JNCC lists and if a site has a bilingual title, only the English version is used in this report.</p> <p>JNCC Lists –</p> <p>SACs: https://sac.jncc.gov.uk/site/wales</p> <p>SPAs: https://jncc.gov.uk/our-work/list-of-spas/</p> <p>Ramsar sites: https://jncc.gov.uk/our-work/ramsar-sites/</p>	

Acronyms

Acronyms	
AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
CAP	Common Agricultural Policy
CEMP	Construction Environmental Management Plan
DCO	Development Consent Order
DNS	Developments of National Significance
EU	European Union
FCERM	Flood and Coastal Erosion Risk Management
FCS	Favourable conservation status
FRMP	Flood Risk Management Plan
GIS	Geographical Information System
HRA	Habitats Regulations Assessment
HRO	Harbour Revisions Order
IROPI	Imperative Reasons of Overriding Public Interest
LDP	Local Development Plan
LSE	Likely Significant Effect
NDF	National Development Framework
NFM	Natural Flood Management
NHCP	National Habitat Creation Programme
NPPF	National Planning Policy Framework
NRP	Natural Resources Policy
NRW	Natural Resources Wales
PA	Priority Area
PAA	Pre-Assessed Areas
PPW	Planning Policy Wales
RBMP	River Basin Management Plans
RMA	Risk Management Authority

Acronyms	
RSZ	Roost Sustenance Zone
SAC	Special Area of Conservation
SDP	Strategic Development Plan
SMP	Shoreline Management Plan
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TAN	Technical Advice Note
WFGA	Well-being of Future Generations Act, 2015
WIIP	Wales Infrastructure Investment Plan
WNMP	Welsh National Marine Plan

Executive Summary

This Report provides the Habitats Regulations Assessment (HRA) Screening and Appropriate Assessment (AA) of the Welsh Government's National Development Framework (NDF) (the draft NDF including proposed changes) dated September 2020. This Report summarises how the NDF has evolved from the Issues and Options stage through to the current NDF, along with the HRA work undertaken at each stage of the process. The Conservation of Habitats and Species Regulations 2017 stipulate that a HRA must be carried out on all Plans and Projects that have the potential to impact upon sites designated for supporting habitats or species of international importance, otherwise known as Natura 2000 or European designated sites. In the United Kingdom (UK), the requirements of the Habitats Regulations are also extended to consider the effects on Ramsar sites (listed under the Ramsar Convention on Wetlands of International Importance). The presence of Natura 2000/Ramsar sites within Wales, and the potential impacts that could arise as a result of implementation of the NDF, requires that assessment under the Habitats Regulations is carried out.

Screening

The screening stage has provided a high-level assessment to determine whether the NDF could possibly lead to Likely Significant Effects (LSE) on Natura 2000/ Ramsar sites. The purpose of this was to eliminate those elements of the NDF from the assessment which very clearly would not affect designated sites in order to focus on those policies where there was potential for effects or uncertainty about potential effects. Chapters 1 and 2 of the NDF have been screened out as they contain introductory text and contextual information which would not lead to any effects on Natura 2000/ Ramsar sites. Chapter 3 comprises the Outcomes of the NDF. Although all of the outcomes have the potential to lead to change, as the policies are the mechanism through which the outcomes will be achieved, assessment of the policies themselves (which contain more detailed information) was more appropriate. Chapter 3 has therefore also been screened out of further assessment. Of the 36 policies set out within Chapters 4 and 5 of the NDF, 12 have been screened out from further Appropriate Assessment since they either would not lead directly to change, or if they did, any change would be of such small scale that no LSE on Natura 2000/ Ramsar sites could occur either alone or in-combination. The remaining 24 policies were considered to have the potential to direct future development such that there could be implications for Natura 2000/ Ramsar sites. These policies were therefore screened in for further Appropriate Assessment alone and in-combination.

Appropriate Assessment

For projects, full details of the proposals are required to determine the mitigation measures required before a meaningful conclusion can be drawn as to whether a project will have no LSE, or no adverse effect on integrity. This is not possible for plans, especially high-level plans such as the NDF, which by definition are strategic in nature. High-tier strategic plans set the overall policy framework which lower-tier plans and projects must adhere to. In most cases the specific details of development provided for within a plan will not be available until a later date, after it has been adopted. In the case of the NDF, this will be through Strategic Development Plans, Local Development Plans and other strategic planning documents and projects which come forward during the plan period. For the NDF, there are a number of policies with a spatial element, for these, the Natura 2000/Ramsar sites that could be affected as a result of the policy are identified (where possible) with examples of the types of impacts that could occur. Since no specific development allocations or proposals are identified in the NDF, it is not possible at this high level to identify all impacts associated with policy implementation; however, the Appropriate Assessment process has determined the types of impacts which are most likely to be encountered and identified measures for each of the policies which would avoid/ mitigate for such types of impacts. These measures must be adhered to by Local Planning Authorities, Strategic Planning Panels and developers when implementing the policies to ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites. The Appropriate Assessment concluded that none of the policies in the NDF were considered to be actively directing development in such a location or manner that potential impacts arising from projects emerging under the policies (or lower-tier plans which will identify development opportunities for allocation) could not be avoided or mitigated at the lower-tier plan or project level.

In-combination effects

The in-combination assessment at this high level is necessarily limited, and therefore in-combination effects cannot be completely ruled out. However, given that all plans and projects with the potential to impact Natura 2000/ Ramsar sites are required to comply with the Conservation of Habitats and Species Regulations (2017), Planning Policy Wales (PPW) 10 and Technical Advice Note (TAN) 5: Nature Conservation and Planning as a matter of law, any potential in-combination effects would be identified and appropriate mitigation developed at subsequent lower-tier stages of the implementation of the NDF. Compliance with PPW10, TAN5 and the avoidance/mitigation measures set out against each of the policies within the NDF will ensure no adverse in-combination effects on Natura 2000/ Ramsar sites. The Welsh Government would not support any lower-tier plans or projects, associated with policies within the NDF, where adverse in-combination effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. The in-combination assessment therefore concludes that (assuming the avoidance/ mitigation measures set out within this HRA are implemented), there would be no adverse in-combination impacts on the integrity of any Natura 2000/ Ramsar sites as a result of implementation of the policies set out with the NDF.

Overall Conclusion

Whilst this HRA has made it clear that it is difficult at this very strategic stage of the development planning process in Wales to be clear about how Natura 2000/ Ramsar sites may or may not be affected by strategic policy decisions, it is important to note that the potential implications for Natura 2000/ Ramsar sites have been considered throughout the development of the Plan, such that early avoidance of the issues (and/or reduction of risk) has been a key element of the process when compiling the policies within the NDF. Firstly, it is important to note the legal requirement for lower-tier plans and projects with the potential to impact Natura 2000/ Ramsar sites (through the Habitats Regulations (2017), PPW10 and TAN5) to undertake HRA. Secondly, table 7 of the Appropriate Assessment sets out the types of impacts which could occur through implementation of the policies and identifies avoidance/mitigation measures which must be adhered to when producing lower-tier plans and projects to ensure no adverse impacts on Natura 2000/ Ramsar sites. Together, these two factors provide sufficient safeguarding to be able to confirm that no adverse effects on integrity are anticipated as a result of implementing the policies within the NDF (alone or in-combination).

1 Introduction

1.1 Purpose

This Report provides the Habitats Regulations Assessment (HRA) Screening and Appropriate Assessment (AA) of the Welsh Government's National Development Framework (NDF) (draft NDF including proposed changes) dated September 2020. This Report summarises how the draft NDF has evolved from the Issues and Options stage through to the current NDF, along with the HRA work undertaken at each stage of the process.

This Report comprises the Screening of the policies set out in the NDF followed by the AA of those policies where LSE on Natura 2000/ Ramsar sites could not be screened out.

1.2 The Habitats Regulations Assessment Process

The Conservation of Habitats and Species Regulations 2017 (as amended, hereafter referred to as the 'Habitats Regulations') stipulate that a HRA must be carried out on all Plans and Projects that have the potential to impact upon sites designated for supporting habitats or species of international importance, otherwise known as Natura 2000 or European designated sites. In the UK, the requirements of the Habitats Regulations are also extended to consider the effects on Ramsar sites (listed under the Ramsar Convention on Wetlands of International Importance). The presence of Natura 2000/Ramsar sites within Wales, and the potential impacts that could arise as a result of implementation of the NDF, requires that assessment under the Habitats Regulations is carried out.

In relation to Brexit, note that from Exit day (31st January 2020) until Implementation Period Completion day (31st December 2020), the Conservation of Habitats and Species Regulations 2017 will remain in force without any of the amendments relating to Brexit made by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulation 2019. As a result of provisions in the European Union (Withdrawal Agreement) Act 2020 these Brexit-related changes to the Habitats Regulations are suspended until Implementation Period Completion day. Therefore, for the purposes of this assessment, the 2017 Regulations will be used which incorporates all current amendments that have been made for non-Brexit reasons.

What is Habitats Regulations Assessment?

Under Article 6 of the Habitats Directive (and Regulation 105 of the Habitats Regulations), an assessment is required where a plan may give rise to LSEs upon a Natura 2000 site. Natura 2000 sites include Special Areas of Conservation (SAC) (including 'candidate' SACs) and Special Protection Areas (SPA) (including 'proposed' SPAs). In the UK, it is a requirement for Ramsar sites to be included within the assessment:

- SACs are designated under the Habitats Directive for their habitats and/or species of European importance (includes Primary Reasons/Qualifying Features - Annex I Habitats/Annex II Species).
- SPAs are designated under the Conservation of Wild Birds Directive for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands (includes Article 4.1/4.2 birds).
- Ramsar sites are designated under the Ramsar Convention for their internationally important wetlands (includes Criteria).

HRA can be defined as:

'The consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in-combination with other projects or plans, with respect to the site's structure and function and its conservation objectives'

Where:

- Integrity is *'the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified'* – therefore this goes beyond minor effects;

- Assessment of the implications for the site is made in view of its conservation objectives (extent/condition of habitats, size/status of populations - set out in Core Management Plans, Prioritised Improvement Plans, etc.);
- An effect is significant if it would 'undermine the conservation objectives' of the site (Waddenzee Judgement¹) - this represents a proxy for an effect on the integrity of a site.

It is possible to consent a plan that would have significant effects, but under Article 6(4) (of the EC Habitats Directive), if you are likely to have an adverse effect on the integrity of a Natura 2000/ Ramsar site, then it must adhere to the following (as per *Managing Natura 2000 sites - The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC - November 2018*):

- the alternative put forward for approval is the least damaging for the integrity of the Natura 2000 site(s) and that no other feasible alternative exists that would not adversely affect the integrity of the site(s);
- there are imperative reasons of overriding public interest; and
- all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected are taken.

Being an exception to Article 6(3), this provision must be interpreted strictly, and can only be applied to circumstances where all the conditions required by the Directive, listed above, are fully satisfied.

Legislation and Guidance

This HRA is being made in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017, as amended. In doing so, this HRA Report has drawn upon the following guidance:

- European Commission, Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC.
- European Commission, Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC.
- Department for Communities and Local Government (2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.
- David Tyldesley and Associates (DTA) Publications Limited, The Habitats Regulations Assessment Handbook.
- People Over Wind and Sweetman v Coillte Teoranta – European Court of Justice, Case C323/17.

1.3 The National Development Framework Process

The NDF has been developed over a 4-year period incorporating multiple consultation exercises with a range of stakeholders from across the whole of Wales. The NDF is a spatial plan which sets a direction for where investments in infrastructure and development should be focussed, such that they contribute to the broader ambitions of the Welsh Government and to the well-being of communities. The aim of the NDF is to provide a spatial context for the delivery of development and national planning policy in Wales over the next 20 years. The NDF is therefore a fundamental part of the planning system in Wales. More information on the NDF and the planning system is available on the [Welsh Government website](#).

The first stage of the NDF was to collect evidence, engage and involve stakeholders and set out draft objectives for future development in Wales, along with a series of spatial options. This culminated in the preparation of a detailed consultation document. Five spatial options were identified, each with a different focus as to the future direction of development plans, programmes and strategies within Wales. A Rules of Thumb document (Appended to the HRA Report for the Draft NDF, July 2019) was produced by Arcadis to provide advice to the Welsh Government with regards to the requirements of the HRA and how this should influence initial drafting of the NDF. (This document can be viewed at: <https://gov.wales/draft-national-development-framework>).

The five spatial options were:

¹ EC Case C-127/02 *Reference for a Preliminary Ruling 'Waddenzee'* September 2004

- Community Focus.
- Market Driven Focus.
- Decarbonisation Focus.
- Natural Resource Resilience Focus.
- Do Not Prepare the NDF.

The NDF Preferred Option then set out how the land-use planning system would support the long-term aims of the Well-being of Future Generations Act, 2015 (WFGA, 2015) as well as other government policies. The NDF Preferred Option had two key roles: to provide spatial direction for growth and new infrastructure and identify areas of change, protection, enhancement and mitigation; and to establish the direction for strategic spatial policy. It was developed around five themes:

- Placemaking;
- Distinctive and Natural Places;
- Productive and Enterprising Places;
- Active and Social Places; and
- Wales’s Regions.

The draft NDF comprised 33 policies covering a range of topics which set the direction for development in Wales from 2020 to 2040. HRA Screening and Appropriate Assessment were carried out on this document and the draft NDF and associated HRA documents (July 2019) were subsequently put out to public consultation in Autumn 2019. (This document can be viewed at: <https://gov.wales/draft-national-development-framework>).

The Welsh Government received 1,088 responses to the public consultation process, all of which have been read, analysed and considered. The consultation response report [<https://gov.wales/draft-national-development-framework>] sets out further details on this. The public consultation highlighted a number of areas (such as the renewable energy policies) where revisions to the NDF would be required. The NDF was subsequently updated and the current document, comprising 36 policies, was produced in August 2020. This HRA Report (updated August 2020) takes account of the consultation responses as well as changes to the NDF itself.

1.4 Approach to HRA of the NDF

Table 1 summarises the stages of the NDF and corresponding HRA inputs that have been provided.

Table 1: NDF and HRA Input

NDF Stage	HRA Input
Evidence Gathering	A Rules of Thumb (August 2017) document was developed which provided advice to Welsh Government with regards to the requirements of the HRA and how this should influence initial drafting of the NDF. Details of the designated sites within Wales and the types of potential impact pathways were identified within the document. A Geographical Information System (GIS) file was created to check potential development locations for the presence of designated sites and the types of development that could affect such sites. The Rules of Thumb document was designed as a guide to assist in development of objectives, policy and strategic locations.
Issues, Options and Preferred Option	Preliminary HRA Screening Report (April 2018) – This document provided a high-level review of the draft NDF Objectives, Issues and Options and Preferred Option. The Screening Report included recommendations to inform the on-going NDF policy development.

NDF Stage	HRA Input
Draft NDF	HRA Report for the Draft NDF (July 2019) – This Report incorporated the In-combination Assessment, together with the Screening Assessment and an Appropriate Assessment of the draft policies.
Current version of the NDF	HRA Report of the current NDF (August 2020) - Following a public consultation period in 2019, this HRA Report takes account of consultation comments and subsequent updates made to the NDF for publication and adoption of the plan.

The first stage of the HRA for the NDF project included a period of evidence-gathering and background research to compile details of the Natura 2000/ Ramsar sites that would need to be referred to throughout the process. During this stage, a GIS tool and 'Rules of Thumb' document to supplement the information provided in the GIS were created. The Rules of Thumb document was appended to the HRA Report for the Draft NDF (July, 2019) [Note that this document was produced at an early stage of the development of the NDF (in August 2017), and therefore some of the information provided will have been superseded as the Plan evolved and should not be used by practitioners when developing lower-tier plans].

Following the evidence-gathering period, a set of draft NDF objectives and spatial options was developed; this included four draft alternative spatial options and a benchmark option, as well as the first draft of the objectives. A draft Preferred Option for the NDF (including the preferred Spatial Strategy) was then produced, and a preliminary HRA Screening Report was prepared assessing the implications for Natura 2000/ Ramsar sites. The Preferred Option did not include any specific spatial policies identifying potential development opportunities or locations. Without specific details, it was not possible to confirm whether or not the objectives or spatial strategy directions would have a LSE upon Natura 2000 and Ramsar sites. The objectives and spatial direction of the NDF policies were therefore reviewed to identify whether there could be any *potential* implications for Natura 2000 and Ramsar sites. Identifying such potential implications enabled the Welsh Government Planning Team to take account of them as the policies within the draft NDF were developed.

A draft NDF which included 33 policies was developed in 2018. This version of the NDF comprising 36 policies was produced in March 2019. The NDF is the highest tier of development plan in Wales and is focussed on issues and challenges at a national scale. It does not identify specific projects nor allocate development to all parts of Wales, nor does it include policies on all land uses. It is, instead, a framework that will be supplemented and supported by Strategic Development Plans (SDPs) at a regional level and Local Development Plans (LDPs) at local authority level. It is these 'lower-tier' plans which will provide more detail on specific locations and types of infrastructure and development.

In accordance with the DTA guidance, in order to ascertain that there would be no adverse effect on the integrity of a Natura 2000/ Ramsar site, a plan-making body may only rely on mitigation measures in a lower-tier plan or project level if the following three criteria are all met:

- *The higher-level plan assessment cannot reasonably predict any effect on a European site in a meaningful way; whereas*
- *The lower-tier plan or project level, which will identify more precisely the nature, timing, duration, scale or location of development, and thus its potential effects, will have the necessary flexibility over the exact nature, timing, duration, scale and location of the proposal to enable an adverse effect on site integrity to be avoided; and*
- *The HRA of the lower-tier plan or project is required as a matter of law or Government policy.*

Given the nature of the NDF, it is therefore the lower-tier plans and projects which will include sufficient detail to allow for a meaningful assessment of the potential impacts that such development could have on Natura 2000/Ramsar sites. The HRA at this level of the planning hierarchy is therefore necessarily high-level and precautionary.

The Screening stage identifies those elements of the Plan that are considered could lead to development that could have the *potential* for LSEs upon Natura 2000/Ramsar sites. The Rules of Thumb document helped to

focus the screening assessment onto those types of developments which could affect qualifying habitats and species of Natura 2000/ Ramsar sites (see also 1.5, below, for a summary of this assessment process). The 'screened in' policies were then taken through to AA, which identified policy-specific impacts and associated avoidance/ mitigation measures; this was aimed at flagging up the particular issues that would need addressing in HRAs of lower-tier plans and projects.

As stated in the third bullet point above, all lower-tier plans and projects that have the potential to impact upon Natura 2000/Ramsar sites (regardless of their proximity to these sites) are required to comply with the Conservation of Habitats and Species Regulations (2017) as a matter of law. Therefore, irrespective of the policy wording included within the NDF, statutory HRA of lower tier plans/ projects would be required. Planning Policy Wales 10 (PPW) and Technical Advice Note (TAN) 5 also place a requirement on planners and developers to undertake a HRA if potential impacts on Natura 2000/Ramsar sites have been identified. PPW 10 states that:

'Statutory designation of a site does not necessarily prohibit development, but proposals must be carefully assessed to ensure that effect on those nature conservation interests which the designation is intended to protect are clearly understood; development should be refused where there are adverse impacts on the features for which a site has been designated. International and national responsibilities and obligations for conservation should be fully met, and, consistent with the objectives of the designation, statutorily designated sites protected from damage and deterioration, with their important features conserved and enhanced by appropriate management. Further information on Habitats Regulations Assessment is contained in TAN 5: Nature Conservation and Planning.'

It is nevertheless important that this HRA of the higher-tier NDF identifies the types of potential impacts which could arise from policy implementation, and how these could be avoided/mitigated at a later stage (i.e. 'flagging up' potential issues at an early stage), as well as providing the high-level policy reassurance that future SDPs, LDPs and developers will follow the necessary process to identify and assess potential implications for Natura 2000/Ramsar sites when allocating land for development. The subsequent LDP-level, or even project-level HRAs will need to take into consideration the potential impacts identified in this HRA to guide their policy development and ensure that mitigation measures can be delivered where potential for adverse effects are identified. Cross-reference to this HRA and the proposed avoidance/ mitigation (set out in Section 4) is outlined in Chapter 1 of the NDF (including a link to the avoidance/ mitigation section).

It is important to note that this is how the iterative HRA process ensures that plans and projects cannot be consented or implemented without first ensuring that they would not have an adverse effect upon the integrity of the European network of Natura 2000 and Ramsar sites. The next section describes how these potential effects are assessed.

1.5 Assessing impacts on Natura 2000/ Ramsar sites

The assessment of the implications of the various policies set out in the NDF for the Natura 2000/Ramsar sites is based upon a consideration not only of the qualifying habitats and species *within* each Natura 2000/Ramsar site but also the distance beyond each site's boundaries over which significant or adverse impacts could still, potentially, be experienced. The types of potential impact pathways which could result from implementation of the NDF policies are summarised as follows:

- Land-take within a Natura 2000/ Ramsar site (i.e. direct habitat loss);
- Habitat degradation within a Natura 2000/ Ramsar site (i.e. indirect habitat loss);
- Effects as a result of deterioration of air quality;
- Effects on water quality or quantity;
- Risk of disturbance/ displacement to species that are qualifying features of a Natura 2000/ Ramsar site;
- Risk of mortality (to mobile species); and
- Severance and fragmentation creating barriers to movement.

Given that a number of these impacts can extend well beyond the boundaries of Natura 2000/Ramsar sites, 'buffer zones' around each Natura 2000/Ramsar site have been developed. The buffer zones have been

agreed in consultation with Natural Resources Wales (NRW) and are defined as the areas around a Natura 2000/Ramsar site where the potential for impacts are likely to be greatest. It should be noted that the buffer distances (set out below) have generally not been developed on the basis of a comprehensive analysis of the literature (other than for chough) but are instead relatively standard distances adopted by the ecological consultancy industry. We have adopted these distances on the basis of our own professional judgement and adopting the precautionary principle. They will be quite precautionary with regard to certain types of NDF development (e.g. wind farms, mobile telecommunications infrastructure, etc.) since although the potential does still exist for birds from nearby SPAs/Ramsar sites to be displaced from feeding grounds by such development, the impact is likely to be less than that associated with other types of development (such as wind farms and the potential for collision with turbines) where significant adverse effects on populations are more likely. Clearly, this detailed consideration of buffers is only possible where there is an obvious spatial element to a policy (e.g. Policy 17), but the principles can nevertheless also be applied more generally when considering the potential for policies to lead to impacts. An illustration of the application of buffers is provided in the assessment of the renewable and low carbon energy policy (Policy 17), refer to Appendix B.

For the purposes of this HRA, the following buffer zones have been applied:

- SACs and Ramsar sites are generally habitat-based, impacts (beyond the obvious direct land-take) are primarily to do with hydrological effects on wetland habitat and potential effects of air quality changes, such as nitrogen deposition. Although the latter can occur over greater distances, especially where the habitat is particularly sensitive to nutrient enrichment, significant effects (e.g. such that individual plants are adversely affected physiologically or that plant communities are altered by increased competitiveness of the more robust species present) are extremely unlikely over greater distances, owing to the dispersal of emissions in the air. **The buffer zone for Ramsar sites and for SACs where bats (and birds) are not a qualifying feature has therefore been set at 5km.**
- Whilst lesser horseshoe bats can fly distances greater than 10km to access foraging areas, the vast majority of the feeding habitat necessary to resource a roost (i.e. the 'roost sustenance zone (RSZ)') is much closer than this. Although bats can also fly large distances from summer roosts to hibernation sites and between maternity roosts, the risks associated with exposure to any form of development (e.g. wind farms, road schemes, etc.) are much lower given that these journeys tend to be taken less frequently than nightly foraging routes in the RSZs. **The buffer zone for SACs where lesser horseshoe bats are a qualifying feature has therefore been set at 10km.** The SACs which this would be relevant to are as follows:
 - Pembrokeshire Bat Sites and Bosherton Lake SAC
 - Glynllifon SAC
 - Meirionnydd Oakwoods and Bat Sites SAC
 - Gwydyr Forest Mines SAC
 - Wye Valley Woodlands SAC
 - Wye Valley and Forest of Dean Bat Sites SAC
 - Usk Bat Sites SAC
 - Tanat and Vyrnwy Bat Sites SAC
- Following consultation with NRW in 2019, it was determined that a separate buffer zone for greater horseshoe and barbastelle bats should be included. Whilst the 10 km buffer is suitable for lesser horseshoe bats, it is considered insufficient to reduce risk to greater horseshoe and barbastelle bat SAC populations given these species regularly travel significant distances (the RSZ for barbastelles is at least 6 km). Many SAC bat populations are also critically supported by surrounding habitats and a range of 'annex' roosts that are not contained within the designation. As knowledge of these areas is deficient, and with due regard for greater horseshoe bat and barbastelle bat ecology, taking a precautionary approach, **the buffer zone for SACs where barbastelle and greater horseshoe bats are a qualifying feature has been set at 20km.** The SACs where this is relevant are as follows:
 - Limestone Coast of South West Wales SAC (greater horseshoe bat)

- Pembrokeshire Bat Sites and Bosherton Lake SAC (greater horseshoe bat)
 - North Pembrokeshire Woodlands SAC (barbastelle bat)
 - Wye Valley and Forest of Dean Bat Sites SAC (greater horseshoe bat)
- Certain bird species associated with SPAs and Ramsar sites (e.g. raptors, wildfowl & waders etc.) tend to readily fly greater distances as part of their foraging behaviour. Thus, birds associated with a designated site are certainly not confined to the boundaries of that location and will often fly some distance from it to feed, roost or breed. This is the basis of the concept of 'functionally-linked land' and the fact that HRAs of SPAs/ Ramsar sites need to take into account the fact that birds from the designated population will often spend time outside the boundaries of the designated area. A number of water birds are migratory, and therefore fly much greater distances between their breeding and over-wintering grounds. Whilst it is clearly not practical to account for these distances in establishing buffer zones, it is nevertheless important to consider the potential implications of NDF-facilitated development on Natura 2000/ Ramsar sites even if they are located some distance away (up to 20 km), given the potential for mobile qualifying species. This is because even if a proposal site is many kilometres from a SPA/ Ramsar site boundary, it could still be located directly on the migration flight path for a SPA/ Ramsar site species. That said, migration is often carried out at height, so the risks are likely to be small (other than for airport expansion), but this potential impact will at least need to be considered at screening. Whilst this is unlikely to be a significant issue for certain types of development being promoted by the NDF, such as solar farms (although the presence of such features could displace birds from areas they would previously have used), there certainly is a risk of mortality, disturbance and other impacts (e.g. associated with wind farms, roads, tourism, dog-walking from new residential development etc.), even if they are some distance from the border of an Natura 2000/ Ramsar site supporting birds. **The buffer zone for SPAs (and for Ramsar sites where the qualifying features include bird species) has therefore been set at 20km.**
 - A specific buffer zone has also been set for those SPAs where chough is a qualifying feature. Following consultation with NRW in 2018, it was agreed that the particular status of this species in Wales (the Welsh SPA network supports approximately 30% of the whole of the UK's population), and the fact that juvenile birds are known to disperse over particularly large distances, meant that a larger buffer was required. Evidence suggests that 98% of males disperse up to 35km from the natal site, whilst approximately 82% of females disperse up to 40km. **The buffer zone for SPAs where the qualifying features include chough has therefore been set at 40km.** These SPAs where this would be relevant are as follows:
 - Castlemartin Coast (breeding and wintering),
 - Bird's Rock (breeding and wintering),
 - Aberdaron Coast and Bardsey Island (breeding and wintering),
 - Holy Island Coast (breeding and wintering),
 - Mynydd Cilan, Trwyn y Wylfa ac Ynysoedd Sant Tudwal (breeding and wintering),
 - Ramsey and St David's Peninsula Coast (breeding and wintering),
 - Skomer, Skokholm and the Seas off Pembrokeshire (breeding).

When considering potential impacts on designated habitats and species, consideration has also been given to riverine habitats (and associated species), mobile species, 'typical species' and functionally linked land, as set out below:

- **Riverine habitats (and associated species)** – Whilst a buffer of 5km has been set for SAC habitats, potential impacts (such as effects on water quality and mobilisation of sediment) on riverine SACs could extend further than this (for example, into undesignated tributaries). Riverine SACs which comprise mobile species, such as migratory fish (shad, lamprey, salmon, sea trout and eel) and otter should also be considered beyond the 5km buffer. Where otters are a primary reason for site selection, SACs only support a proportion of the habitat utilised by this species. Whilst it is recognised that SACs encompass important areas of otter habitat, this species is wide-ranging and will use feeding and breeding habitat outside of the SAC. **Therefore, wherever a riverine SAC is downstream of a proposed development, potential impacts should be assessed outside of the 5km buffer (i.e.**

where potential developments are taking place upstream of riverine SACs, watercourses throughout the catchment which includes the SAC must be considered).

- **Mobile species** – includes those qualifying features (not already discussed above), which require consideration beyond Natura 2000/ Ramsar site boundaries because they are migratory, or forage or roost etc. 'off-site', or whose populations require movement and mixing across fragmented sites (at a meta-population scale). For example, marsh fritillary butterflies are not confined to SACs and are vulnerable to development (particularly in the Valleys and in Carmarthenshire in Wales). The key to marsh fritillary conservation is the availability of more than 50ha of suitable habitat in good condition within a well-connected landscape, which thereby supports functioning meta-populations. **Therefore, Natura 2000/ Ramsar sites whose qualifying features include mobile species, which may be affected by policies within the NDF (irrespective of the location of the plan's proposals or whether the species would be in or out of the site when they might be affected), will be considered in the assessment. Species (not already discussed above) which fall into this category in Wales include:**
 - **Marsh fritillary butterfly**
 - **Great crested newt**
 - **Sea mammals**

- **Typical species** – includes those that are not qualifying features of the Natura 2000/ Ramsar site in their own right, but which are the typical species of a habitat which is a qualifying feature, and which are often referred to in the Conservation Objectives. **At the strategic level of the NDF HRA it is not possible to consider them, but the potential need for them to be considered in future project-level HRAs has been highlighted, refer to Section 4.**

- **Functionally linked land** - refers to the role or 'function' that land or sea beyond the boundary of a Natura 2000/ Ramsar site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified (typically this includes waterbirds associated with SPAs as described in relation to the buffer set for birds in bullet point 4 above, but is also applicable to other species such as newts and bats). Such land is therefore 'linked' to the Natura 2000/ Ramsar site because it performs an important role in maintaining or restoring the population of qualifying species at favourable conservation status. Land which has been identified as functionally linked to a Natura 2000/ Ramsar site holds the same level of protection as the Natura 2000/ Ramsar site itself, and therefore any adverse effects on such land would need to be mitigated, as appropriate. Functionally linked land may fall within buffers, but it may also lie outside. **At the strategic level of the NDF HRA it is not possible to identify specific areas of functionally linked land, but the potential need to consider it in future project-level HRAs has been highlighted, where relevant, to ensure no adverse effects on site integrity.**

These buffer zones and consideration of mobile species, typical species and functionally linked land are very important with regard to future consideration of development across Wales. Essentially, these should aid the HRA Screening and Appropriate Assessment process for subsequent development proposals. This does not mean that an Appropriate Assessment will automatically be required if a site lies within a buffer, but it does mean that a HRA Screening Report will need to be prepared, setting out a detailed consideration of the impact pathways between the proposed development and any Natura 2000/ Ramsar site qualifying habitats and/or species, and thus the potential for LSE.

2 Screening

2.1 Screening Approach

The screening stage has provided a high-level assessment to determine whether the NDF could possibly lead to LSEs on Natura 2000/ Ramsar sites. The purpose of this was to eliminate those elements of the NDF from the assessment which very clearly would not affect designated sites in order to focus on those policies where there was potential for effects or uncertainty about potential effects. When identifying the elements of the NDF that could potentially affect Natura 2000/ Ramsar sites, it was important to focus upon those that would have the greatest likelihood of impacting the sites. Note that the NDF is intended to be read as a single document rather than a series of separate policies and has been assessed as such. Proposals in one area of the Plan may mitigate potentially damaging activities promoted in another area and should be understood in the wider context of the intended outcomes of the Plan.

2.2 Screening Assessment

The first two chapters of the NDF include introductory text and provide contextual information regarding the development of the Plan. This part of the NDF is factual and does not in itself lead to change or development. These sections cannot conceivably have any effects on Natura 2000/ Ramsar sites and are therefore screened out of further assessment.

Table 2: Screening of Chapters 1 and 2

Section of the Plan	Screening justification	Screening conclusion
Chapter 1 – Introduction	Introductory text	Screened out
Chapter 2 - Wales: An Overview	Contextual information	Screened out

Chapter 3 Setting and Achieving Our Ambitions, includes the NDF Outcomes. A review of the NDF objectives was undertaken at the Issues and Options stage in 2018. Following the iterative process of the plan development, these objectives have since been updated and are now referred to as 'Outcomes'. These outcomes have been re-assessed below, refer to Table 4. Chapters 4 and 5 set out the strategic policies within the NDF. These are the mechanism through which the Outcomes will be achieved and are assessed in Table 5 below. [Note that how the policies link to each of the Outcomes are listed in 'The relationship between the NDF's policies and the 'Outcomes' it sets out to achieve' Table on the last page of the NDF.] Policies taken through to Appropriate Assessment have been highlighted in grey in Table 5.

The screening assessment follows guidance set out in Part F of the DTA HRA Guidance. Each of the outcomes and policies within the NDF have been reviewed against the following list of screening categories (refer to Table 3). These assessment categories have been specifically designed to identify the different types of policy that could be implemented through high-level planning documents, and to determine whether future actions arising from a policy could lead to development which could in turn affect Natura 2000/Ramsar sites.

Table 3: Screening Assessment Categories (Adapted from Section F.6.3 of the DTA HRA Handbook)

Category	Description
Category A:	General statements of policy/general aspirations (screen out). Policies which are no more than general statements of policy or general political aspirations should be screened out because they cannot have a significant effect on a site.
Category B:	Policies listing general criteria for testing the acceptability/sustainability of proposals (screen out). These general policies cannot have any effect on a European site and should be screened out.

Category	Description
Category C:	Proposal referred to but not proposed by the plan (screen out). Screen out any references to specific proposals for projects, such as those which are identified, for example, in higher policy frameworks such as National Policy Statements, relating perhaps to nationally significant infrastructure projects. These will be assessed by the Secretary of State or Welsh Ministers.
Category D:	General plan-wide environmental protection/site safeguarding/ threshold policies (screen out). These are policies, the obvious purpose of which is to protect the natural environment, including biodiversity, and/or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any adverse effect on a European Site. They can be screened out because the implementation of the policies is likely to protect rather than adversely affect European sites and would not undermine their conservation objectives.
Category E:	Policies or proposals that steer change in such a way as to protect European sites from adverse effects (screen out). These types of policies or proposals will have the effect of steering change away from European sites whose qualifying features may be affected by the change, and they can therefore be screened out.
Category F:	Policies or proposals that cannot lead to development or other change (screen out). Policies that do not themselves lead to development or other change, for example, because they relate to design or other qualitative criteria for development, such as materials for new development. They do not trigger any development or other changes that could affect a European site and can be screened out.
Category G:	Policies or proposals that could not have any conceivable adverse effect on a site (screen out). Policies which make provision for change, but which could have no conceivable effect on a European site, because there is no causal connection or link between them and the qualifying features of any European site and can therefore be screened out.
Category H:	Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects) (screen out). Policies or proposals which make provision for change, but which could have no significant effect on a European site, either alone or in combination with other aspects of the same plan, or in-combination with other plans or projects, and can therefore be screened out.
Category I:	Policies or proposals which may have a significant effect on a site alone (screen in). Policies or proposals which are likely to have a significant effect on a European site alone should be screened in.
Category J:	Policies or proposals unlikely to have a significant effect alone. These aspects of the plan would have some effect on a site, but the effect would not be likely to be significant; so, they must be checked for in-combination (cumulative) effects. They will then be re-categorised as either Category K (no significant effect in-combination) or Category L (likely to have a significant effect in-combination).
Category K:	Policies or proposals unlikely to have a significant effect either alone or in-combination (screen out after the in-combination test). Those aspects of the plan with no potential for likely significant effect alone or in-combination can be ruled out after the in-combination assessment.
Category L:	Policies or proposals which might be likely to have a significant effect in-combination (screen in after the in-combination test). Those aspects of the plan which would not have a significant effect alone but has been identified as having the potential to impact on Natura 2000/ Ramsar sites in-combination with other plans or projects.
Category M:	Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on European sites (screen in). Policies or proposals which have been included in the plan with the intention of avoiding or reducing effects on specific European site(s) whose qualifying features may otherwise be affected by the plan being implemented.

Table 4: Screening Assessment of the NDF Outcomes

Outcomes	Screening justification	Screening Decision
A Wales where people live.....		
1 – And work in connected, inclusive and healthy places	This is a general policy statement and would not lead to any effects on Natura 2000/ Ramsar sites.	Screened out (Category A)
2 - In vibrant rural places with access to homes, jobs and services	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies related to regeneration and development.	Screened out (Category A)
3 - In distinctive regions that tackle health and socio-economic inequality through sustainable growth	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies related to regeneration and development.	Screened out (Category A)
4 - In places with a thriving Welsh Language	This is a general policy statement and would not lead to any effects on Natura 2000/ Ramsar sites.	Screened out (Category A)
5 - And work in towns and cities which are a focus and springboard for sustainable growth	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies related to regeneration and development.	Screened out (Category A)
6 - In places where prosperity, innovation and culture are promoted	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies related to regeneration and development.	Screened out (Category A)
7 - In places where travel is sustainable	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies related to transport and infrastructure.	Screened out (Category A)
8 - In places with world-class digital infrastructure	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies for digital and mobile communication.	Screened out (Category A)

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Outcomes	Screening justification	Screening Decision
9 - In places that sustainably manage their natural resources and reduce pollution	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies.	Screened out (Category A)
10 - In places with biodiverse, resilient and connected ecosystems	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies.	Screened out (Category A)
11 - In places which are decarbonised and climate-resilient	This has the potential to lead to change, however, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies.	Screened out (Category A)

Table 5: Screening Assessment of the NDF Policies

Policy	Screening justification	Screening Decision
Chapter 4: Strategic and Spatial Choices – The NDF Spatial Strategy		
P1 – Where Wales will grow	This policy sets out the Welsh Government’s support for sustainable growth in all parts of Wales. The policy will support the direction for growth in employment and housing opportunities and investment in infrastructure within the three National and Regional Growth Areas. This is an overarching policy and the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF policies for the National and Regional Growth Areas.	Screened out (Category A)
P2 – Shaping Urban Growth and Regeneration – Strategic Placemaking	This policy supports the growth and regeneration of towns and cities which positively contribute towards building sustainable places that support active and healthy lives. It supports sustainable growth such as a rich mix of uses and housing types, building places at a walkable scale, urban density development that can support public transport and local facilities, and integrated green infrastructure, informed by the planning authority’s Green Infrastructure Assessment. This is an overarching policy direction and implications for Natura 2000/ Ramsar sites are more appropriately addressed under other policies within the NDF which provide greater spatial detail.	Screened out (Category A)
P3 –Supporting Urban Growth and Regeneration - Public Sector Leadership	<p>This policy states that the Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration. The Welsh Government will work with local authorities and other public sector bodies to unlock the potential of their land and support them to take an increased development role. Whilst new development in Wales is likely to be focused around regenerating and developing existing urban town and city locations, there is the potential for larger development/ infrastructure projects resulting from implementing this policy to impact Natura 2000/Ramsar sites, particularly those in coastal and more rural areas.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P4 - Supporting Rural Communities	This policy outlines Welsh Governments support for sustainable and vibrant rural communities. It sets out the policy direction for Strategic and Local Development Plans to assess the needs and set out policies that support their rural communities. This is an overarching policy direction and implications for Natura 2000/ Ramsar sites are more appropriately addressed under other policies within the NDF which provide greater spatial detail.	Screened out (Category A)
P5 – Supporting the Rural Economy	This policy supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic and Local Development Plans. The policy sets out the need for Strategic and Local Development Plans to plan positively to meet the employment needs of rural areas including employment arising from the foundational economy; the agricultural and forestry sector, including proposals for diversification; start-ups and micro businesses. The Welsh Government also strongly supports development of innovative and emerging technology businesses and sectors, to help rural areas unlock their full potential. This is an overarching policy	Screened out (Category A)

Policy	Screening justification	Screening Decision
	direction and implications for Natura 2000/ Ramsar sites are more appropriately addressed under other policies within the NDF which provide greater spatial detail.	
P6 – Town Centre First	This policy sets the location criteria for new commercial, retail, education, health, leisure and public service facilities. The policy states that these facilities must be located within town or city centres with good access by public transport from the whole town or city and, where appropriate, to the wider region. A sequential approach must be used to inform the identification of the best location for significant new commercial, retail, education, health, leisure and public service facilities. This policy provides guidance on locating services and the approach to be taken to assess development plan allocations but implementing the policy itself would not lead to development and thus would have no implications for Natura 2000/ Ramsar sites.	Screened out (Category B)
P7 – Delivering Affordable Homes	This policy confirms that the Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised. The policy provides guidance for Strategic and Local Development Plans in relation to affordable housing needs. Details of the locations for growth, are assessed under other policies for each region, and as such, the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate policies for the National and Regional Growth Areas.	Screened out (Category B)
P8 - Flooding	<p>This policy outlines Welsh Government's support for flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority. Whilst flood alleviation projects are likely to be located around existing development, those projects in the vicinity of coastal areas, or alongside major rivers, could lead to potential impacts on Natura 2000/Ramsar sites.</p> <p>The Welsh Government is currently preparing a Draft National Strategy for Flood and Coastal Erosion Risk Management in Wales (Welsh Government, 2019a) in order to implement the Flood and Water Management Act. Policy 8 is based on the principles set out in the Strategy and would be implemented through the National Flood Strategy (once adopted). The National Flood Strategy went out for consultation in Summer 2019 and is currently being updated to reflect consultation comments. As part of the preparation of the Strategy a draft HRA Report was produced (Welsh Government, 2019). Adverse effects could not be ruled out and the HRA therefore included an assessment under Article 6(4) of the Habitats Directive, comprising an alternative solutions assessment and IROPI. The IROPI assessment then concluded that: <i>'The failure to proceed with the Strategy would mean that there would be no overall framework or co-ordination of the management of flood and coastal erosion risk in Wales, which would ultimately result in both serious risk to infrastructure, human health and public safety, and unacceptable social / economic consequences. With the increasing risk from flooding and coastal erosion exacerbated as a result of climate change, this risk will only increase over time. It is therefore considered that there are imperative reasons of overriding public interest for the Strategy'</i>. Compensation measures will therefore be required when projects come forward as the Strategy is implemented; however, the draft HRA of the National Flood Strategy goes on to state that: <i>'without information regarding the likely extent of any effects on integrity of individual European sites as a result of activities arising from the Strategy, it is not possible to predict what compensatory measures might be appropriate in</i></p>	<p>National Strategy for Flood and Coastal Erosion Risk Management in Wales Screened out (Category C)</p> <hr/> <p>Projects not associated with the National Strategy Screened in (Category I)</p>

Policy	Screening justification	Screening Decision
	<p><i>individual cases. Such measures will be expected to be identified at suitable locations at the project level, or alternatively if the same conclusion is made following HRAs of the more spatially specific local Flood and Coastal Erosion Risk Management (FCERM) strategies and projects. Compensatory measures are, in the majority of cases, likely to be in the form of compensatory habitat to replace that which is considered likely to be lost from FCERM activities arising from the strategy. The National Habitat Creation Programme (NHCP), managed by Natural Resources Wales, but supported by other Risk Management Authorities (RMA's), is delivering on a strategic basis, the compensatory habitat necessary to compensate for any habitats lost as a result of FCERM plans, strategies and projects.</i> It should be noted that coastal schemes are likely to go through to the IROPI stage of assessment, due to potential impacts associated with coastal squeeze. However, compensation measures will be delivered through a Welsh Government fund (the National Habitat Creation Programme which is managed and delivered by NRW) to ensure the appropriate provision of the compensatory habitat, as is necessary. As the Strategy has already gone through the HRA process, no further assessment is required, and it can be screened out under Category C.</p> <p>The Majority of flood defence works in Wales would be carried out under the National Strategy. Therefore, the only projects screened into the Appropriate Assessment are those which fall outside of the National Strategy, including private flood defence works. The potential implications for Natura 2000/ Ramsar sites as a result of these projects are provided in more detail in the Appropriate Assessment.</p>	
<p>P9 – Resilient Ecological Networks and Green Infrastructure</p>	<p>This policy sets criteria to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of Green Infrastructure. The policy states that in all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and Green Infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment. Whilst this would be categorised as a policy for the protection of environmental assets (Category D), if Green Infrastructure is developed in unsuitable locations, it may not necessarily be compatible with the conservation objectives for Natura 2000/ Ramsar sites designated for the presence of other habitat types or species. As such, the potential for unsuitable sites to be converted into Green Infrastructure is not accounted for by the policy and potential impacts cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of developing new Green Infrastructure under this policy are provided in more detail in the Appropriate Assessment.</p>	<p>Screened in (Category I)</p>
<p>P10 – International Connectivity</p>	<p>This policy identifies the Strategic Gateways in Wales including Cardiff Airport, Holyhead Port, Fishguard Port, and Haven Waterway (including the Ports of Milford Haven and Pembroke Dock) and recognises the important roles they play in international connectivity and regional economies.</p> <p>The policy sets out support for the Strategic Gateways, in order that their international connectivity role can be maintained, and also requires lower-tier plans to ensure that the benefits the Strategic Gateways provide to their respective regions, and Wales, are maximised.</p>	<p>Screened in (Category I)</p>

Policy	Screening justification	Screening Decision
	<p>The policy does not explicitly encourage new development at the Strategic Gateways nor an expansion of their capacity. However, in order for their international connectivity role to be maintained, over the course of the NDF period, there is the potential that new development, or an expansion in their capacity, may be required.</p> <p>Any increase in the capacity of Holyhead, Haven Waterway, Fishguard and Cardiff Airport could potentially result in impacts on Natura 2000/Ramsar sites around the Anglesey coast, Pembrokeshire coast, and the Severn Estuary. Wider environmental effects (such as increased air pollution and the overall potential contribution to climate change) should also be considered.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	
P11 - National Connectivity	<p>This policy sets out the Welsh Government's support and investment in improving national connectivity. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to support the delivery of improvements to the national cycle network, rail network, bus network and the strategic road network. Although the majority of the improvement works are likely to take place within the existing cycle, rail and road network, there is the potential for larger infrastructure projects to impact Natura 2000 sites/ Ramsar sites, especially those located in coastal or more rural locations.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P12 – Regional Connectivity	<p>This policy outlines Welsh Governments support and investment in improving regional connectivity. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to support the delivery of improvements to the bus and metro system as well as helping to implement the Active Travel Act and supporting suitable fuelling infrastructure for ultra-low emission vehicles. Although the majority of the improvement works are likely to take place within the existing networks, there is the potential for larger infrastructure projects to impact on Natura 2000 sites/ Ramsar sites, especially those located in coastal or more rural locations.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P13 – Supporting Digital Communications	<p>This policy sets out the Welsh Government's support for the provision of digital communications infrastructure and services across Wales. Whilst it is considered likely that the majority of such digital communication infrastructure would be small scale and within existing urban locations, the policy also recognises the need for improved mobile telecommunications and broadband infrastructure in rural areas. Given the rural topography and physical distance of some villages/ towns in Wales, there is the potential for the installation of larger more remote digital communication infrastructure to impact on Natura 2000/Ramsar sites.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)

Policy	Screening justification	Screening Decision
P14 – Planning in Mobile Action Zones	<p>This policy sets out a commitment to increase mobile coverage and will identify Mobile Action Zones across Wales, showing locations where there is little or no mobile telecommunications coverage. Whilst it is considered likely that the majority of such infrastructure would be small scale, and would fall under permitted development, given the rural topography and physical distance of some villages/ towns in Wales, there is the potential for the installation of larger more remote mobile communication infrastructure to impact on Natura 2000/Ramsar sites.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P15 – National Forest	<p>This policy sets out Welsh Government’s commitment to developing a national forest for Wales. Whilst the policy is providing for a positive environmental outcome (Category D), development of forest habitat may not necessarily be compatible with the conservation objectives for Natura 2000/ Ramsar sites designated for the presence of other habitat types or species not associated with forests. As such, the potential for unsuitable sites to be converted to forest is not accounted for by the policy and potential impacts cannot be ruled out.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P16 – Heat Networks	<p>This policy encourages planning authorities to identify opportunities for District Heat Networks and requires new and existing development to integrate them, where appropriate. The policy sets the requirement for developers to prepare an Energy Masterplan to establish whether a heat network is the most effective energy option. This policy sets criteria but implementing the policy itself would not lead to development and therefore would have no implications for Natura 2000/ Ramsar sites.</p>	Screened out (Category B)
P17 – Renewable and Low Carbon Energy and Associated Infrastructure	<p>This policy sets out Welsh Government’s support, in principle, of developing renewable and low carbon energy, from all technologies and at all scales, to meet our future energy needs. The policy refers to proposals for other large-scale renewable energy generation which do not qualify as Developments of National Significance (DNS), refer to Policy P18. Projects would need to demonstrate there would be no unacceptable adverse impacts upon nature conservation sites and species as a result of such applications. Whilst this provides some assurance that applications will be required to show that they have assessed the potential impacts upon designated sites, it cannot be relied upon to conclude that there would be no LSEs upon Natura 2000/ Ramsar sites.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened In (Category I)
P18 - Renewable and Low Carbon Energy Developments of National Significance	<p>This policy sets out the criteria to be met by projects which qualify as DNSs. It puts a requirement on projects to demonstrate that <i>‘there are no adverse impacts on international and national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species.’</i> This policy would not in itself lead to development, and the implications for Natura 2000/ Ramsar sites are more appropriately addressed under the separate NDF Policy 17 for Renewable and Low Carbon Energy and Associated Infrastructure.</p>	Screened Out (Category B)

Policy	Screening justification	Screening Decision
Chapter 5: The Regions		
P19 – Strategic Policies for Regional Planning	This policy provides an outline of the criteria to be embedded in Strategic Development Plans and constituent Local Development Plans, where relevant. The policy includes the requirement for Strategic Development Plans to establish ecological networks and opportunities for protecting or enhancing the connectivity of these networks and the provision of Green Infrastructure. This policy sets the criteria and direction for Strategic and Local Development Plans but implementing the policy itself would not lead to development and therefore would have no implications for Natura 2000/ Ramsar sites.	Screened out (Category B)
The North		
P20 – National Growth Area - Wrexham and Deeside	<p>This policy sets out Welsh Government's support for Wrexham and Deeside as the main focus for growth and investment in the North region. The policy sets out the direction that Strategic and Local Development Plans should take and must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure. Although new development and regeneration is likely to be focused around existing urban locations, there are a number of Natura 2000/ Ramsar sites located close to Wrexham and Deeside, as well as around the coastline to the north of Deeside, and therefore potential for LSE on these sites cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P21 – Regional Growth Area - North Wales Coastal Settlements	<p>This policy sets out Welsh Government's support for sustainable growth and regeneration in regionally important towns along the northern Coast. Holyhead, Caernarfon, Bangor, Llandudno, Colwyn Bay, Rhyl and Prestatyn will be a focus for managed growth and they have an important sub-regional role complementing the National Growth Area of Wrexham and Deeside. The policy requires Strategic and Local Development Plans across the region to recognise the roles of these coastal settlements as a focus for housing, employment, tourism, public transport and key services. Although new development and regeneration is likely to be focused around existing urban locations, there are a number of Natura 2000/ Ramsar sites around the north Wales coast, both on- and off-shore, which could be affected by increased growth within the region and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P22 – Green Belts in the North	This policy requires the Strategic Development Plan to identify a green belt around Wrexham and Deeside to manage urban form and growth. This policy serves to protect environmental assets from development and would have no implications for Natura 2000/ Ramsar sites.	Screened out (Category D)

Policy	Screening justification	Screening Decision
P23 – North Wales Metro	<p>This policy sets out Welsh Government’s support for the development of the North Wales Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities, including working with local and regional authorities to strengthen cross-border transport connections. The policy sets the direction for Strategic and Local Development Plans in terms of supporting the metro and planning growth to maximise the opportunities arising from better regional and cross-border connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations. Although development around new and improved Metro stations is likely to be focused around existing urban locations, there are a number of Natura 2000/ Ramsar sites around the north Wales coast, which could be affected by such development and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened In (Category I)
P24 – North West Wales and Energy	<p>This policy sets out Welsh Government’s support for North West Wales as a location for new energy development and investment. Developments associated with the Isle of Anglesey Energy Island Programme, Wylfa Newydd and Trawsfynydd will be supported as a means to create significant economic benefits for the area as well as generating renewable or low carbon energy. Given the potential scale of such development, new energy projects in North West Wales could affect Natura 2000/ Ramsar sites located both on land and around the coastline of the region.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened In (Category I)
Mid		
P25 – Regional Growth Areas – Mid-Wales	<p>This policy outlines Welsh Government’s support for sustainable growth and development in a series of inter-connected towns across the region. Development in these Regional Growth Areas should meet the regional housing, employment and social needs of Mid Wales. The Regional Growth Areas are: The Teifi Valley, including Cardigan and Llandysul, Newcastle Emlyn and Lampeter, Brecon and the border, The Heart of Wales, including Llandrindod Wells and Builth Wells, Bro Hafren, including Welshpool and Newtown and Aberystwyth. The policy sets out the direction that Strategic and Local Development Plans should take to determine the most appropriate locations for growth in Mid Wales.</p> <p>Although new development and regeneration is likely to be focused around existing urban locations, there are a number of Natura 2000/ Ramsar sites located close to these towns, as well as around the west Wales coastline, which could be affected by increased growth within these areas and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)

Policy	Screening justification	Screening Decision
P26 – Growing the Mid Wales Economy	<p>This policy sets out the Welsh Governments support for growth and development of existing and new economic opportunities across Mid Wales. The policy sets out the direction that Strategic and Local Development Plans should take to develop policies that support agriculture and land based traditional rural enterprises and provide a flexible framework to support the development of new, innovative and emerging technologies and sectors.</p> <p>Although new development and regeneration is likely to be focused around existing urban locations, there are a number of Natura 2000/ Ramsar sites located across mid-Wales, which could be affected by increased growth within these areas and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P27 – Movement in Mid-Wales	<p>The Welsh Government will work with local and regional authorities to ensure transport investments improve accessibility across Mid Wales and strengthen cross-border transport links. The policy sets out the direction Strategic and Local Development Plans should take to support improved transport links within the region and with other regions and England, and plan growth to maximise the potential opportunities arising from better regional connectivity. Although the majority of the improvement works are likely to take place within the existing transport networks, there is the potential for larger infrastructure projects to impact on Natura 2000 sites/ Ramsar sites located across mid-Wales and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
South West		
P28 –National Growth Area - Swansea Bay and Llanelli	<p>This policy outlines Welsh Government’s support for Swansea Bay and Llanelli to be the main focus for growth and investment in the South West region. The policy sets out the direction that Strategic and Local Development Plans should take to recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>Although new development and regeneration is likely to be focused around existing urban locations, there are a number of Natura 2000/ Ramsar sites located close to these towns as well as around the coastline of south and west Wales, which could be affected by increased growth within these areas and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P29 – Regional Growth Areas – Carmarthen and the Haven Towns	<p>This policy sets out Welsh Government’s support for sustainable growth and regeneration in Carmarthen and the Pembrokeshire Haven Towns (Haverfordwest, Milford Haven, Pembroke and Pembroke Dock). These areas will be a focus for managed growth, reflecting their important sub-regional functions and strong links to the National Growth</p>	Screened in (Category I)

Policy	Screening justification	Screening Decision
	<p>Area of Swansea Bay and Llanelli. The policy sets out the direction that Strategic and Local Development Plans should take to recognise the roles of these places as a focus for housing, employment, tourism, public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth.</p> <p>Although new development and regeneration is likely to be focused around existing urban locations, there are a number of Natura 2000/ Ramsar sites located close to some of these towns, as well as around the coastline, including the Haven Waterway adjacent to the Haven Towns and Carmarthen and West Wales Marine site off the coast of Aberystwyth, which could be affected by increased growth within these areas and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	
P30 – Green Belts in the South West	<p>This policy supports the use of Strategic Development Plans to identify and establish green belts to manage urban form and growth in the South West, particularly around Swansea Bay and Llanelli. This policy serves to protect environmental assets from development and would have no implications for Natura 2000/ Ramsar sites.</p>	Screened out (Category D)
P31 – South West Metro	<p>This policy sets out Welsh Government's support for the development of the South West Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities. Although potential new rail infrastructure, and other development associated with the South West Metro is likely to be focused around existing urban locations, there are a number of Natura 2000/ Ramsar sites (including Crymlyn Bog SAC, which lies between Swansea and Neath), which could be affected by such development and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened In (Category I)
P32 – Haven Waterway and Energy	<p>This Policy sets out Welsh Government's position in relation to the operations at Haven Waterway and recognises its location for potential new renewable and low carbon energy-related development, innovation and investment. Energy-related development associated with the port could affect the Natura 2000/ Ramsar sites located around the Pembrokeshire coast, including the Haven Waterway itself.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened In (Category I)
South East		
33 – National Growth Area - Cardiff, Newport and the Valleys	<p>This policy provides support for Cardiff, Newport and the Valleys as being the main focus for growth and investment in the South East region. This policy supports Cardiff's status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night-time economy and finance. The Severn Estuary SAC/SPA/Ramsar site lies to the south of the City.</p>	Screened In (Category I)

Policy	Screening justification	Screening Decision
	<p>Although the potential for impacts on Natura 2000/Ramsar sites is considered to be lower than in other areas in the region, there is still the potential for this site to be affected as a result of growth in and Cardiff.</p> <p>This policy supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The River Usk SAC flows through the City and the Severn Estuary SAC/SPA/Ramsar site lies to the south. Continued growth of the Newport, particularly on the outer edges of the City has the potential to impact on nearby Natura 2000/ Ramsar sites and therefore LSE cannot be ruled out.</p> <p>This policy supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys. Whilst the focus of the policy is on regeneration, potential effects upon Natura 2000/ Ramsar sites in the region cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	
P34 – Green Belts in the South East	<p>This policy requires the Strategic Development Plan to identify a green belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth. This policy serves to protect environmental assets from development and would have no implications for Natura 2000/ Ramsar sites.</p>	Screened out (Category D)
P35 – Valleys Regional Park	<p>This policy supports the establishment of the Valleys Regional Park. The policy recognises that Strategic and Local Development Plans embed the principles of a Valleys Regional Park into their planning frameworks. The Welsh Government will work with local authorities, the third sector and key partners to support the Valleys Regional Park and maximise opportunities for new development. Whilst environmental assets form a key part of the framework, the policy also looks to maximise the potential for new development to help with the regeneration of the area. Effects upon Natura 2000/ Ramsar sites cannot therefore be ruled out.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)
P36 – South East Metro	<p>This policy sets out the Welsh Governments support for the development of the South East Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities. Whilst the focus of this policy is on urban locations within the south Wales region, there are a number of Natura 2000/ Ramsar sites in southwest Wales, which could be affected by such development and therefore LSE cannot be ruled out at this stage.</p> <p>The potential implications for Natura 2000/ Ramsar sites as a result of this policy are provided in more detail in the Appropriate Assessment.</p>	Screened in (Category I)

2.3 Screening Conclusion

Chapters 1 and 2 of the NDF have been screened out as they contain introductory text and contextual information which would not lead to any effects on Natura 2000/ Ramsar sites. Chapter 3 comprises the Outcomes of the NDF. Although all of the outcomes have the potential to lead to change, as the policies are the mechanism through which the outcomes will be achieved, assessment of the policies themselves (which contain more detailed information) is more appropriate, and is in-line with guidance set out within Part F of the DTA HRA Guidance. Chapter 3 has therefore also been screened out of further assessment.

Of the 36 policies set out within Chapters 4 and 5 of the NDF, 12 can be screened out from Appropriate Assessment since they either would not lead directly to change, or if they did, any change would be of such small scale that no likely significant effect on Natura 2000/ Ramsar sites could occur either alone or in combination.

The remaining 24 policies are considered to have the potential to direct future development such that there could be implications for Natura 2000/ Ramsar sites. These policies have therefore been screened in for further Appropriate Assessment alone and in-combination, the results of which are outlined in Section 4.

3 In-Combination Effects

The policies set out within the NDF have been developed taking into account the requirements of the Well-being of Future Generations Act 2015 (WFGA 2015), The Environment (Wales) Act 2016, the Sustainable Management of Natural Resources (SMNR) (Welsh Government, January 2019) and the Natural Resources Policy (NRP) (Welsh Government, 2017). They are therefore founded on the principles of sustainability, which include the requirement to protect Natura 2000 / Ramsar sites. Nevertheless, any policies aimed at supporting development have the potential to have adverse effects on such sites, and even if they are worded specifically to reduce the risk of such impacts to 'acceptable' levels, it is not always possible to ensure that there are not conflicts with other policies that might compromise these protections.

The NDF includes two main sections setting out policies: Chapter 4 describes those policies associated with strategic and spatial choices that would apply across Wales (such as broad policies relating to urban growth, housing or renewable energy), whilst Chapter 5 sets out policies applying specifically to particular regions (i.e. North, Mid and South-west and South-east Wales). Whilst it is considered unlikely that there would be in-combination effects between the three regions (since impacts associated with the regional policies have a spatial element which are unlikely to impact sites in other regions), the spatial policies for these regions do have the potential to act in combination with the overarching strategic policies in Chapter 4. This is because the national nature of the latter means that it is possible that they could lead to additional development within a region to that already determined by the regional policies. It is also considered possible that any of the screened-in strategic policies in Chapter 4 could act in combination with each other. This is because if policies outlining the approach for different types of development have the same spatial focus, then effects which may not be significant on their own may become significant in combination with each other if proposals could lead to effects on the same Natura 2000 / Ramsar site. Thus, for example, the strategic policies relating to renewable energy and housing could have significant effects if they each lead to development adjacent to the same European site, even if on their own they are not significant. However, as all lower-tier plans and projects with the potential to impact Natura 2000 / Ramsar sites are required to comply with the Conservation of Habitats and Species Regulations (2017) PPW 10 and TAN 5, any potential in-combination effects (such as air quality or recreational pressures) would be identified at the lower-tier plan stage. The Welsh Government would not support any lower-tier plans or projects, associated with policies within the NDF, where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation.

In addition to the in-combination effects between screened-in policies, the potential also exists for policies which were screened out as 'Category J' in the screening assessment to act in combination with other policies; this is because this category relates to policies which on their own would not have a significant effect, but which could have an effect in-combination with other policies. However, no policies were categorised in this way, so no in-combination effects of screened-out policies with other policies with the NDF are anticipated. The potential for in-combination effects from the 24 policies taken forward for Appropriate Assessment is considered in Section 5.

4 Appropriate Assessment

4.1 Appropriate Assessment Approach

This Section comprises the Appropriate Assessment (Stage 2 of the HRA process) of the 24 policies which could not be screened out at the screening stage of the HRA process (refer to Table 5). The Appropriate Assessment provides a more detailed assessment of the potential implications for Natura 2000 / Ramsar sites that could arise as a result of implementation of the NDF policies.

For projects, full details of the proposals are required to determine the mitigation measures required before a meaningful conclusion can be drawn as to whether a project will have no LSE or no adverse effect on integrity. This is not possible for plans, especially high-level plans such as the NDF, which by definition are strategic in nature. High-tier Strategic Plans set the overall policy framework which lower-tier plans and projects must adhere to. In most cases the specific details of development provided for within a plan will not be available until a later date, after it has been adopted. In the case of the NDF this will be through Strategic Development Plans, Local Development Plans and other strategic planning documents and projects which come forward during the plan period.

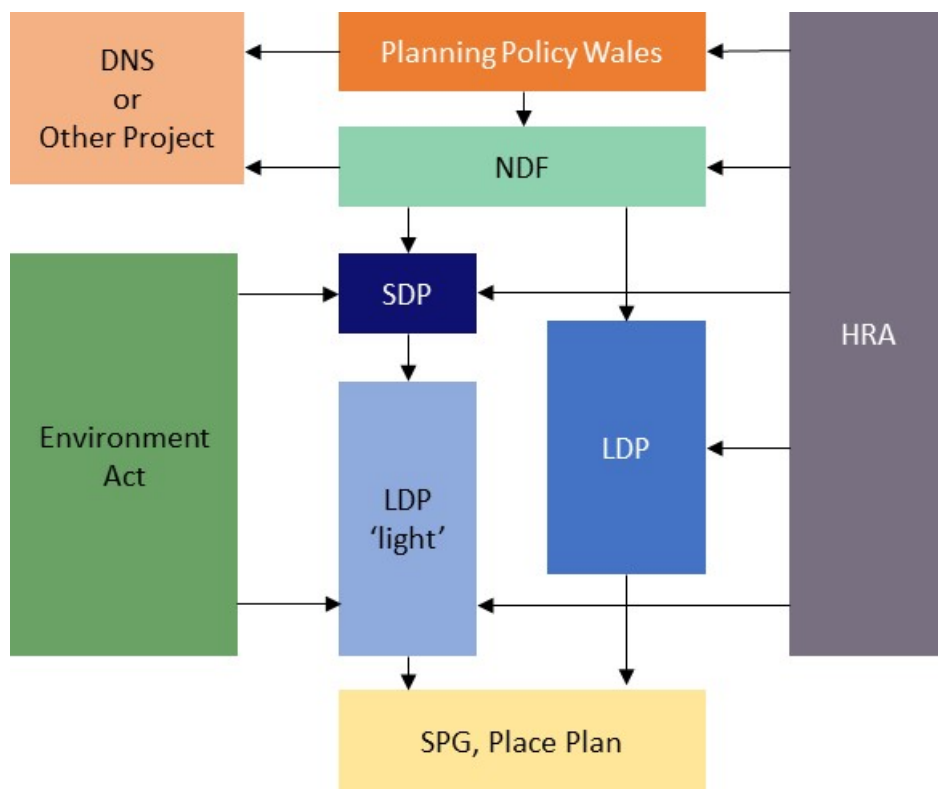
For the NDF there are a number of policies with a spatial element; for these, the Natura 2000 / Ramsar sites that could be affected as a result of the policy are identified (where possible) with examples of the types of impacts that could occur. Since no specific development allocations or proposals are identified in the NDF, the full scope of potential effects (on qualifying features or habitats / species typical of those features) cannot be identified at this strategic stage, and therefore any effects identified here without a spatial element are not considered to be a conclusive list of all possible impacts. However, every effort has been made to identify potential impacts based on the buffers and information identified in Section 1.5, current knowledge available at the time of writing and professional judgement.

In addition to the assessment of the potential for an adverse effect on the integrity of a Natura 2000 / Ramsar site of each of the screened-in policies, the requirement for avoidance / mitigation to ensure such effects would not occur is also included in the assessment [note that the recent European Court judgment in the case of People Over Wind has clarified that it is not appropriate at the screening stage to take account of measures intended to avoid or reduce the harmful effects of a plan or project upon a Natura 2000 / Ramsar site, and such measures should, instead, be taken into account as part of an Appropriate Assessment]. At the strategic level of the NDF, mitigation is usually focused primarily on changing policy wording, and the various stages of the NDF have allowed an iterative process whereby policy wording has been amended, where appropriate, to avoid adverse impacts. As well as wording changes and strengthening of policies, a table has also been developed which highlights to Local Planning Authorities, Strategic Planning Panels and developers measures which must be adhered to when preparing lower-tier plans and projects (refer to Section 4.2). Further plan-level and project-level ecological assessments and HRA will inevitably be required for many of the projects which come forward as a result of policy implementation; however these measures will ensure the deliverability of the NDF through these lower-tier plans and projects.

4.2 Avoidance / Mitigation Measures

As stated above, at this high-level it is not possible to determine the exact details of specific avoidance / mitigation measures; however the Appropriate Assessment includes the types of measures which must be adhered to by Local Planning Authorities, Strategic Planning Panels and developers to ensure no adverse effect on integrity. It is important that this HRA provides the high-level policy reassurance that future SDPs and LDPs will follow the necessary process to identify and assess potential implications for Natura 2000 / Ramsar sites when allocating land for development. The subsequent local plan-level, or even project-level, HRAs will need to take into consideration the potential impacts and avoidance / mitigation measures identified in this HRA to guide their policy development and ensure that mitigation measures can be delivered where potential for adverse effects are identified (specific reference to this section of the HRA has been included in Chapter 1 of the NDF). If there is the potential for land allocations and projects, developed as a result of implementing any policies within the NDF, to adversely impact on Natura 2000 / Ramsar sites, these should be withdrawn or amended and re-assessed or pass the derogations set out under Article 6(4) of the Habitats Directive, namely no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and compensatory measures secured. The NDF does not support any lower-tier plans or projects where adverse effects on Natura

2000 / Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5 (refer to Section 1.4). The flow diagram below shows how the outcomes of the NDF (and therefore this HRA) feeds into the planning process.



Two types of avoidance / mitigation measures have been included in the Appropriate Assessment. The first type are more general measures which would be applicable to the majority of polices. These are detailed in Table 6 below. The reference codes within Table 6 have been used in the Appropriate Assessment table (Table 7). The second type of measures are those which are more specific to the policy and are detailed in full within Table 7.

Table 6: Avoidance / Mitigation measures

Potential impact	Measures
Impacts associated with loss of habitat	Development within Natura 2000 / Ramsar sites
	<p>A Avoid allocating land / development within Natura 2000 / Ramsar sites.</p> <p>If allocating land / development within Natura 2000 / Ramsar sites cannot reasonably be avoided (for example, flood defence works), where possible minimise the footprint of the proposals. Make certain that impact pathways are well understood and ensure that appropriate mitigation measures can be delivered where potential for adverse effects are identified.</p>
	Development on land known to be functionally linked to Natura 2000 / Ramsar sites [and identified as functionally linked to a Natura 2000 / Ramsar site has the same level of protection as the Natura 2000 / Ramsar site itself]
	<p>B Avoid allocating land / development in areas known to be functionally linked to a Natura 2000 /</p>

Potential impact	Measures
	<p>Ramsar site.</p> <p>If allocating land / development in areas known to be functionally linked to a Natura 2000 / Ramsar site cannot reasonably be avoided (for example, flood defence works or linear development such as road schemes), where possible minimise the footprint of the proposals. Make certain that impact pathways are well understood and ensure that appropriate mitigation measures can be delivered where potential for adverse effects are identified.</p> <p>Local Planning Authorities and Strategic Planning Panels could consider allocating mitigation land within their emerging plans where potential for adverse effects in terms of loss of habitat has been identified.</p>
<p>Impacts associated with disturbance / displacement (e.g. noise, visual and vibration effects)</p>	<p>Avoid allocating land / development adjoining Natura 2000 / Ramsar sites or land known to be functionally linked to a Natura 2000 / Ramsar site where the potential for disturbance / displacement effects are likely to be greatest.</p> <p>If allocating land / development adjoining Natura 2000 / Ramsar sites or land known to be functionally linked to a Natura 2000 / Ramsar site cannot reasonably be avoided, where possible minimise the footprint of the proposals. Make certain that impact pathways are well understood and ensure that appropriate mitigation measures can be delivered where potential for adverse effects are identified.</p> <p>Where potential for disturbance / displacement effects have been identified, measures such as buffer zones at the edge of developments, timing works to avoid sensitive times (such as bird breeding season or fish migration periods), noise mitigation, visual screening (natural and artificial), alterations to lighting design to reduce light spill and reducing access to sensitive habitats could be incorporated into scheme designs to avoid such effects. An on-site monitoring plan in terms of noise, lighting, etc. combined with behavioural monitoring of the qualifying feature.</p>
<p>Impacts associated with linear development or infrastructure</p>	<p>Avoid allocating land / development which could sever habitat links, cause fragmentation of habitats or impede dispersal of qualifying habitats / species associated with Natura 2000 / Ramsar sites (such as commuting routes of bats, movement of great crested newts between breeding ponds, or otter / fish riverine features, obstructing access between sites and functionally-linked land).</p> <p>If linear development cannot reasonably be avoided (for example, a new road scheme), where possible minimise the amount of linear habitat loss. Make certain that impact pathways are well understood and ensure that appropriate mitigation measures can be delivered where potential for adverse effects are identified.</p> <p>Where there is the potential to affect linear features, measures such as green bridges, new planting and habitat linkages, as well as integrating with existing Green Infrastructure could be incorporated into scheme designs to mitigate such effects. Ensure compliance with the Wales Transport Strategy (currently being updated).</p>
<p>Impacts associated with recreational pressure (e.g. damage to sensitive qualifying habitats and disturbance / displacement of qualifying species)</p>	<p>Avoid allocating land / development which could increase recreational pressure on sensitive habitats and species (in particular ground nesting birds) associated with Natura 2000 / Ramsar sites (for example, avoiding new housing developments within walking distance of Natura 2000 / Ramsar sites already known to be at risk from existing users).</p> <p>If allocating land / development which could increase recreational pressure cannot reasonably be avoided, where possible minimise the footprint or the density of housing in that area. Make certain that impact pathways are well understood and ensure that appropriate mitigation measures can be delivered where potential for adverse effects are identified.</p> <p>Where there is the potential for recreational pressure to adversely impact on sensitive habitats, the following measures could be considered as part of the mitigation plan: providing sufficient public open space within developments such that there would not be a need to go elsewhere, in particular</p>

Potential impact	Measures
	<p>ensuring that there is sufficient space available for dog walkers; avoid linking new footpaths into existing footpaths which lead to sensitive areas; promote the use of alternative open space through, for example, homeowner packs; installing additional fencing in sensitive areas to restrict access (to dog walkers and vehicles); and, if required, restrict access to unauthorised car parking areas and promote the use of car parks in less sensitive areas.</p>
<p>Impacts associated with water quality <i>(e.g. run-off from surface water drainage)</i></p>	<p>Avoid allocating land / development which could lead to adverse impacts on the water quality of Natura 2000 / Ramsar sites.</p> <p>If allocating land / development which could lead to adverse impacts on water quality cannot reasonably be avoided, make certain that impact pathways are well understood and ensure that appropriate mitigation measures can be delivered where potential for adverse effects are identified.</p> <p>Ensure hydrological assessments are carried out to determine the potential for hydrological links between sites and designated areas. The following measures could be considered: incorporation of Sustainable Drainage Systems (SuDS) and other nature-based surface water drainage solutions into scheme designs; incorporation of water quality protection measures which would be secured through a Construction Environmental Management Plan (CEMP).</p>
<p>Impacts on water resources <i>(e.g. changes which could affect groundwater dependant ecosystems)</i></p>	<p>Avoid allocating land / development which could lead to adverse impacts on groundwater dependant ecosystems (for example, mortality of qualifying species, (in particular, fish) from increased water abstraction and impacts associated with changes in the hydrological regime as a result of water abstraction, changes to foul water drainage systems or other waste management systems).</p> <p>If allocating land / development which could lead to adverse impacts on groundwater dependant ecosystems cannot reasonably be avoided, make certain that impact pathways are well understood and ensure that appropriate mitigation measures can be delivered where potential for adverse effects are identified. Note that Natura 2000 / Ramsar sites could be affected by water abstraction and potential discharge of effluent from wastewater treatment works or other waste management streams serving new development over large distances; therefore ensure that potential impacts have been considered within and outside of a plan area.</p>
<p>Impacts associated with air quality <i>(e.g. increased deposition of air pollutants arising from development, including emissions from increases in traffic)</i></p>	<p>Avoid allocating land / development which could lead to adverse impacts on air (for example, development which could exceed the critical load of the habitats associated with a Natura 2000 / Ramsar site).</p> <p>If allocating land / development which could lead to adverse impacts on air quality cannot reasonably be avoided, make certain that impact pathways are well understood and ensure that appropriate mitigation measures can be delivered where potential for adverse effects are identified.</p> <p>The following measures could be considered as part of the mitigation plan: set limits on the emissions from industry / new housing developments; promote the use of sustainable transport (improve access to alternative forms of transport); steer development towards existing facilities and job opportunities to reduce car usage; incorporate sustainable transport systems wherever possible, in line with the Active Travel Act.</p>

4.3 Appropriate Assessment Table

Table 7 below provides the Appropriate Assessment for the policies screened into the assessment (refer to Table 5).

Table 7: Appropriate Assessment of Screened-in Policies

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
<p>P3 –Supporting Urban Growth and Regeneration - Public Sector Leadership</p>	<p>This policy states that <i>'the Welsh Government will assemble land, invest in infrastructure and prepare sites for development.'</i> Although the exact details of such development are not known at the high-level of the NDF, this policy supports growth and regeneration for the benefit of communities across Wales.</p> <p><u>Impacts</u></p> <p>As there is no spatial element to the policy, it is not possible to determine which Natura 2000 / Ramsar sites could be affected by future growth and regeneration in the public sector. However, as public land could include or lie adjacent to Natura 2000 / Ramsar sites, there is the potential for adverse effects on such sites. Potential impacts could include (but are not limited to): disturbance to qualifying features (for example, disturbance / displacement of qualifying bird species if growth and regeneration is located on the edge of urban areas or in coastal settlements in the vicinity of SACs/SPAs/Ramsar sites or land known to be functionally linked to Natura 2000 / Ramsar sites, severance of commuting routes for bats and great crested newts); as well as damage to important habitats associated with Ramsar sites/ SACs (for example, through water / air pollution or increased disturbance as a result of recreational pressure from an increased population within a region).</p> <p><u>Avoidance / Mitigation</u></p> <p>The main focus of the policy is to encourage investment and regeneration in existing urban areas; however, where there is the potential to impact Natura 2000 / Ramsar sites, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when preparing lower-tier plans and projects to ensure no adverse impact on the integrity of Natura 2000 / Ramsar sites as a result of policy implementation:</p> <p><i>Avoidance / mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans (including land allocations) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW 10 and TAN 5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan / project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn or amended and re-assessed or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. <p><u>Conclusion</u></p>	<p>No adverse effect on integrity of Natura 2000 / Ramsar sites.</p>

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW 10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P8 – Flooding	<p>The Welsh Government is currently preparing a Draft National Strategy for Flood and Coastal Erosion Risk Management in Wales (Welsh Government, 2019a) in order to implement the Flood and Water Management Act. Policy 8 is based on the principles set out in the Strategy; however, as the Strategy has already gone through the HRA process and the mechanisms through which compensation can be delivered agreed (through the NHCP), it falls within Category C of the DTA Guidance and has been screened-out of further assessment (refer to Table 5). The majority of flood defence works in Wales would be carried out under the National Strategy and would be developed in line with the Strategy. Therefore the only consideration in the Appropriate Assessment would be those projects which fall outside of the National Strategy, including private flood defence works.</p> <p>Given that significant areas of Wales which are at risk of flooding and coastal erosion are also designated as Natura 2000 / Ramsar sites, flood alleviation works have the potential for significant adverse effects on such sites.</p> <p><u>Impacts</u></p> <p>The Majority of flood defence works in Wales would be carried out under the National Strategy; for those which do not, the following impacts which could arise from any flood and coastal erosion projects include (but are not limited to): changes to water chemistry; reduced surface water flooding; changes to flow and velocity regime and improved drainage; competition from non-native species; disturbance (noise, visual presence); habitat and community simplification; changes in turbidity; physical damage; changes in physical regime; and habitat loss.</p> <p><u>Avoidance / Mitigation</u></p> <p>Although the policy states that <i>'Flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported'</i>, the policy also includes wording aimed at the protection of internationally designated sites: <i>It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.</i></p> <p>Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when preparing lower-tier plans and projects to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites as a result of policy implementation:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A, B, C, D, E, F, G, H</i></p> <p><i>Policy specific measures:</i></p> <ul style="list-style-type: none"> Any other projects which come forward as a result of implementation of Policy 8, not related to the National Flood Strategy, must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply 	No adverse effect on integrity of Natura 2000 / Ramsar sites.

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>with PPW 10 and TAN 5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation.</p> <ul style="list-style-type: none"> • If there is the potential for flood alleviation projects (not related to the National Strategy) to adversely impact on Natura 2000 / Ramsar sites (such as coastal schemes), these should be withdrawn or amended and re-assessed or pass the derogations set out under Article 6(4) of the Habitats Directive, namely no alternative solutions, IROPI and compensatory measures secured. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW 10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P9 – Resilient Ecological Networks and Green Infrastructure	<p>Overall, this policy will provide many positive environmental outcomes, promoting enhancement of biodiversity and safeguarding ecological networks. The development and maximising of Green Infrastructure will also lead to positive environmental benefits, including linking existing and new habitat areas to create a green network across Wales. However, if Green Infrastructure is developed in unsuitable locations, incompatible with the conservation objectives for Natura 2000 / Ramsar sites, there is the potential for significant adverse effects on such sites.</p> <p><u>Impacts</u></p> <p>As there is no spatial element to the policy, it is not possible to determine which Natura 2000 / Ramsar sites could be affected by Green Infrastructure development; however, if it is located in unsuitable places, implementation of the policy could potentially lead to detrimental impacts on existing habitats and species. Potential impacts could include (but are not limited to): scrub encroachment onto open habitats such as heathland or grassland; planting woodland adjacent to sensitive habitats could also have adverse effects, especially if species from those sites depend upon similarly open habitats beyond the site boundaries (e.g. for foraging or roosting). Changing habitats adjacent to sensitive sites could provide cover for predators of the qualifying species (in particular ground nesting birds) or could potentially affect the hydrology of the landscape, which could adversely affect wetland sites. Increasing the number of visitors to Green Infrastructure has many positive benefits in terms of supporting physical and mental well-being; however, this could also have detrimental impacts associated with recreational pressure (such as disturbance from increased human presence and dog walkers).</p> <p><u>Avoidance / Mitigation</u></p> <p>It is clearly important to ensure that sites selected to support the delivery of this policy are not already designated for the presence of other habitats which would be compromised by new Green Infrastructure. Although the exact locations of Green Infrastructure enhancement or expansion projects is not currently known, Green Infrastructure Assessments, as well as ecological network and green infrastructure mapping, will be used to identify potential areas for improvement. These</p>	No adverse effect on integrity of Natura 2000 / Ramsar sites.

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>assessments and mapping will also identify existing sensitive areas and ensure that they are safeguarded; nevertheless, to make certain that existing Natura 2000 / Ramsar sites are protected, where sensitive habitats and species could be present, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when implementing this policy:</p> <p><i>Avoidance / mitigation measures applicable to more than one policy (refer to Table 6): A, B, C, D, E, F, G</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Green Infrastructure policies and/or projects developed through lower-tier plans (including allocating land for Green Infrastructure) must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW 10 and TAN 5). The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. • Green Infrastructure Assessments must fully consider the implication of any proposed enhancement / habitat creation on Natura 2000 / Ramsar sites to ensure no adverse effects on the integrity of Natura 2000 / Ramsar sites. In particular, the implications of human disturbance (including dog-walking) on sensitive habitats and qualifying species if new Green Infrastructure is aimed at providing a resource for recreation. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW 10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P10 – International Connectivity	<p>This policy identifies the Strategic Gateways in Wales, including Cardiff Airport, Holyhead Port, Fishguard Port, and Haven Waterway, including the Ports of Milford Haven and Pembroke Dock, and recognises, and seeks to help maintain, the important roles they play in international connectivity and regional economies:</p> <p><i>“The Welsh Government identifies the following Strategic Gateways to facilitate international connectivity:</i></p> <ul style="list-style-type: none"> • Cardiff Airport; • Holyhead Port; • Haven Waterway, including the Ports of Milford Haven and Pembroke Dock; and • Fishguard Port. <p><i>The Welsh Government will work with the operators, investors and local authorities to support the Strategic Gateways and maintain their international connectivity roles. Strategic and Local Development Plans should support the Strategic Gateways by maximising the benefits they provide to their respective regions and Wales. New development around the Strategic Gateways should be carefully managed to ensure their operation is not constrained or compromised.”</i></p> <p>Cardiff Airport</p>	No adverse effect on integrity of Natura 2000 / Ramsar sites.

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>Cardiff Airport has been recognised as an essential part of Wales' strategic transport infrastructure. Successfully maintaining the international connectivity role, could require new and improved airport facilities and passengers services to be delivered over the course of the NDF, including integration with the South Wales Metro (Policy 36) and improvements to pedestrian and cycle access. Policy P10 could therefore potentially facilitate the expansion of Cardiff Airport. Whilst there is uncertainty as to any future development, in accordance with the precautionary principle, it is appropriate to assume that there is potential for an expansion of services and therefore the need to identify the potential implications of this for Natura 2000 / Ramsar sites as a result of implementing this policy.</p> <p><i>Impacts (Cardiff Airport)</i></p> <p>The Severn Estuary SPA / Ramsar site/SAC is located to the east of the airport. Although direct impacts (such as habitat loss) on the habitat features of the SPA / Ramsar site/SAC can be ruled out. Any expansion of airport capacity in terms of increased flights and its associated infrastructure could have much wider environmental effects (including outside of Wales), and the potential implications for Natura 2000 / Ramsar sites would extend much further than for smaller-scale, ground-based development.</p> <p>The airport and Enterprise Zone were included within the Vale of Glamorgan Local Development Plan 2011 – 2026 (Vale of Glamorgan, June 2017). 'St Athan – Cardiff Airport Enterprise Zone' is a Strategic Opportunities Area (Policy MG10) within the LDP. A HRA of the LDP (Vale of Glamorgan, 2016) was carried out in 2016 which identified the potential for adverse impacts associated with implementing Policy MG10 related to air quality and recreation. The subsequent Appropriate Assessment of Policy MG10 concluded that '<i>as the site is located a considerable distance from any European sites (around 12km [from the Severn Estuary SPA/Ramsar site/SAC]), it is therefore considered to have no significant effects alone.</i>' In respect of in-combination effects, the Appropriate Assessment '<i>did not identify any in-combination effects in relation to air pollution, disturbance, water resources or water quality.</i>' The Vale of Glamorgan have also produced a Supplementary Planning Guidance document (The Vale of Glamorgan Local Development Plan Supplementary Planning Guidance: Cardiff Airport and Gateway Development Zone, December 2019) which includes provision to ensure '<i>a Preliminary Ecological Appraisal of the site to establish what further surveys and assessments will be required to inform the development.</i>' Policy MG10 was based on a Masterplan from 2006 (Cardiff Airport, 2006), and subsequently a new Masterplan has been developed. The 2040 Masterplan for the airport has been produced by the Welsh Government (Welsh Government, June 2019). HRA has not been carried out on the Masterplan at this stage. The Cardiff Airport Masterplan states that: '<i>We propose to support an integrated and sustainable low-carbon transport infrastructure. We will deliver increased choice for those who work at, visit and use the Airport; offering phased active travel links, electric bus infrastructure, electric bikes for hire, electric vehicle charging points and bus rapid transit links to the planned campus. In addition, a sustainable and long-term approach to development is envisaged, utilising solar technology, sustainable building materials and cleaner technologies.</i>' Although similar to the St Athan – Cardiff Airport Enterprise Zone' allocation within the LDP, the new Masterplan includes a revised larger boundary (to take account of a potential extended runway) and project projections (in terms of growth - the Masterplan forecast growth shows that passenger numbers could reach 2.5 million in the next 10 years rising to 3.3 million by 2040, whereas MG10 states that the Welsh Government is committed to re-establishing passenger trips to 2.5 million by 2023, therefore the 2006 Masterplan was based on around double the amount of passenger numbers as currently proposed in the</p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>2040 Masterplan). Given the early stages of the Masterplan, no projects have come forward at this time; however, consideration of the impacts identified in the LDP HRA will need to be given to any future development associated with Policy MG 10 or through the new Masterplan. This could include: air pollution as a result of additional flights and increased traffic flow of passengers to and from the airport; loss of land potentially suitable for use by foraging / roosting birds associated with the Severn Estuary SPA / Ramsar site as a result of the potential runway extension and its associated infrastructure; disturbance / displacement effects (noise / visual) upon foraging qualifying features associated with the Severn Estuary SPA / Ramsar site using land functionally linked to the Natura 2000 / Ramsar site (in particular over-wintering waders and waterfowl) associated with the operation of the airport, or as a result of construction activities from the airport expansion, including the potential runway extension and associated infrastructure; indirect effects such as increased recreational pressures on the region through additional tourism; potential impacts on water quality and resources as a result of new infrastructure associated with the airport expansion; and potential in-combination effects with other large-scale projects regionally / nationally. The 2006 Masterplan included an assessment of the local air quality as a result of projected airport travel, although the new Masterplan includes a revised lower projection and therefore potential reduction in air quality impacts, similar air quality assessments will be required at the project-level to ensure no adverse air quality impacts on Natura 2000 / Ramsar sites (alone or in-combination with other large-scale development). The NDF does not support any proposals associated with Cardiff Airport where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation.</p> <p><u>Avoidance / Mitigation (Cardiff Airport)</u></p> <p>Whilst the LDP concludes no adverse effect on Natura 2000 / Ramsar sites (as a result of implementation of Policy MG10 within the LDP), given that the 2040 Masterplan includes a revised boundary and project projections, the conclusion of the LDP cannot be solely relied upon to conclude no adverse effects of Policy 10 of the NDF. However, given the probable size and scale of future development at the airport, project-level HRA is likely to be required (to comply with PPW 10) which would identify any other impacts not considered in the LDP HRA (such as those associated with the runway extension). Infrastructure development associated with Cardiff Airport would also be the requirements of HRA at the appropriate planning stage. Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000 / Ramsar sites, the following measures must be adhered to when future development at the Airport and its associated infrastructure come forward (either as part of Policy MG10 or the new Masterplan) to ensure no adverse impact on the integrity of Natura 2000 / Ramsar sites.</p> <p><i>Avoidance / mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Projects related to the expansion of Cardiff Airport must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW 10 and TAN 5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed necessary during project level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be 	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>withdrawn or amended and re-assessed or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Cardiff Airport where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation.</p> <ul style="list-style-type: none"> • Policy 10 states that “<i>The Welsh Government will support appropriate development which can enhance international connectivity and can be accommodated within statutory climate change targets and carbon budgets. The Welsh Government acknowledges that the statutory climate change framework implies action to tackle all sources of greenhouse gas emissions, including international travel and freight. The Welsh Government supports international efforts to reduce emissions from international aviation and shipping. The net Welsh emissions account includes Wales’ share of emissions from international aviation and shipping. Decisions associated with international aviation and shipping will therefore need to demonstrate how they can be accommodated within the statutory climate change targets and carbon budgets.</i>” This requirement to demonstrate that climate change targets and carbon budgets will be met will ensure that the Welsh emissions do not result in potential indirect impacts from greenhouse gases on the integrity of the Natura 2000 / Ramsar sites. However cumulative emissions from sources outside of Wales must be considered. • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of Cardiff Airport will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. The wording within Policy 10 also acknowledges that ‘<i>the NDF and the Wales Transport Strategy should be used together and an integrated approach taken to their implementation at the regional and local levels. This is critical to ensure new development is built in sustainable locations and supported by the active travel and public transport infrastructure... ensuring average levels of airborne pollution continue to be reduced.</i>’ This approach would ensure average levels of airborne pollution are reduced or at least minimised. Any future development at the airport will need to ensure that it complies with any future air quality targets associated with the Transport Plan in order to ensure no adverse effects on the integrity of Natura 2000 / Ramsar sites. <p>Holyhead</p> <p>Holyhead Port is a major national asset and an important international gateway for freight and passengers. The Welsh Government recognises the importance of Holyhead Port to Anglesey and to Wales through Policy P10. Whilst P10 does not explicitly encourage new development at Holyhead there is a potential that, in order for Holyhead’s important international connectivity role, as well as its role in the regional and national economy, to be maintained over the course of the NDF period, new development may be required. Any new development at Holyhead, or an expansion in its capacity, could pose a risk to the integrity of Natura 2000 / Ramsar sites.</p> <p><u>Impacts (Holyhead)</u></p> <p>The island of Anglesey is surrounded by Natura 2000 / Ramsar sites, including Anglesey Terns SPA; North Anglesey Marine SAC; Holy Island Coast SPA/SAC and the Menai Strait and Conwy Bay SAC, all of which could be impacted by future growth at the Port. New port related development also has the potential to affect multiple Natura 2000 / Ramsar sites further afield,</p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>including sites designated for marine mammals such as West Wales Marine SAC; Bristol Channel Approaches SAC; Lleyn Peninsula and the Sarnau SAC; Cardigan Bay SAC; and Pembrokeshire Marine SAC.</p> <p>Ecological assessment (including HRA Screening) has already been carried out for a Draft Harbour Revisions Order (HRO) for the potential expansion of Holyhead Port. Potential impacts identified included: disturbance/displacement effects (noise/visual/vibration) upon breeding and/or foraging qualifying features of the marine sites (including harbour porpoise and breeding terns); loss/damage to sensitive marine and coastal habitats; potential impacts to foraging and/or breeding habitats associated with changes to coastal processes; potential increases in air pollution through construction activities and/or increased boat traffic; potential impacts on water quality (such as pollution within the marine environment from construction activities, dredging, or increased boat traffic); indirect effects such as increased recreational pressures on the coastline through additional tourism to the area; and potential in-combination effects with other large-scale coastal projects regionally / nationally. The HRA Screening (Royal Haskoning, June 2019) identified the potential for likely significant effects on marine mammals (including Harbour porpoise, bottlenose dolphin and grey seal). Further Appropriate Assessment for these qualifying species is currently being carried out.</p> <p><i>Avoidance / Mitigation (Holyhead)</i></p> <p>Whilst the HRA of the HRO will include mitigation measures to ensure no adverse effect on Natura 2000 / Ramsar sites, other projects at the port could come forward as a result of Policy 10 during the NDF plan period, not related to the HRO; therefore, the conclusion of the HRO HRA cannot be solely relied upon to conclude no adverse effects of Policy 10 of the NDF. However, given the likely size of any future development at the port, project-level HRA is likely to be required (to comply with PPW 10) which would identify any other impacts not considered in the HRO HRA. Infrastructure development associated with Holyhead would also be subject to the requirements of HRA at the appropriate planning stage. Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000 / Ramsar sites, the following measures must be adhered to (when future port related projects come forward) to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites.</p> <p><i>Avoidance / mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Projects related to the expansion of Holyhead Port (including the HRO referred to above) must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW 10 and TAN 5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed necessary during project-level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn or amended and re-assessed or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Holyhead Port where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. 	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<ul style="list-style-type: none"> • Policy 10 states that “<i>The Welsh Government will support appropriate development which can enhance international connectivity and can be accommodated within statutory climate change targets and carbon budgets. The Welsh Government acknowledges that the statutory climate change framework implies action to tackle all sources of greenhouse gas emissions, including international travel and freight. The Welsh Government supports international efforts to reduce emissions from international aviation and shipping. The net Welsh emissions account includes Wales’ share of emissions from international aviation and shipping. Decisions associated with international aviation and shipping will therefore need to demonstrate how they can be accommodated within the statutory climate change targets and carbon budgets.</i>” This requirement to demonstrate that climate change targets and carbon budgets will be met will ensure that the Welsh emission do not result in potential indirect impacts from greenhouse gases on the integrity of the Natura 2000 / Ramsar sites. However cumulative emissions from sources outside of Wales must be considered. • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of the Port will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p>Haven Waterway</p> <p>Policy P10 recognises the importance of Haven Waterway for the regional economy, as well as Wales’ national economy, and its role in international connectivity. P10 seeks to ensure that these important roles of Haven Waterway are maintained over the NDF period. Whilst this does not necessarily mean that new development, or an expansion of Haven Waterway’s capacity, would take place, there is potential that such development could occur. Any new development at Haven Waterway, or an expansion in its capacity, could pose a risk to the integrity of Natura 2000 / Ramsar sites.</p> <p><u>Impacts (Haven Waterway)</u></p> <p>Although the Haven Waterway is an existing port with long-established industries and a key location for the UK’s energy supplies, it also forms part of the West Wales Marine SAC and Pembrokeshire Marine SAC. Any expansion of the port has the potential to impact on the adjacent SACs, as well as Natura 2000 / Ramsar sites further afield, including sites designated for marine mammals such as Bristol Channel Approaches SAC; Lleyn Peninsula and the Sarnau SAC; and Cardigan Bay SAC.</p> <p>Haven Waterway was included as an allocation within the Pembrokeshire Local Development Plan (Pembrokeshire Council, 2013). Policy SP2 (Port and Energy related development) within the LDP includes development at the Ports of Milford Haven and Fishguard. The policy states that development will be permitted for port related facilities and infrastructure, including energy related development. A HRA of the LDP was carried out in 2012 (Pembrokeshire Council, 2012). Potential impacts identified included: disturbance/displacement effects (noise/visual/vibration) upon breeding and/or foraging qualifying features of the marine sites; loss/damage to sensitive marine and coastal habitats (in particular the adjacent SACs); potential impacts to foraging and/or breeding habitats associated with changes to coastal processes; potential increases in air pollution through construction activities and/or increased boat traffic; potential impacts on water quality (such as pollution within the marine environment from construction activities, dredging or increased boat traffic); indirect effects such as increased recreational</p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>pressures on the coastline through additional tourism to the area; and potential in-combination effects with other large-scale coastal projects regionally / nationally. The HRA of the LDP concluded that implementation of Policy SP2 would have no impacts on Natura 2000 / Ramsar sites, assuming project-level HRA was undertaken to identify and mitigate any potential adverse impacts. Policy SP2 states that <i>'Individual proposals coming forward under policy SP2 will require project level Habitats Regulation Assessment to consider their likely significant effects on features of the SAC.'</i> This is achieved through Policy GN36 within the LDP which states that <i>'Development Proposals with potential for adverse effect on internationally or nationally important sites will require detailed assessment before progressing. Specifically if any development proposal is likely to have a significant effect on a European protected site or species it shall be subject to an Appropriate Assessment of the implications in relation to the site's conservation objectives.'</i> A planning application associated with the Port of Milford Haven Master Plan is also currently in the planning system. The Preliminary Ecological Appraisal for the Masterplan (RSK, 2018) identifies that project-level HRA Screening will be carried out once the details of the Masterplan have been finalised.</p> <p><u>Avoidance / Mitigation (Haven Waterway)</u></p> <p>Whilst the HRA of the LDP concludes no adverse effect on Natura 2000 / Ramsar sites (with mitigation in place), other projects at the port could come forward as a result of Policy 10 during the NDF plan period, outside of the boundary of Policy SP2 within the LDP; therefore, the conclusion of the LDP HRA cannot be solely relied upon to conclude no adverse effects of Policy 10 of the NDF. However, given the likely size of future development at the port, project-level HRA is likely to be required (to comply with PPW 10) which would identify any other impacts not considered in the LDP HRA. Infrastructure development associated with Haven Waterway would also be subject to requirements of HRA at the appropriate planning stage. Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000 / Ramsar sites, the following measures must be adhered to (when future port related projects come forward) to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites.</p> <p><i>Avoidance / mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Projects related to development at Haven Waterway must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW 10 and TAN 5 and Policy GN36 of the Pembrokeshire LDP). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed necessary during project level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn or amended and re-assessed or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Haven Waterway where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. <p>Policy 10 states that <i>"The Welsh Government will support appropriate development which can enhance international connectivity and can be accommodated within statutory climate change targets and carbon budgets. The Welsh Government acknowledges that the statutory climate change framework implies action to tackle all sources of greenhouse</i></p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p><i>gas emissions, including international travel and freight. The Welsh Government supports international efforts to reduce emissions from international aviation and shipping. The net Welsh emissions account includes Wales' share of emissions from international aviation and shipping. Decisions associated with international aviation and shipping will therefore need to demonstrate how they can be accommodated within the statutory climate change targets and carbon budgets."</i> This requirement to demonstrate that climate change targets and carbon budgets will be met will ensure that the Welsh emissions do not result in potential indirect impacts from greenhouse gases on the integrity of the Natura 2000 / Ramsar sites. However cumulative emissions from sources outside of Wales must be considered.</p> <ul style="list-style-type: none"> • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of the Port will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p>Fishguard Port</p> <p>The Welsh Government recognises the importance of the port as an important international gateway for freight and passengers in South-West Wales and provides a key roll-on roll-off ferry link. It has a strategically important role in connecting the mainland of Europe, the UK and Wales with the Republic of Ireland. It also plays an important role in the regional and national economies. Policy P10 seeks to ensure that these important roles of the port are maintained over the NDF period. Whilst Policy P10 does not explicitly encourage new development at the port, or an expansion of its capacity, there is potential that such development may be needed in order to maintain the Port's important connectivity and economic roles. Any new development at Fishguard Port, or an expansion in its capacity, could pose a risk to the integrity of Natura 2000 / Ramsar sites.</p> <p><u>Impacts (Fishguard Port)</u></p> <p>Although Fishguard is a working Port, it also forms part of the West Wales Marine SAC. Any expansion of the port has the potential to impact on the adjacent SAC, as well as Natura 2000 / Ramsar sites further afield, including sites designated for marine mammals such as Bristol Channel Approaches SAC; Pembrokeshire Marine SAC, Lleyn Peninsula and the Sarnau SAC; and Cardigan Bay SAC</p> <p>Fishguard is also included under Policy SP2 within the Pembrokeshire Local Development Plan (Pembrokeshire Council, 2013) linked to Milford Haven (see above). Potential impacts of future development of the Port identified include: disturbance / displacement effects (noise/visual/vibration) upon breeding and/or foraging qualifying features of the marine sites; loss / damage to sensitive marine and coastal habitats (in particular the adjacent SAC); potential impacts to foraging and/or breeding habitats associated with changes to coastal processes; potential increases in air pollution through construction activities and/or increased boat traffic; potential impacts on water quality (such as pollution within the marine environment from construction activities, dredging or increased boat traffic); indirect effects such as increased recreational pressures on the coastline through additional tourism to the area; and potential in-combination effects with other large-scale coastal projects regionally / nationally. As stated above, the HRA of the LDP concluded that implementation of Policy SP2 would</p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>have no impacts on Natura 2000 / Ramsar sites, assuming project-level HRA was undertaken to identify and mitigate any potential adverse impacts.</p> <p><u>Avoidance / Mitigation (Fishguard Port)</u></p> <p>Whilst the HRA of the LDP concludes no adverse effect on Natura 2000 / Ramsar sites (with mitigation in place), other projects at the port could come forward as a result of Policy 10 during the NDF plan period, outside of the boundary of Policy SP2 within the LDP; therefore, the conclusion of the LDP HRA cannot be solely relied upon to conclude no adverse effects of Policy 10 of the NDF. However, given the likely size of future development at the port, project-level HRA is likely to be required (to comply with PPW 10) which would identify any other impacts not considered in the LDP HRA. Infrastructure development associated with Fishguard Port would also be subject to the requirements of HRA at the appropriate planning stage. Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000 / Ramsar sites, the following measures must be adhered to (when future port related projects come forward) to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites.</p> <p><i>Avoidance / mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Projects related to development at Fishguard Port must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW 10 and TAN 5 and Policy GN36 of the Pembrokeshire LDP). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed necessary during project level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn or amended and re-assessed or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Fishguard Port where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. • Policy 10 states that “<i>The Welsh Government will support appropriate development which can enhance international connectivity and can be accommodated within statutory climate change targets and carbon budgets. The Welsh Government acknowledges that the statutory climate change framework implies action to tackle all sources of greenhouse gas emissions, including international travel and freight. The Welsh Government supports international efforts to reduce emissions from international aviation and shipping. The net Welsh emissions account includes Wales’ share of emissions from international aviation and shipping. Decisions associated with international aviation and shipping will therefore need to demonstrate how they can be accommodated within the statutory climate change targets and carbon budgets.</i>” This requirement to demonstrate that climate change targets and carbon budgets will be met will ensure that the Welsh emissions do not result in potential indirect impacts from greenhouse gases on the integrity of the Natura 2000 / Ramsar sites. However cumulative emissions from sources outside of Wales must be considered. 	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of the Port will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW 10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P11 - National Connectivity	<p>This policy sets out the Welsh Government's support for investment in improving national connectivity. The Welsh Government aims to reduce the need to travel, particularly by private vehicles, and support a modal shift to walking, cycling and public transport (a fundamental principle of PPW 10). Broadly, this policy will provide positive environmental outcomes through reducing air pollution from car emissions and focusing new infrastructure and transport links within existing urban locations. However, given that the exact details of such improvements are not currently known at the high-level of the NDF, there is still the potential for adverse impacts on Natura 2000 / Ramsar sites.</p> <p><u>Impacts</u></p> <p>Whilst the majority of upgrades to the cycle, road and rail routes would be linked to the existing network (for example, improving and linking cycle routes and widening roads), the requirement for larger infrastructure, such as new cycle paths, roads and railway lines could lead to potential impacts on Natura 2000 / Ramsar sites should they be located within or close to such areas.</p> <p>The policy states that '<i>planning authorities must ensure that, where appropriate, new development contributes towards the improvement and development of the National Cycle Network and key links to and from it.</i>' The National Cycle Network crosses large areas of Wales covering 1,690 miles (64% of the network is on-road and 36% is on traffic-free paths) and by its nature many traffic-free cycle routes are located in coastal areas and in the vicinity of Natura 2000 / Ramsar sites. Potential impacts associated with the improvement and development of the National Cycle Network or upgrades to link into it could include (but are not limited to): disturbance / displacement of qualifying species (in particular birds in coastal areas or using functionally linked land) if new routes are opened up adjacent to Natura 2000 / Ramsar sites; potential direct loss of functionally linked land under the footprint of schemes adjacent to coastal areas; and potential severance of habitat links from new linear features in the landscape. There is also the potential to open up previously less accessible areas to new visitors and as such increase the potential for recreational pressure on Natura 2000 / Ramsar sites.</p> <p>Although the exact details of the upgrades to the rail network are not known at this stage, the Welsh Government has produced a report ('<i>A Railway for Wales: Meeting the needs of future generations</i> (Welsh Government, 2019c)) which sets out a Strategic Railway Development Programme. This includes improving existing services, station upgrades and better timetabling across Wales. Station improvements, which would generally be focused in urban locations, are unlikely to lead to</p>	No adverse effect on integrity of Natura 2000 / Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>adverse impacts on Natura 2000 / Ramsar sites. The main potential impact of rail improvements would be associated with potential increases in recreation pressure if access to coastal areas, for example, are improved. Works associated with the electrification of the rail network also have the potential to cause temporary disturbance / displacement and/or water quality impacts if located in the vicinity of Natura 2000 / Ramsar sites. The construction of new track, if required, also has the potential to cause disturbance / displacement of qualifying species (as a result of construction activities as well as the operation of the new lines); potential direct loss of functionally linked land under the footprint of new rail routes; and potential severance of habitat links from new linear features in the landscape.</p> <p>Whilst the details of road improvements are not known at this stage, the Welsh Government maintains its commitment to tackling congestion on the trunk road network and the Pinch Point Programme identifies areas of congestion. Potential impacts associated with new road building and improvement projects could include (but are not limited to): disturbance / displacement to qualifying features if such development falls in the vicinity of Natura 2000 / Ramsar sites; water and air pollution from construction activities, and potential increases in recreational pressure if new roads open up access to previously undisturbed areas. There is also the potential to open up previously less accessible areas to new visitors and as such increase the potential for recreational pressure on Natura 2000 / Ramsar sites.</p> <p><u>Avoidance / Mitigation</u></p> <p>The main focus of the policy is to reduce the need to travel and thus implementation in itself could potentially lead to improvements in air quality which would bring benefits to Natura 2000 / Ramsar sites. However, where there is the potential to impact Natura 2000 / Ramsar sites through other indirect pathways such as recreational pressure, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when preparing lower-tier plans and projects to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites as a result of policy implementation:</p> <p><i>Avoidance / mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Transport policies developed through lower-tier plans (including allocating land for new transport links) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW 10 and TAN 5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan / project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn or amended and re-assessed or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. 	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects associated with this policy will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. When using the Active Travel Maps to determine the location of new cycle routes or highlight areas of improvement, any assessments must fully consider the implication of such proposals on Natura 2000 / Ramsar site to ensure no adverse effects on the integrity of Natura 2000 / Ramsar sites. (In particular, the implications of human disturbance on sensitive habitats and qualifying species and routing new cycle paths through Natura 2000 / Ramsar sites / land functionally linked to Natura 2000 / Ramsar sites. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW 10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P12 – Regional Connectivity	<p>The Welsh Government will work with Transport for Wales, local authorities, operators and partners to support the delivery of improvements to the bus and metro system as well as helping to implement the Active Travel Act and supporting suitable fuelling infrastructure for ultra-low emission vehicles.</p> <p>This policy sets out the Welsh Government’s support for investment in improving regional connectivity. The Welsh Government aims to prioritise improving and integrating active travel and public transport to support sustainable growth and regeneration in urban areas, and in rural areas prioritise supporting the uptake of zero/ultralow emission vehicles and diversifying and sustaining local bus services. Broadly, this policy will provide positive environmental outcomes through reducing air pollution from car emissions and focusing new transport links within existing infrastructure. However, given that the exact details of such improvements are not currently known at this high-level stage, there is still the potential for adverse impacts on Natura 2000 / Ramsar sites.</p> <p><u>Impacts</u></p> <p>The Active Travel Act aims to create a comprehensive network of walking and cycling routes that connect places that people need to get to for everyday journeys. Improved walking and cycling routes within urban locations are unlikely to lead to adverse impacts on Natura 2000 / Ramsar sites. For those in more rural areas and coastal areas, the potential for impacts is greater, and could include (but are not limited to): disturbance/ displacement of qualifying species (in particular birds in coastal areas or using functionally linked land) if new routes are opened up adjacent to Natura 2000 / Ramsar site; potential direct loss of functionally linked land under the footprint of schemes adjacent to coastal areas; and potential severance or fragmentation of habitat links from new linear features in the landscape. There is also the potential to open up previously less accessible areas to new visitors, and as such increase the potential for recreational pressure on Natura 2000 / Ramsar sites.</p>	No adverse effect on integrity of Natura 2000 / Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>Improvement of the legislative framework for how local bus services are planned and delivered proposed by this policy are considered unlikely to lead to adverse impacts on Natura 2000 / Ramsar sites. The policy also supports development of the South East Metro, South West Metro and North Wales Metro to create new integrated transport systems that provide faster, more frequent and joined-up services using trains, buses and light rail. Whilst the exact details of these schemes are not currently known, the majority of the improvement works would be located within urban locations, and as such are unlikely to lead to adverse impacts on Natura 2000 / Ramsar sites. The main impact which could arise from these developments would be associated with potential increases in recreational pressure if the improvements open up areas previously less accessible to new visitors (including coastal designated sites).</p> <p>The growth in zero / ultralow emission vehicles will provide positive environmental outcomes through reducing air pollution from car emissions. New fuelling infrastructure would be small scale and generally linked to existing development such as car parks and housing developments, and therefore, the roll out of suitable fuelling infrastructure to facilitate the adoption of zero / ultralow emission vehicles is unlikely to lead to adverse impacts on Natura 2000 / Ramsar sites.</p> <p><u>Mitigation</u></p> <p>Similarly, to Policy P11 (National Connectivity), the main focus of the policy is to reduce the need to travel and thus implementation in itself could potentially lead to improvements in air quality which would bring benefits to Natura 2000 / Ramsar sites. However, where there is the potential to impact Natura 2000 / Ramsar sites through other indirect pathways such as recreational pressure, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when preparing lower-tier plans and projects to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites as a result of policy implementation:</p> <p><i>Avoidance / mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Transport policies developed through lower-tier plans (including allocating land for new transport links) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan / project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. 	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects associated with this policy will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P13 – Supporting Digital Communications	<p>The Welsh Government supports the provision of digital communications infrastructure and services across Wales.</p> <p><u>Impacts</u></p> <p>Whilst the majority of infrastructure for digital communications (including mobile and broadband telecommunications) would be small scale and generally linked to existing development (for example, installing cabling along road verges and attaching phone masts to existing structures) nevertheless, the policy does recognise the need to improve digital communication in rural areas, and therefore there is the potential to impact on Natura 2000 / Ramsar sites in more remote locations. The Welsh Government recognises this and states that ‘while the Welsh Government supports the provision of new and improved digital communications infrastructure across Wales and recognises that infrastructure in rural areas should be carefully planned to mitigate any environmental impact on sensitive or designated landscapes.’</p> <p>Although the exact details of new digital communications are not known, potential impacts are likely to be largely restricted to the short-term and associated with the construction phase of development. Potential impacts during construction could include (but are not limited to): disturbance/ displacement of qualifying features (for example, disturbance/ displacement of qualifying bird species if locating new infrastructure in or near to coastal or upland SPAs /Ramsar sites); damage to, or loss of, important habitats associated with Ramsar sites / SACs (for example, permanent loss of habitat under the footprint of new structures, or damage if laying cable across watercourses, in upland areas or through other SAC /Ramsar site habitats); hydrological effects (for example, the digging of cable trenches leading to the inadvertent drainage, and thus drying out, of SAC/Ramsar site wetland habitats); and potential severance or fragmentation of habitat links from new linear features in the landscape if new above ground wiring is required.</p> <p><u>Mitigation</u></p> <p>Generally, the installation of infrastructure for mobile technology is unlikely to adversely affect Natura 2000 / Ramsar sites (due to the temporary and short-term nature of such infrastructure works and likely urban settings). However, where sensitive habitats and species could be present, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites as a result of policy implementation:</p>	No adverse effect on integrity of Natura 2000 / Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p><i>Measures applicable to more than one policy (refer to Table 6): A, B, D C, F, G</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
P14 – Planning in Mobile Action Zones	<p>This policy sets out a commitment to increase mobile coverage and will identify Mobile Action Zones across Wales, showing locations where there is little or no mobile telecommunications coverage.</p> <p><u>Impacts</u></p> <p>Whilst the majority of infrastructure for mobile technology would be of small scale and generally linked to existing development (for example, installing cabling along road verges), the requirement for larger infrastructure, such as mobile phone masts, could lead to potential impacts on Natura 2000 / Ramsar sites, should they be located within or close to such areas. Although the exact details of such Schemes are not known, potential impacts are likely to be largely restricted to the short-term and associated with the construction phase of development. Potential impacts during construction could include (but are not limited to): disturbance to qualifying features (for example, disturbance/ displacement of qualifying bird species if locating new infrastructure in or near to coastal or upland SPAs / Ramsar sites); damage to, or loss of, important habitats associated with Ramsar sites / SACs (for example, permanent loss of habitat under the footprint of new structures, or damage if laying cable across watercourses or through other SAC / Ramsar site habitats, such as upland moorland); hydrological effects (for example, the digging of cable trenches leading to the inadvertent drainage, and thus drying out, of SAC/Ramsar site wetland habitats) and potential severance or fragmentation of habitat links from new linear features in the landscape if new above ground wiring is required.</p> <p><u>Mitigation</u></p> <p>Generally, the installation of infrastructure for mobile technology is unlikely to adversely affect Natura 2000 / Ramsar sites (due to the temporary and short-term nature of such infrastructure works, and likely urban settings). However, where there is</p>	No adverse effect on integrity of Natura 2000/ Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>a need to expand mobile infrastructure within Mobile Action Zones in areas known to support sensitive habitats and species, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when implementing this policy to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A, B, C, D, F, G</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan / project level. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P15 – National Forest	<p>The exact location of a National Forest for Wales is not currently known; however, the supporting text for Policy 15 states that ‘The Welsh Government has a target to increase woodland cover in Wales by at least 2,000 hectares per annum from 2020.’</p> <p><u>Impacts</u></p> <p>The creation of a National Forest for Wales is considered to be a positive policy, with many environmental benefits; however, if areas of forest are planted in unsuitable locations, the policy could potentially lead to detrimental impacts on existing habitats and species associated with Natura 2000 / Ramsar sites, such as open habitats like heathland or grassland, where woodland cover is not beneficial. Whilst planting woodland in such habitats within Natura 2000 / Ramsar sites would clearly be contrary to their conservation objectives, it is also possible that planting woodland adjacent to such sites could also have adverse effects, especially if species from those sites depend upon similarly-open habitats beyond the site boundaries (e.g. for foraging or roosting). Windblown seeds from new woodland can also result in regeneration that becomes a management problem on nearby Natura 2000 / Ramsar sites (most notably on sites where heathland or wetland habitats are qualifying features). Planting woodland adjacent to these sites could also provide cover for predators of the qualifying species (in particular ground nesting birds) or could potentially affect the hydrology of the landscape (in particular groundwater dependant ecosystems), which could adversely affect wetland sites. Increasing the number of visitors to areas of new woodland planting could also have detrimental impacts associated with recreational pressure (such as disturbance/</p>	No adverse effect on integrity of Natura 2000/ Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>displacement from increased human presence and dog walkers). Depending on the size and location of the new forest, there is also potential for the woodland to break or fragment existing habitat links.</p> <p><u>Avoidance/Mitigation</u></p> <p>It is clearly important to ensure that sites selected to support the delivery of this policy are not already designated for the presence of other (non-woodland) habitats which would be compromised by such planting (e.g. open grassland or heathland sites). Where sensitive habitats and species could be present, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites as a result of policy implementation:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A, B, C, D, E, F, G</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies and/or projects developed through lower-tier plans (including allocating land for new woodland) must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P17 – Renewable and Low Carbon Energy and Associated Infrastructure	<p>The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. Although the exact details of renewable energy technology projects are not outlined within the NDF; the Welsh Government has already identified a number of Pre-Assessed Areas (PAAs) for Wind Energy development across Wales (refer to Appendix B, Figure 1). A review of these areas in relation to Natura 2000 / Ramsar sites has been undertaken to determine the potential implications of new wind development within the PAAs. Appendix B (Table A) sets out the iterative process by which the PAAs have been identified and refined.</p> <p><u>Impacts</u></p> <p>Appendix B (Table B) outlines the potential impacts associated with each of the PAAs and the Natura 2000 / Ramsar sites which could potentially be impacted by future wind development within them. The table also includes a list of avoidance / mitigation measures (from Table 6) which must be considered when future projects come forward in each of the PAAs. The types of potential impacts identified include (but are not limited to): mortality as a result of collision with turbine blades or associated infrastructure (in particular impacts on upland raptors and waders, as well as bats), disturbance/ displacement of</p>	No adverse effect on integrity of Natura 2000/ Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>qualifying species, loss/ damage to sensitive habitat under the footprint of development and infrastructure (in particular sensitive upland habitats in more rural locations), potential for the new turbines or track to break or fragment existing habitat links, and potential implications on water quality if sited near designated watercourses or groundwater dependant ecosystems. Although the locations or types of other renewable energy proposals are not yet known, one or more of the potential impacts outlined here could also be relevant to other renewable energy projects.</p> <p><u>Avoidance/ Mitigation</u></p> <p>Although the policy states that <i>'there is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18'</i>. The policy also includes wording aimed at the protection of the wider landscape and environment: <i>'Applications for large scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment.'</i> For large-scale renewable projects which qualify as DNSs, they must also ensure that they comply with criteria 3 of Policy 18 before they can be permitted: <i>'There are no adverse impacts on international and national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species.'</i></p> <p>The process of refinement of the PAAs has ensured that they largely avoid not only Natura 2000 / Ramsar sites but also other designated areas, including National Parks, SSSIs and AONBs; which often support species, particularly birds and bats that are protected under the Habitats Regulations, even if the individuals are not directly associated with a particular designated site. Thus, potential for adverse impacts has been greatly reduced through the refinement process. Although a number of the Pre-Assessed Areas still include Natura 2000 / Ramsar sites, it is very unlikely that any wind development would be consented within or close to internationally designated sites. It is important to note that whilst the Pre-Assessed Areas for Wind Energy are designed to focus renewables development in 'lower-risk' parts of Wales, that does not entirely preclude wind (or any other renewable energy development elsewhere). Clearly any such development outside of the Pre-Assessed Wind Energy Areas will be harder to justify, especially if located closer to Natura 2000 / Ramsar sites, but that does not mean such proposals cannot be consented. Therefore, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites as a result of policy implementation:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A, B, C, D, F, G</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The assessment undertaken in Appendix B for the Pre-Assessed Wind Area must be used to guide the locations of future renewable energy projects in Wales. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development of renewable energy projects can be delivered at the plan/ project level. The NDF does not support any 	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.</p> <ul style="list-style-type: none"> Large-scale renewable projects, which qualify as DNSs, must ensure that they comply with criteria 3 of Policy 18 before they can be permitted. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
P20 – National Growth Area - Wrexham and Deeside	<p>The Main focus for growth and regeneration in the North region – Wrexham and Deeside.</p> <p><u>Impacts</u></p> <p>This policy supports the development of a Strategic Development Plan for the region to ensure coordinated action on Housing, economic growth and connectivity infrastructure. Delivery of such a plan has the potential to impact on Natura 2000 / Ramsar sites which are numerous in this part of Wales. In particular, the Deeside and Buckley Newt Sites SAC, the Johnstown Newt Site SAC, Midland Meres and Mosses Ramsar site, the River Dee and Bala Lake SAC, and The Dee Estuary SAC/SPA/Ramsar site.</p> <p>As there is no spatial element to the policy, it is not possible to determine exactly which Natura 2000/ Ramsar sites could be affected by increased growth in the region, however, it is likely that a significant proportion of land allocated within future low-tier plans in the region could be on land located between Mold, Wrexham and Chester. Development in these areas has the potential to adversely affect the Deeside and Buckley Newt Sites SAC and the Johnstown Newt Sites SAC. Given the proximity of the Dee Estuary SAC / Ramsar site/SPA, increased growth in coastal areas also has the potential to impact on qualifying habitats and species of these sites. Potential impacts of implementing this policy could include (but are not limited to): loss of ponds and other supporting habitat associated with the Newt SACs, fragmentation of habitats, severance of connectivity between Newt SACs, potential road-related mortality, as well as impacts associated with water quality, and changes to hydrology in the vicinity of breeding ponds or other sensitive SAC habitats (such as the Midland Meres and Mosses Ramsar site), increased disturbance and damage to supporting habitats of the Newt SACs, as well as disturbance/displacement of qualifying bird species associated with The Dee Estuary SAC/SPA/Ramsar site, air pollution and recreational pressure from an increased population within the region.</p> <p><u>Avoidance/Mitigation</u></p> <p>The main focus of the policy is to encourage growth within existing urban locations, however, the Welsh Government recognises the environmental importance of the region and states that <i>'the management of natural resources and flooding and the protection and enhancement of areas of environmental and landscape importance should inform strategic decisions</i></p>	No adverse effect on integrity of Natura 2000 / Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p><i>on locations for growth and new infrastructure</i>. Flintshire Council have also produced Supplementary Planning Guidance (<i>Supplementary Planning Guidance 8a Great Crested Newt Mitigation Requirements (Adopted by Flintshire County Council, 23rd February 2018)</i>) to help inform future plan and/or project proposals in the region. Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when implementing this policy to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through the Strategic Development Plan / other lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan / project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. • Local Planning Authorities, Strategic Planning Panels and developers must utilise documents such as the Supplementary Planning Guidance 8a Great Crested Newt Mitigation Requirements (Flintshire County Council, 2018), or equivalent, to help inform future plan and/or project proposals to avoid adverse effects on the integrity of Natura 2000 / Ramsar sites. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
P21 – Regional Growth Area - North Wales Coastal Settlements	<p>The Welsh Government supports sustainable growth and regeneration in regionally important towns along the northern Coast. Holyhead, Caernarfon, Bangor, Llandudno, Colwyn Bay, Rhyl and Prestatyn will be a focus for managed growth and they have an important sub-regional role complementing the National Growth Area of Wrexham and Deeside. Strategic and Local Development Plans across the region should recognise the role of these places as a focus for housing, employment, tourism, public transport and key services.</p> <p><u>Impacts</u></p>	No adverse effect on integrity of Natura 2000 / Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>Although the policy highlights that the majority of development will be focused on more built-up areas, given the close proximity of a number of these settlements to coastal habitats there is still the potential for adverse effects on designated coastal areas. The policy also highlights the needs of rural communities should also be considered (in particular in relation to improved digital connectivity and opportunities to support the rural tourism industry). Such development has the potential to impact on Natura 2000 / Ramsar sites within the region, in particular, Liverpool Bay SPA, Lavan Sand SPA and Menai Strait and Conwy Bay SAC, as well as inland sites including Snowdonia SAC and smaller woodland and SACs designated for their bat interest.</p> <p>Increased growth in these coastal areas could lead to impacts upon Natura 2000 / Ramsar sites through potential disturbance / displacement of bird species associated with nearby SPA / Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations within lower-tier plans), severance of commuting routes for bats associated with SACs (i.e. reducing connectivity between the sites through loss of hedgerows/ woodland), or through other effects such as water / air pollution or increased disturbance as a result of recreational pressures from an increased population within the region.</p> <p><u>Avoidance/Mitigation</u></p> <p>The main focus of the policy is to encourage growth within existing urban locations; however, the Welsh Government supports sustainable and vibrant rural communities and supports sustainable, appropriate and proportionate economic growth in rural areas. Strategic Planning Panels and developers must adhere to the following measures when implementing this policy to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with</p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.	
P23 – North Wales Metro	<p>The Welsh Government supports development of the North Wales Metro.</p> <p><u>Impacts</u></p> <p>The development of the Metro could bring environmental benefits through reduced car usage and subsequent reduction in air and noise pollution, as well as the Welsh Governments support for the potential for these corridors to become green infrastructure. As the precise details of proposed growth in transport links between northwest England and Wales are currently unknown, there is the potential for impacts on Natura 2000/ Ramsar site located around the north west of England and Wales, including Liverpool Bay SPA, Lavan Sand SPA, Menai Strait and Conwy Bay SAC, and the Dee Estuary SAC/SPA/Ramsar site, as well as inland sites such as Snowdonia SAC, Deeside and Buckley Newt Sites SAC and Johnstown Newt SAC, and smaller woodland and SACs designated for bats. Potential impacts could include (but not limited to): loss of ponds and other supporting habitat associated with the Newt SACs; fragmentation of habitats, severance of connectivity between sites (particularly in relation to bat and newt SAC sites); potential road-related mortality; disturbance/displacement of qualifying bird species associated with SPAs/ Ramsar sites; as well as impacts associated with water quality, and changes to hydrology in the vicinity of breeding ponds or other sensitive SAC habitats, increased disturbance and damage to supporting habitats of the Newt SACs, as well as disturbance/displacement of qualifying bird species associated with SAC/SPA/Ramsar sites, air pollution and recreational pressure from an increased population within the region, especially if the new metro opens up areas not currently accessible by existing transport links.</p> <p><u>Avoidance/Mitigation</u></p> <p>Given the scale of the potential new Metro scheme, project-level HRA is likely to be required to comply with PPW 10. Development of the Metro would also be subject to the requirements of HRA at the appropriate planning stage. Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000/ Ramsar sites, Local Planning Authorities, Strategic Planning Panels and developers must also ensure that they adhere to the following measures when implementing this policy:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Transport policies developed through lower-tier plans (including allocating land for the Metro) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan / project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to 	No adverse effect on integrity of Natura 2000/ Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation.</p> <ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P24 – North West Wales and Energy	<p>The Welsh Government supports North West Wales as a location for new energy development and investment. Proposed developments associated with the Isle of Anglesey Energy Island Programme, Wylfa Newydd and Trawsfynydd will be supported as a means to create significant economic benefits for the area as well as generating renewable or low carbon energy.</p> <p><u>Impacts</u></p> <p>North West Wales (including the island of Anglesey) is surrounded by Natura 2000 / Ramsar sites, including four SPAs (Anglesey Terns, Lavan Sands, Puffin Island and Liverpool Bay) and the Menai Strait and Conwy Bay SAC. In addition, numerous smaller Natura 2000/ Ramsar sites are present around the coast and inland, including Anglesey Fens SAC/Anglesey and Llyn Fens Ramsar site, Abermenai to Aberffraw Dunes SAC, Snowdonia SAC and Holy Island Coast SAC/SPA. Any new energy developments in the region have the potential to affect multiple Natura 2000 / Ramsar sites in the region.</p> <p>Details of specific Natura 2000 / Ramsar sites that could be affected by this policy cannot be identified at this stage since there are no spatial elements to the policy (with the exception of Wylfa, see below), examples of impacts that could arise from new energy-related developments could include (but are not limited to): collision-related impacts on birds as a result of wind energy developments; loss of, or damage to sensitive habitats; disturbance/ displacement of qualifying marine and terrestrial qualifying species; hydrological and hydrogeological changes; and impacts on marine animals as a result of hot water outfalls from nuclear power stations. Solar developments tend to have lower environmental impacts; however, if sited incorrectly these could also have impact Natura 2000/Ramsar sites through habitat loss/ damage and potential effects on species from solar glare.</p> <p>Significant ecological assessment has already been carried out at the potential Wylfa Newydd nuclear power station site as part of the Development Consent Order (DCO) for the Project, which is currently at the Examination stage. Project-level HRA (Horizon Nuclear, 2018) identified the potential for adverse impacts on 22 Natura 2000/ Ramsar sites. The Appropriate</p>	No adverse effect on integrity of Natura 2000/ Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>Assessment included an extensive list of mitigation measures related to construction noise and visual effects (in the marine and terrestrial environment), air and water quality, protection of marine species from entrapment in the Cooling Water System, and recreational pressure. The HRA concluded that there would be no adverse impact on Natura 2000/ Ramsar sites (alone or in combination), assuming implementation of the mitigation measures.</p> <p><u>Avoidance/Mitigation</u></p> <p>Given the size and scale of new nuclear energy developments, any future nuclear proposals will fall under the requirements of DNSs or NSIP (depending on the energy output of the proposal). New wind and tidal energy developments are also likely to fall within the remit of DNS. The policy wording within P24 acknowledges that '<i>In determining any applications for nuclear energy generating stations in this region, consideration should be given to the need for further low carbon energy generation, their contribution towards the UK's energy mix and security, the economic benefits they would bring to the region and their impacts on the natural and historic environment</i>'. Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000 / Ramsar sites, Local Planning Authorities, Strategic Planning Panels and developers must also ensure that they adhere to the following measures when implementing this policy:</p> <p><i>Measures applicable to more than one policy (refer to Table6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000 / Ramsar sites cannot be avoided through mitigation. • Use the Pre-Assessed Wind Areas mapping (refer to Policy 17 and Appendix B) to identify potential future locations for wind energy development. • The HRA of the Wylfa Newydd nuclear power station site (Horizon Nuclear, 2018) identified the potential for adverse effects on Natura 2000 / Ramsar sites and mitigation measures have been proposed. These measures must be implemented in any future development at the site to ensure no adverse effect on the integrity of the Natura 2000 / Ramsar sites. 	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P25 – Regional Growth Areas – Mid-Wales	<p>The Welsh Government supports sustainable growth and development in a series of inter-connected towns across the region. The development in these Regional Growth Areas include: The Teifi Valley, including Cardigan, Newcastle Emlyn, Llandysul and Lampeter, Brecon and the Border, The Heart of Wales, including Llandrindod Wells and Builth Wells, Bro Hafren, including Welshpool and Newtown and Aberystwyth.</p> <p><u>Impacts</u></p> <p>This policy supports the development of Strategic and Local Development Plans to ensure a coordinated approach to supporting the region’s needs associated with housing, economic growth and connectivity infrastructure. Delivery of such a plan has the potential to impact on Natura 2000 / Ramsar sites which are numerous in this part of Wales. In particular, Cardigan Bay SAC, River Wye SAC, Cwm Doethie-Mynydd Mallaen SAC, Elan Valley Woodlands SAC, Elenydd Mallaen SPA, River Teifi SAC and Cors Caron SAC/Ramsar site.</p> <p>Although the potential for impacts from growth at Newtown and Llandrindod Wells are considered to be minimal (due to the distance of these towns from Natura 2000/ Ramsar sites); given that there is no spatial element associated with the policy, potential impacts cannot be ruled out. Potential impacts of implementing this policy could include (but are not limited to): disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations for development within lower-tier plans), loss or damage to sensitive SAC habitats, severance of commuting routes for bats associated with SACs (i.e. reducing connectivity between the sites through loss of hedgerows/ woodland), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region (in particular, an increase use of upland or coastal habitats).</p> <p><u>Avoidance/ Mitigation</u></p> <p>The main focus of the policy is to encourage growth within existing urban locations; however, the Welsh Government supports sustainable and vibrant rural communities and supports sustainable, appropriate and proportionate economic growth in rural areas. Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when implementing this policy to ensure no adverse impact on integrity of Natura 2000 / Ramsar sites:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000 / Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan / project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000 / Ramsar sites as a result of implementing this policy.</p>	
P26 – Growing the Mid Wales Economy	<p>The Welsh Government supports the growth and development of existing and new economic opportunities across Mid Wales. The policy states that Strategic and Local Development Plans should develop policies that support agriculture and land based traditional rural enterprises and provide a flexible framework to support the development of new, innovative and emerging technologies and sectors. The supporting text of the policy also includes reference to rural tourism (including developing coastal paths as well as other tourist facilities inland), renewable energy and improvements to rural communities which are widely distributed across mid-Wales.</p> <p><u>Impacts</u></p> <p>Future economic development in Mid Wales has the potential to impact Natura 2000/ Ramsar sites across the region. In particular, Cardigan Bay SAC, River Wye SAC, Cwm Doethie-Mynydd Mallaen SAC, Elan Valley Woodlands SAC, Elenydd Mallaen SPA, River Teifi SAC and Cors Caron SAC/Ramsar site. Given that there is no spatial element associated with the policy, potential impacts of implementing this policy could include (but are not limited to): disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations for economic development within lower-tier plans), impacts associated with renewable development (such as collision risk), loss or damage to sensitive SAC habitats, severance of commuting routes for bats associated with SACs (i.e. reducing connectivity between the sites through loss of hedgerows/ woodland), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from potential development of coastal paths as well as other tourist facilities inland promoted in the policy.</p> <p><u>Mitigation</u></p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>The main focus of the policy is to encourage growth within existing urban locations; however, the Welsh Government supports sustainable and vibrant rural communities and supports sustainable, appropriate and proportionate economic growth in rural areas. Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when implementing this policy to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • Use the Pre-Assessed Wind Areas mapping (refer to Policy 17 and Appendix B) to identify potential future locations for Wind Energy development. • As one of the aims of the policy is to support rural tourism. Future development in the tourism sector must consider the implications of increased recreational pressure on Natura 2000/ Ramsar sites (in particular through in-combination effects with other new development) to ensure no adverse effects on the integrity of such sites. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
P27 – Movement in Mid-Wales	<p>The Welsh Government will work with local and regional authorities to ensure transport investments improve accessibility across Mid Wales and strengthen cross-border transport links. The policy supports the development of sustainable infrastructure to reduce reliance on cars. The policy aims to ensure average levels of air and noise pollution are reduced or at least minimised. The overall aim is to reduce the need to travel, particularly by private vehicles, and support a modal shift to walking, cycling and public transport. The policy includes the development of Strategic and Local Development Plans to ensure support for growth and regeneration to maximise the potential opportunities arising from better regional connectivity.</p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p><u>Impacts</u></p> <p>Whilst the development of sustainable transport infrastructure could bring environmental benefits through reduced car usage and subsequent reduction in air and noise pollution, as the precise details of proposed growth in transport links within mid-Wales are currently unknown, there is the potential for impacts on Natura 2000/ Ramsar site within the region, including Cardigan Bay SAC, River Wye SAC, Cwm Doethie-Mynydd Mallaen SAC, Elan Valley Woodlands SAC, Elenydd Mallaen SPA, River Teifi SAC and Cors Caron SAC/Ramsar site. Potential impacts could include: disturbance/ displacement of qualifying species (in particular birds in upland areas or using functionally linked land) if new routes are opened up adjacent to Natura 2000/ Ramsar site; potential direct loss of functionally linked land under the footprint of schemes adjacent to sensitive areas; and potential severance of habitat links from new linear features in the landscape. There is also the potential to open up previously less accessible areas to new visitors, and as such increase the potential for recreational pressure on Natura 2000/ Ramsar sites (in particular, an increase use of upland habitats).</p> <p><u>Mitigation</u></p> <p>The main focus of the policy is to reduce the need to travel and thus implementation in itself could potentially lead to improvements in air quality which would bring benefits to Natura 2000/ Ramsar sites. However, where there is the potential to impact Natura 2000/ Ramsar sites through other indirect pathways such as recreational pressure, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when preparing lower-tier plans and projects to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites as a result of policy implementation:</p> <p><i>Avoidance/mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Transport policies developed through lower-tier plans (including allocating land for new transport links) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects associated with this policy will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. 	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
<p>P28 – National Growth Areas - Swansea Bay and Llanelli</p>	<p>Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. The policy supports the development of Local and Strategic Development Plans which recognise the National Growth Area as a focus on strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p><u>Impacts</u></p> <p>The Burry Inlet SPA/Ramsar site and Carmarthen Bay and Estuaries European Marine SAC (CBEEMS) lie on the coast to the south of Llanelli and west of Swansea. Crymlyn Bog SAC/Ramsar site lies on the eastern edge of Swansea, and Gower Commons SAC and Gower Ash Woods SAC are to the south west of Swansea. Focusing growth in and around existing urban centres is considered likely to minimise the potential for likely significant effects on designated sites; however, in the absence of any spatial element to the policy, the potential for Natura 2000/ Ramsar sites to be affected cannot be ruled out. Increased growth in these coastal areas could lead to impacts upon Natura 2000/ Ramsar sites through potential disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations for development within lower-tier plans), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region. Swansea Council has recently adopted a new Local Development Plan (Swansea Council, 2019). The HRA of the Plan (DTA Ecology, 2019) identified the potential for LSE associated with wastewater disposal, recreation and road effects and surface water contamination (in particular in relation water quality impacts on CBEEMS). The HRA recommended the incorporation of mitigation measures (as part of an appropriate assessment) to ensure no adverse effects to the integrity of the Natura 2000 sites identified.</p> <p><u>Avoidance/ Mitigation</u></p> <p>The main focus of the policy is to encourage growth within existing urban locations; however, the Welsh Government a supports sustainable and vibrant rural communities and supports sustainable, appropriate and proportionate economic growth in rural areas and highlights the environmental importance of the region. The supporting text states that ‘<i>the management of natural resources and flooding and the protection and enhancement of areas of environmental and landscape importance should inform strategic decisions on locations for growth and new infrastructure</i>’. Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when implementing this policy to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p>	<p>No adverse effect on integrity of Natura 2000/ Ramsar sites</p>

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • Ensure mitigation measures set out in the HRA of Swansea Council LDP are adhered to when projects which come forward as a result of implementation of this policy, in particular mitigation measures to avoid water quality impacts on the CBEEMS. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
P29 – Regional Growth Areas – Carmarthen and the Haven Towns	<p>The Welsh Government supports sustainable growth and regeneration in Carmarthen and the Pembrokeshire Haven Towns (Haverfordwest, Milford Haven, Pembroke and Pembroke Dock). These areas will be a focus for managed growth, reflecting their important sub-regional functions and strong links to the National Growth Area of Swansea Bay and Llanelli. The policy supports the development of a Strategic Development Plan for the region which focus on the roles of these places as a focus for housing, employment, tourism, public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth.</p> <p><u>Impacts</u></p> <p>The Haven Towns are located along the Cleddau Estuary and Milford Haven (which form part of the Pembrokeshire Marine SAC). Carmarthen lies alongside the River Tywi SAC (with the Carmarthen Bay and Estuaries SAC/Marine site to the south) and Northern Cardigan Bay SPA. Growth in all of these areas has the potential to impact upon Natura 2000/ Ramsar sites. Focusing growth in and around existing urban centres is considered likely to minimise the potential for adverse effects on designated sites; however, in the absence of a spatial element to the policy, the potential for Natura 2000/ Ramsar sites to be affected cannot be ruled out. Increased growth in these areas could lead to impacts upon Natura 2000/ Ramsar sites through disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked</p>	No adverse effect on integrity of Natura 2000/ Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>land under the footprint of allocations for development within lower-tier plans), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region.</p> <p><u>Avoidance/ Mitigation</u></p> <p>The main focus of the policy is to encourage growth within existing urban locations; however, the Welsh Government supports sustainable and vibrant rural communities and supports sustainable, appropriate and proportionate economic growth in rural areas. Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when implementing this policy to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
P31 – South West Metro	<p>The Welsh Government supports the development of the South West Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities.</p> <p><u>Impacts</u></p> <p>Whilst the development of the metro could bring environmental benefits through reduced car usage and subsequent reduction in air and noise pollution, and the majority of the works would be located within Swansea itself, as the precise details of the proposed metro are currently unknown, there is the potential for impacts on Natura 2000/ Ramsar site located around Swansea. The Burry Inlet SPA/Ramsar site and Carmarthen Bay and Estuaries SAC lie to the west of Swansea.</p>	No adverse effect on integrity of Natura 2000/ Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>Crymlyn Bog SAC/Ramsar site are on the eastern edge of Swansea, with the Gower Commons SAC and Gower Ash Woods SAC to the south west.</p> <p>Potential impacts could include (but are not limited to): disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of the metro if outside of urban locations, or along the coast), or through other effects such as water/ air pollution or increased disturbance/damage as a result of recreational pressures from an increased population within the region (should the metro provide greater access to coastal areas known to support sensitive habitats and species).</p> <p><u>Avoidance/Mitigation</u></p> <p>Given the scale of the potential new Metro Scheme, project-level HRA is likely to be required to comply with PPW10. Development of the metro Scheme would also be subject to the requirements of HRA at the appropriate planning stage. Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000/ Ramsar sites, Local Planning Authorities, Strategic Planning Panels and developers must also ensure that they adhere to the following measures when implementing this policy:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Transport policies developed through lower-tier plans (including allocating land for the new metro) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with</p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
<p>P32 Haven Waterway and Energy</p>	<p>This Policy sets out Welsh Government's position in relation to the operations at Haven Waterway and recognises its location for potential new renewable and low carbon energy-related development, innovation and investment. The policy states that <i>'new energy-related development should support local and regional communities and provide jobs and investment in training and skills.'</i></p> <p><u>Impacts</u></p> <p>Although the Haven Waterway is an existing port with long-established industries, and a key location for the UK's energy supplies, it also forms part of the West Wales Marine SAC and Pembrokeshire Marine SAC. Any potential new renewable and low carbon energy-related development, innovation and investment at the port has the potential to impact on the adjacent SACs, as well as Natura 2000/ Ramsar sites further afield including sites designated sites for marine mammals such as Bristol Channel Approaches SAC; Lleyn Peninsula and the Sarnau SAC; and Cardigan Bay SAC.</p> <p>The Haven Waterway was included as an allocation within the Pembrokeshire Local Development Plan (Pembrokeshire Council, 2013). Policy SP2 (Port and Energy related development) of the LDP includes Development at the Ports of Milford Haven. The policy states that development will be permitted for port related facilities and infrastructure, including energy related development. A HRA of the LDP was carried out in 2012 (Pembrokeshire Council, 2012). Potential impacts identified included: disturbance/displacement effects (noise/ visual/vibration) upon breeding and/or foraging qualifying features of the marine sites; loss/ damage to sensitive marine and coastal habitats (in particular the adjacent SACs); potential impacts to foraging and/ or breeding habitats associated with changes to coastal processes; potential increases in air pollution through construction activities and/or increased boat traffic; potential impacts on water quality (such as pollution within the marine environment from construction activities, dredging, or increased boat traffic); indirect effects such as increased recreational pressures on the coastline through additional tourism to the area; and potential in-combination effects with other large-scale coastal projects regionally/ nationally. The HRA of the LDP concluded that implementation of Policy SP2 would not have no impacts on Natura 2000/ Ramsar sites, assuming project-level HRA was undertaken to identify and mitigate any potential adverse impacts. Policy SP2 states that <i>'Individual proposals coming forward under policy SP2 will require project level Habitats Regulation Assessment to consider their likely significant effects on features of the SAC. This is achieved through Policy GN36 within the LDP which states that 'Development Proposals with potential for adverse effect on internationally or nationally important sites will require detailed assessment before progressing. Specifically, if any development proposal is likely to have a significant effect on a European protected site or species it shall be subject to an Appropriate Assessment of the implications in relation to the site's conservation objectives.'</i></p> <p><u>Avoidance/ Mitigation</u></p> <p>Whilst the HRA of the LDP concludes no adverse effect on Natura 2000/ Ramsar sites (with mitigation in place), other projects at the port could come forward as a result of Policy 32 during the NDF plan period, outside of boundary of Policy SP2 within the LDP; therefore, the conclusion of the LDP HRA cannot be solely relied upon to conclude no adverse effects of</p>	<p>No adverse effect on integrity of Natura 2000/ Ramsar sites</p>

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>Policy 32 of the NDF. However, given the likely size of future development at the port, project-level HRA is likely to be required (to comply with PPW10) which would identify any other impacts not considered in the LDP HRA. Given the probable size and scale of future energy development at the Port and its associated infrastructure, project-level HRA is likely to be required to comply with PPW10. Infrastructure development associated with Haven Waterway would also be subject to the requirements of HRA at the appropriate planning stage. The policy also states that: <i>'In determining any applications for energy proposals in this area, consideration should be given to the contribution it will make to decarbonising our energy supplies, the impacts on the landscape, seascapes, natural and historic environment and the economic benefits they would bring to the region. On-shore developments associated with off-shore renewable energy projects will be supported in principle.'</i> Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000/ Ramsar sites, the following measures must be adhered to (when future energy related projects come forward) to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites.</p> <p><i>Avoidance/mitigation measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Projects related to development at Haven Waterway must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW 10, TAN 5 and Policy GN36 of the Pembrokeshire LDP). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures necessary during project level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Haven Waterway where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of the Port of Milford Haven will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW 10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
P33 – National Growth Area – Cardiff, Newport and the Valleys	<p>The policy identifies Cardiff, Newport and the Valleys as the main focus for growth and investment in the South East region.</p> <p><u>Impacts</u></p>	No adverse effect on integrity of Natura 2000/ Ramsar sites

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>This policy supports the development of Strategic and Local Development Plans as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>The Severn Estuary SAC/SPA/Ramsar site and Cardiff Beech Woods SAC are located in the vicinity of Cardiff with the River Usk SAC and Severn Estuary SAC/SPA/Ramsar site close to Newport. There are a small number of Natura 2000/ Ramsar sites within the Heads of the Valleys area, including Blaen Cynon SAC (designated for marsh fritillary butterfly), Coedydd Nedd a Mellte SAC and Cwm Cadlan SAC. All of these designated sites could be affected by development within these three National Growth Areas.</p> <p>Focusing growth in and around the existing urban areas is considered likely to minimise the potential for adverse effects on designated sites; however, in the absence of a spatial element to the policy, the potential for Natura 2000/ Ramsar sites to be affected cannot be ruled out. Increased growth in Cardiff, Newport and the Valleys could lead to impacts upon Natura 2000/ Ramsar sites through potential disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of land allocations within lower-tier plans), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region. Increased growth in the Valleys could also lead to impacts upon Blaen Cynon SAC (designated for marsh fritillary butterfly) through disturbance, loss or fragmentation of habitats suitable for marsh fritillaries.</p> <p><u>Avoidance/ Mitigation</u></p> <p>The main focus of the policy is to encourage growth within existing urban locations; however, the Welsh Government supports sustainable and vibrant rural communities and supports sustainable, appropriate and proportionate economic growth in rural areas. Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures when implementing this policy to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. <p><u>Conclusion</u></p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
<p>P35 – Valleys Regional Park</p>	<p>The Welsh Government supports the establishment of the Valleys Regional Park, although the exact location is not currently determined.</p> <p><u>Impacts</u></p> <p>The creation of a Valleys Regional Park is considered to be a positive policy, with many environmental, economic and social benefits; however, if any elements of the Park are located in an unsuitable location, the policy could potentially lead to detrimental impacts on existing habitats and species. There are a number of Natura 2000/ Ramsar sites within the Valleys area, including Blaen Cynon SAC, Coedydd Nedd a Mellte SAC and Cwm Cadlan SAC which could be impacted by any potential new Park development. Whilst developing the new Park within a Natura 2000/ Ramsar site would clearly be contrary to their conservation objectives, it is also possible that locating the new Park adjacent to such sites could also have adverse effects, especially if species from those sites depend upon similarly-open habitats beyond the site boundaries (e.g. for foraging or roosting). Introducing new habitats adjacent to existing sensitive habitats could also have negative impacts on the hydrology of the area, may introduce a different seed bank of unwanted species, and/or could provide cover for predators of qualifying species. Given that one of the main purposes of the Regional Park is to encourage visitors to the area, recreational pressure, especially in areas not currently disturbed by human activity. New traffic to an area may also have impacts on local air quality.</p> <p><u>Avoidance/Mitigation</u></p> <p>It is clearly important to ensure that sites selected to support the delivery of this policy are not already designated for the presence of other sensitive habitats which would be compromised by such development. Where sensitive habitats and species could be present, Local Planning Authorities, Strategic Planning Panels and developers must adhere to the following measures to ensure no adverse impact on integrity of Natura 2000/ Ramsar sites as a result of policy implementation:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p> <p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Policies and/or projects developed through lower-tier plans (including allocating land for the new Park) must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. 	<p>No adverse effect on integrity of Natura 2000/ Ramsar sites</p>

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<ul style="list-style-type: none"> As one of the main aims of the new Park is to provide a resource for recreation. Future development of the park must consider the implications of increased recreational pressure on Natura 2000/ Ramsar sites (in particular through in-combination effects with other new development) to ensure no adverse effects on the integrity of such sites. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	
P36 – South East Metro	<p>The Welsh Government supports the development of the South East Metro and will work with Transport for Wales, Local Authorities and other partners to enable its delivery and maximise associated opportunities. The metro would be developed across the South East region. Cardiff, Newport, Merthyr Tydfil, Pontypridd, Caerphilly and Bridgend will be strategically important locations on the South East Metro system.</p> <p><u>Impacts</u></p> <p>Whilst the development of the metro could bring environmental benefits through reduced car usage and subsequent reduction in air and noise pollution, as the precise details of proposed metro are currently unknown, there is the potential for impacts on Natura 2000/ Ramsar site located around Cardiff and the Valleys. The Severn Estuary SAC/SPA/Ramsar site and Cardiff Beech Woods SAC, as well as Blaen Cynon SAC (designated for marsh fritillary butterfly), Coedydd Nedd a Mellte SAC and Cwm Cadlan SAC are all located in the vicinity of areas where the proposed metro could be located and therefore could be impacted by such future development.</p> <p>Potential impacts could include (but are not limited to): disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of the metro if outside of urban locations, or along the coast), or through other effects such as water/ air pollution or increased disturbance/damage as a result of recreational pressures from an increased population within the region (should the metro provide greater access to coastal areas known to support sensitive habitats and species).</p> <p><u>Avoidance/Mitigation</u></p> <p>Given the scale of the potential new Metro Scheme, project-level HRA is likely to be required to comply with PPW10 Development of the metro Scheme would also be subject to requirements of HRA at the appropriate planning stage. Although this provides assurance that applications will be required to show that they have assessed the potential impacts on Natura 2000/ Ramsar sites, Local Planning Authorities, Strategic Planning Panels and developers must also ensure that they adhere to the following measures when implementing this policy:</p> <p><i>Measures applicable to more than one policy (refer to Table 6): A to H</i></p>	

Policy	Potential effects on integrity of Natura 2000 / Ramsar sites and proposed avoidance / mitigation requirements	Conclusion (assuming mitigation is implemented)
	<p><i>Policy-specific measures:</i></p> <ul style="list-style-type: none"> • Transport policies developed through lower-tier plans (including allocating land for the new metro) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p><u>Conclusion</u></p> <p>Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.</p>	

4.4 Appropriate Assessment Conclusion (alone)

The Appropriate Assessment reviewed 24 screened-in policies for the potential for adverse effects on the integrity of Natura 2000/ Ramsar sites as a result of policy implementation.

Overall, none of the policies in the NDF are considered to actively direct development to a location or in a manner that potential impacts arising from projects emerging under the policies (or lower-tier plans which will identify development opportunities for allocation) could not be avoided or mitigated at the lower-tier plan or project level.

It is not possible at this high level to identify all impacts associated with policy implementation; however, the Appropriate Assessment process has determined the types of impacts which are most likely to be encountered and identified measures for each of the policies which would avoid/ mitigate for such types of impacts. These measures must be adhered to by Local Planning Authorities, Strategic Planning Panels and developers when implementing the policies to ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites. A summary of the avoidance/ mitigation measures is provided in Appendix A and reference to this Appendix has been clearly set out within the HRA section in Chapter one of the NDF.

All lower-tier plans and projects with the potential to impact Natura 2000/ Ramsar sites (regardless of their distance from such sites) are required to comply with the Conservation of Habitats and Species Regulations (2017), PPW10 and TAN5 as a matter of law. Therefore, irrespective of the policy wording or mitigation measures included within the NDF or this HRA document, statutory HRA of lower tier plans/ projects would be required. Compliance with PPW10, TAN5 and the avoidance/ mitigation measures set out against each of the policies will provide an overarching safeguard to which other policies within the NDF, as well as those in lower-tier plans and projects, will be required to adhere to. The Welsh Government would not support any lower-tier plans or projects, associated with policies within the NDF, where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.

The Appropriate Assessment (alone) therefore concludes that (assuming the avoidance/ mitigation measures set out within this HRA are implemented), there would be no adverse impacts on the integrity of any Natura 2000/ Ramsar sites as a result of implementation of the policies set out with the NDF.

5 In-Combination Effects

Given the high-level of the NDF, there is the potential for in-combination effects with other plans and projects through policy implementation. However, for the purpose of this assessment, and in keeping with the high-level nature of the NDF, only key relevant high-level plans that could potentially result in in-combination effects have been considered (as agreed in consultation with NRW).

Lower-tier plans

The lower-tier planning documents, including Strategic Development Plans or their constituent Local Development Plans, will identify the locations to be allocated for development and it is therefore only at this level that the potential for impacts on Natura 2000/ Ramsar sites can be properly assessed. Furthermore, it is not possible to consider in-combination effects between these documents and the NDF since they are not independent of each other (not least because such plans will be required to be in general conformity with the policies within the NDF). However, Local Planning Authorities and Strategic Planning Panels must adhere to the avoidance/ mitigation measures set out within this HRA when developing lower-tier plans to ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites. The NDF would not support any lower-tier plans, where adverse effects (either alone or in-combination) on Natura 2000/ Ramsar sites cannot be avoided through mitigation.

Other strategies and plans

The NDF sits alongside a number of other Government strategies/plans. The plans considered in the assessment include: the Wales Infrastructure Investment Plan, the Welsh National Marine Plan, the Wales Transport Strategy, Natural Resources Policy; the Brexit and Our Land document; as well as draft National Strategy for Flood and Coastal Erosion Risk Management; Shoreline Management Plans (SMPs); River Basin Management Plans (RBMPs); Catchment Flood Management Plans (CFMPs); Flood Risk Management Plans (FRMPs); Regional Waste Plans; Regional Transport Plans; and Water Resources Management Plans.

Wales Infrastructure Investment Plan

The Wales Infrastructure Investment Plan (WIIP) sets out the potential investment opportunities within the public and private sector in Wales. The project pipeline document (Welsh Government, 2019b) lists the private and public infrastructure developments planned under the WIIP. Because there are no specific details pertaining to the nature of the potential developments within the NDF, at this high-level it is not possible to completely rule out potential for in-combination effects with the WIIP and the NDF policies (in particular, related to economic growth, transport, regeneration, industry, energy and housing). However, projects outlined in project pipeline document will be one of the mechanisms through which NDF policies are implemented over the plan period. As such, projects which come through the WIIP must comply with the avoidance/ mitigation measures set out within the NDF (and this HRA) to ensure no adverse impact on Natura 2000/ Ramsar sites. This would include ensuring no adverse in-combination effects on these designated sites.

Welsh National Marine Plan

The Welsh National Marine Plan (WNMP) (Welsh Government, November 2019a) sets out how sustainable development can be achieved in the marine area to benefit from the economic and ecological value of the inshore and offshore seas around Wales. The WNMP has been subject to HRA (Welsh Government, November 2019b), including Screening and Appropriate Assessment. The HRA concluded that *'the measures within the WNMP together with the availability and means of ensuring project-level mitigation will ensure that there will be no adverse effect on the integrity of any European sites alone or in combination, as a result of the plan's implementation.'* The WNMP has informed the preparation of the NDF and, where relevant, it will inform Strategic and Local Development Plans and planning decisions. The timescales for the production of the WNMP and the NDF have overlapped, enabling the production of both plans to be joined up. This link will continue as both plans are implemented and reviewed. The NDF and the WNMP work together to provide a framework for the management of change around the coast and as such there would be no in-combination effects between the documents.

Wales Transport Strategy

The current Wales Transport Strategy (Welsh Government, 2008) was designed to *'promote sustainable transport networks that safeguard the environment while strengthening our country's economic and social life'* across Wales. Since 2008, the Active Travel (Wales) Act 2013 has been introduced, which will increasingly influence the way active travel with new development are integrated. A new Wales Transport Strategy is

currently being developed, which will recognise these changes and look to address future opportunities and challenges. The existing and emerging Wales Transport Strategy, along with the associated transport policies and projects, have directly contributed to the spatial strategy, outcomes and policies of the NDF, and as such there would be no in-combination effects between the documents.

Regional Transport Plans

Regional Transport Plans will also be one of the mechanisms through which the new Wales Transport Strategy, Wales Transport Delivery Plan and the NDF policies will be implemented. As such, projects which come through the Regional Transport Plans will have to comply with the avoidance/ mitigation measures set out within the NDF (and this HRA) to ensure no adverse impact on Natura 2000/ Ramsar sites. This would include ensuring no adverse in-combination effects on these designated sites.

National Resources Policy

The National Resources Policy (NRP) focuses on ‘*sustainable management of Wales’ natural resources, to maximise their contribution to achieving goals within the Well-being of Future Generations Act.*’ Its objectives are to maintain and enhance the resilience of ecosystems and the benefits they provide. PPW outlines how the planning system should contribute towards these goals and the NDF builds on this policy by setting out specific policies (including Policy 9: Resilient Ecological Networks and Green Infrastructure) that:

- safeguard areas for the purposes of improving the resilience of ecological networks and ecosystems services, to identify areas for the provision of green infrastructure and to secure biodiversity enhancement (net benefit);
- to ensure resilient location and design choices by promoting a sustainable growth strategy as well as ensuring the consideration of natural resources and health and well-being form part of site and design choices; and,
- to facilitate the decarbonisation of the economy, including energy and transport choices, and promote the principles of a circular economy

The NDF policies have been designed to help achieve the goals of the NRP, and therefore would not lead to negative in-combination effects with the NDF.

Brexit and Our Land

The Brexit and Our Land document sets out the proposed new Land Management Programme that will replace the Common Agricultural Policy (CAP), in its entirety, following Brexit. Depending on the final content of the Landscape Management Plan, there is the potential for in-combination effects with NDF policies which support rural development, such as policy 4 – Supporting Rural Communities. Any Wales related land management strategies that are developed post-Brexit will also need to be considered in future in-combination assessments. However, given that such documents have not yet been produced, it is not possible to meaningfully assess in-combination effects at this stage.

Draft National Strategy for Flood and Coastal Erosion Risk Management, Shoreline Management Plans (SMPs), Flood Risk Management Plans (FRMPs), Catchment Flood Management Plans (CFMPs)

SMPs, FRMPs, CFMPs are all mechanisms which support and help to achieve the draft National Strategy for Flood and Coastal Erosion Risk Management in Wales (Welsh Government, 2019).

NDF policies support growth and regeneration in areas at risk of coastal squeeze and flooding which can place greater need for flood defences in those coastal regions (which in-turn can lead to increased coastal squeeze). However, these are already populated areas and subject to some level of existing flood defence management, therefore, if coastal squeeze is focussed in the existing areas, this may reduce the pressure on other sections of coastline around Wales. As lower-tier plans and projects are developed in flood risk areas, the needs of the community will be identified, and flood risk management developed through Flood Risk Management Plans. These would be subject to their own plan-level HRA (to comply with PPW 10 and TAN 5) and the need for mitigation identified. The NDF does not support any proposals associated with flood risk management where adverse in combination effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. Due to their location, some coastal schemes are likely to go through to the IROPI stage of assessment. A large proportion of these would come through the National Flood Strategy and measures would be delivered through the NHCP to ensure the provision of compensation. If there is the potential for flood alleviation projects (not related to the National Strategy) to adversely impact on Natura 2000/ Ramsar sites (such as coastal schemes), these should be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4)

of the Habitats Directive, namely no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and compensatory measures secured.

River Basin Management Plans (RBMPs)

RBMPs cover entire river systems, including river, lake, groundwater, estuarine and coastal water bodies. The aim of the RBMPs is to improve and maintain water quality and protect associated ecosystems and therefore would not result in in combination effects with the NDF.

Regional Waste Plans

Regional Waste Plans set out the how waste will be managed in different areas across Wales. However, these are now being replaced by the Collections Infrastructure and Markets Sector Plan. Although there is the potential for in-combination effects with waste plans and the NDF policies related to growth, industry and housing (in particular the regional policies set out within Chapter 5 of the NDF), given that waste planning would be developed collaboratively with local planning authorities (as per TAN21), policies or initiatives which come through the Collections Infrastructure and Markets Sector Plan will have to comply with the avoidance/mitigation measures set out within the NDF (and this HRA) to ensure no adverse impact on Natura 2000/ Ramsar sites. This would include ensuring no adverse in-combination effects on these designated sites.

Water Resources Management Plans

Water Resources Management Plans ensure that there is sufficient water supply to meet demand. There are five water companies in Wales: Dŵr Cymru Welsh Water, Hafren Dyfrdwy/ Severn Trent Water, Albion Water and Southern and Scottish Energy Water. Water companies have a statutory duty to prepare, consult, publish and maintain a 25-year water resources management plan. Plans are produced on a five-yearly basis and the most recent plans were published in 2019. Plan-level HRA has been carried out for all of the Water Resources Management Plans, where potential impacts on Natura 2000/ Ramsar sites was identified. At this high-level it is not possible to completely rule out potential for in-combination effects with Water Resources Management Plans and the NDF policies. However, new development which comes forward through lower-tier plans/projects would need to ensure that potential in-combination impacts on water resources have been identified and avoided or mitigated, as required, to ensure no adverse impact on Natura 2000/ Ramsar sites.

Wales/ England border

In addition to the Welsh development plans, set out above, there is also the potential for in-combination impacts on Natura 2000/ Ramsar sites between the NDF and English plans.

There are a number of Natura 2000/ Ramsar sites which lie at the border between Wales and England, for example, the Dee Estuary SPA/SAC/ Ramsar site, the Severn Estuary SPA/SAC/ Ramsar site, Midland Meres and Mosses Ramsar sites, Liverpool Bay SPA, and the River Wye SACs, as well as other areas in the vicinity of the border in both England and Wales. Potential in-combination impacts on these Natura 2000/ Ramsar sites could arise through policies implemented in both countries.

The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. The policy framework relating to areas such as housing supply, economy, sustainable transport, land-use, and minerals have the potential for in-combination effects with NDF policies related to growth, industry and housing which cannot be ruled out at this stage due to the high-level nature of the NDF. However, all lower-tier plans and projects with the potential to impact Natura 2000/ Ramsar sites are required to comply with the Conservation of Habitats and Species Regulations (2017), PPW10 and TAN5 as a matter of law. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. This would include ensuring no adverse in-combination effects on Natura 2000/ Ramsar sites.

Projects

Although there is a spatial element to a number of the policies (such as Policy 17: Renewable and Low Carbon Energy and Associated Infrastructure), the NDF does not include reference to specific DNSs or any other project-level development. Such developments would likely originate through lower-tier plans, including Strategic or Local Development Plans. As all lower-tier plans and projects with the potential to impact Natura 2000/ Ramsar sites (either alone or in-combination) are required to comply with the Conservation of Habitats and Species Regulations (2017), PPW10 and TAN5 as a matter of law, potential in-combination effects would

be identified and mitigated, where appropriate, at this subsequent stages of the implementation of the NDF. The Welsh Government would not support any projects, associated with policies within the NDF, where adverse in-combination effects on Natura 2000/ Ramsar sites cannot be adequately mitigated.

5.1 Appropriate Assessment In-combination Conclusion

It is not possible at this high level to identify an extensive list of all plans and projects which may lead to in-combination effects together with the NDF; at the lower tier plan level, the Appropriate Assessments will have a better understanding of the likely impacts, alone and in combination with other relevant regional or local plans, on particular Natura 2000/ Ramsar sites and their conservation objectives. The in-combination assessment at this high level is necessarily limited, and therefore in-combination effects cannot be completely ruled out. However, given that as all plans and projects with the potential to impact Natura 2000/ Ramsar sites are required to comply with the Conservation of Habitats and Species Regulations (2017), PPW10 and TAN5 as a matter of law, any potential in-combination effects would be identified and appropriate mitigation developed at subsequent lower-tier stages of the implementation of the NDF. Compliance with PPW10, TAN5 and the mitigation measures set out against each of the policies within the NDF will ensure no adverse in-combination effects on Natura 2000/ Ramsar sites. The Welsh Government would not support any lower-tier plans or projects, associated with policies within the NDF, where adverse in-combination effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.

The in-combination assessment therefore concludes that (assuming the avoidance/ mitigation measures set out within this HRA are implemented), there would be no adverse in-combination impacts on the integrity of any Natura 2000/ Ramsar sites as a result of implementation of the policies set out with the NDF.

6 Overall Conclusion

Whilst this HRA has made it clear that it is difficult at this very high-level stage of the development planning process to be clear about how Natura 2000/ Ramsar sites may or may not be affected by strategic policy decisions, it is important to note that the potential implications for Natura 2000/ Ramsar sites have been considered throughout the development of the NDF, such that early avoidance of the issues (and/or reduction of risk) has been a key element of the process when compiling the policies within the NDF. Table 7 of the Appropriate Assessment sets out the type of impacts which could occur through implementation of the policies and identifies avoidance/mitigation measures which must be adhered to when producing lower-tier plans and projects to ensure no adverse impacts on Natura 2000/ Ramsar sites. This, in addition to the legal requirement for lower-tier plans and projects with the potential to impact Natura 2000/ Ramsar site (through the Habitats Regulations (2017), PPW10 and TAN5) to undertake HRA, provides sufficient safeguarding to be able to confirm that no adverse effects on integrity are anticipated as a result of implementing the NDF policies (alone or in-combination).

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APPENDIX A

Appropriate Assessment Avoidance/Mitigation Measures Summary Table

Wales National Development Framework

Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
Policy 3 –Supporting Urban Growth and Regeneration - Public Sector Leadership	A to H	<ul style="list-style-type: none"> • Policies developed through lower-tier plans (including land allocations) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.
Policy 8 - Flooding	A to H	<ul style="list-style-type: none"> • Any other projects which come forward as a result of implementation of Policy 8, not related to the National Flood Strategy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • If there is the potential for flood alleviation projects (not related to the National Strategy) to adversely impact on Natura 2000/ Ramsar sites (such as coastal schemes), these should be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive, namely no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and compensatory measures secured.
Policy 9 – Resilient Ecological Networks and Green Infrastructure	A to G	<ul style="list-style-type: none"> • Green infrastructure policies and/or projects developed through lower-tier plans (including allocating land for green infrastructure) must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. Green Infrastructure Assessments must fully consider the implication of any proposed enhancement/ habitat creation on Natura 2000/ Ramsar site to ensure no adverse effects on the integrity of Natura 2000/ Ramsar sites. In particular, the implications of human disturbance (including dog-walking) on sensitive habitats and qualifying species if new green infrastructure is aimed at providing a resource for recreation.
Policy 10 – International Connectivity	A to I	<p><i>Cardiff Airport</i></p> <ul style="list-style-type: none"> • Projects related to the expansion of Cardiff Airport must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed

Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
		<p>necessary during project level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Cardiff Airport where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.</p> <ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of Cardiff Airport will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. The wording within Policy 10 also acknowledges that <i>'the NDF and the Wales Transport Strategy should be used together and an integrated approach taken to their implementation at the regional and local levels. This is critical to ensure new development is built in sustainable locations and supported by the active travel and public transport infrastructure... ensuring average levels of airborne pollution continue to be reduced.'</i> Future development at the airport will need to ensure that it complies with any future air quality targets associated with the National Transport Delivery Plan in order to ensure no adverse effects on the integrity of Natura 2000/ Ramsar sites. <p><i>Holyhead</i></p> <ul style="list-style-type: none"> Projects related to the expansion of Holyhead Port (including the HRO referred to above) must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed necessary during project level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Holyhead Port where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of the Port will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p><i>Haven Waterway</i></p> <ul style="list-style-type: none"> Projects related to development at Haven Waterway must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5 and Policy GN36 of the Pembrokeshire LDP). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed necessary during project level HRA can be delivered. If the project-level HRA

Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
		<p>cannot rule out adverse effects on site integrity, the project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Haven Waterway where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.</p> <ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of the Port will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. <p><i>Fishguard Port</i></p> <ul style="list-style-type: none"> Projects related to development at Fishguard Port must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5 and Policy GN36 of the Pembrokeshire LDP). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed necessary during project level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Haven Waterway where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of the Port will need to ensure that it complies with measures set out within these documents and be subject to HRA where required.
P11 - National Connectivity	A to H	<ul style="list-style-type: none"> Transport policies developed through lower-tier plans (including allocating land for new transport links) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.

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Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
		<ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects associated with this policy will need to ensure that it complies with measures set out within these documents and be subject to HRA where required. When using the Active Travel Maps to determine the location of new cycle routes, or highlight areas of improvement, any assessments must fully consider the implication of such proposals on Natura 2000/ Ramsar site to ensure no adverse effects on the integrity of Natura 2000/ Ramsar sites. (In particular, the implications of human disturbance on sensitive habitats and qualifying species and routing new cycle paths through Natura 2000/ Ramsar sites/land functionally linked to Natura 2000/ Ramsar sites.
Policy 12 – Regional Connectivity	A to H	<ul style="list-style-type: none"> Transport policies developed through lower-tier plans (including allocating land for new transport links) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects associated with this policy will need to ensure that it complies with measures set out within these documents and be subject to HRA where required.
Policy 13 – Supporting Digital Communications	A, B, C, D, F, G	<ul style="list-style-type: none"> Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.
Policy 14 – Planning in Mobile Action Zones	A, B, C, D, F, G	<ul style="list-style-type: none"> Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the

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Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
		<p>Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.</p>
Policy 15 – National Forest	A, B, C, D, E, F, G	<ul style="list-style-type: none"> • Policies and/or projects developed through lower-tier plans (including allocating land for new woodland) must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy.
Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure	A, B, C, D, F, G	<ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The assessment undertaken in Appendix B for the Pre-Assessed Wind Area should be used, along with the buffers identified in Section 1.5, to guide the locations of future renewable energy projects in Wales. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development of renewable energy projects can be delivered at the plan/ project level. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • Large-scale renewable projects, which qualify as DNSs, must ensure that they comply with criteria 3 of Policy 18 before they can be permitted.
Policy 20 – National Growth Area - Wrexham and Deeside	A to H	<ul style="list-style-type: none"> • Policies developed through the Strategic Development Plan/ other lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • Local Planning Authorities, Strategic Planning Panels and developers must utilise documents such as the Supplementary Planning Guidance 8a Great Crested Newt Mitigation Requirements (Flintshire County Council, 2018), or equivalent, to help inform future plan and/or project proposals to avoid adverse effects on the integrity of Natura 2000/ Ramsar sites

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Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
Policy 21 – Regional Growth Area - North Wales Coastal Settlements	A to H	<ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.
Policy 23 – North Wales Metro	A to H	<ul style="list-style-type: none"> • Transport policies developed through lower-tier plans (including allocating land for the new metro) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects will need to ensure that it complies with measures set out within these documents and be subject to HRA where required.
Policy 24 – North West Wales and Energy	A to H	<ul style="list-style-type: none"> • Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • Use the Pre-Assessed Wind Areas mapping (refer to policy 17 and Appendix B) to identify potential future locations for Wind Energy development.

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Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
		<ul style="list-style-type: none"> The HRA of the Wylfa Newydd nuclear power station site (Horizon Nuclear, 2018) identified the potential for adverse effects on Natura 2000/ Ramsar sites and mitigation measures have been proposed. These measures must be implemented in any future development at the site to ensure no adverse effect on the integrity of the Natura 2000/ Ramsar sites
Policy 25 – Regional Growth Areas – Mid-Wales	A to H	<ul style="list-style-type: none"> Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.
Policy 26 – Growing the Mid Wales Economy	A to H	<ul style="list-style-type: none"> Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. Use the Pre-Assessed Wind Areas mapping (refer to policy 17 and Appendix B) to identify potential future locations for Wind Energy development. As one of the aims of the policy is to support rural tourism. Future development in the tourism sector must consider the implications of increased recreational pressure on Natura 2000/ Ramsar sites (in particular through in-combination effects with other new development) to ensure no adverse effects on the integrity of such sites.
Policy 27 – Movement in Mid-Wales	A to H	<ul style="list-style-type: none"> Transport policies developed through lower-tier plans (including allocating land for new transport links) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-

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Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
		<p>assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.</p> <ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects associated with this policy will need to ensure that it complies with measures set out within these documents and be subject to HRA where required.
Policy 28 –National Growth Area - Swansea Bay and Llanelli	A to H	<ul style="list-style-type: none"> Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. Ensure mitigation measures set out in the HRA of Swansea Council LDP are adhered to when projects which come forward as a result of implementation of this policy, in particular mitigation measures to avoid water quality impacts on the CBEEMS.
Policy 29 – Regional Growth Areas – Carmarthen and the Haven Towns	A to H	<ul style="list-style-type: none"> Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.
Policy 31 – South West Metro	A to H	<ul style="list-style-type: none"> Transport policies developed through lower-tier plans (including allocating land for the new metro) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-

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Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
		<p>assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.</p> <ul style="list-style-type: none"> The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects will need to ensure that it complies with measures set out within these documents and be subject to HRA where required.
Policy 32 – Haven Waterway and Energy	A to H	<ul style="list-style-type: none"> Projects related to development at Haven Waterway must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5 and Policy GN36 of the Pembrokeshire LDP). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Future developers must be able to demonstrate that any mitigation measures deemed necessary during project level HRA can be delivered. If the project-level HRA cannot rule out adverse effects on site integrity, the project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with Haven Waterway where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure associated with the expansion of the Port will need to ensure that it complies with measures set out within these documents and be subject to HRA where required.
Policy 33 – National Growth Area - Cardiff, Newport and the Valleys	A to H	<ul style="list-style-type: none"> Policies developed through lower-tier plans or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify those Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation.
Policy 35 – Valleys Regional Park	A to H	<ul style="list-style-type: none"> Policies and/or projects developed through lower-tier plans (including allocating land for the new Park) must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. As one of the main aims of the new Park is to provide a resource for recreation, future development of the park must consider the implications of increased recreational pressure on Natura 2000/ Ramsar sites (in particular

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Policy	Avoidance/mitigation measures applicable to more than one policy (refer to Table 6)	Policy Specific Measures
Policy 36 – South East Metro	A to H	<p>through in-combination effects with other new development) to ensure no adverse effects on the integrity of such sites.</p> <ul style="list-style-type: none"> • Transport policies developed through lower-tier plans (including allocating land for the new metro) or projects which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000/ Ramsar sites (to comply with PPW10 and TAN5). The buffers set out in Section 1.5 should be used to help identify the Natura 2000/ Ramsar sites which could be impacted by future development under this policy. Local Planning Authorities, Strategic Planning Panels and developers must be able to demonstrate that any mitigation measures deemed necessary during lower-tier plan or project level development can be delivered at the plan/ project level. If the HRA of a lower-tier plan or project cannot rule out adverse effects on site integrity, the lower-tier plan or project will either have to be withdrawn, or amended and re-assessed, or pass the derogations set out under Article 6(4) of the Habitats Directive (i.e. no alternative solutions, IROPI) and compensatory measures secured. The NDF does not support any proposals associated with this policy where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation. • The Welsh Government will publish a new Wales Transport Strategy and associated National Transport Delivery Plan in 2020. Any new infrastructure projects will need to ensure that it complies with measures set out within these documents and be subject to HRA where required.

APPENDIX B

Pre-Assessed Wind Areas Assessment

As part of the development of the renewables energy policies for the NDF, the Welsh Government identified a number of Areas suitable for potential future energy development. Getting to the current 'Pre-Assessed Areas' (shown on Figure 1 below) has been an iterative process with three main phases.

Phase 1

The initial prioritisation and selection process for these areas identified key opportunities (e.g. good wind availability) as well as likely constraints to such development (e.g. National Parks, Areas of Outstanding Natural Beauty (AONB), Natura 2000/ Ramsar sites, heritage features, overhead power lines, centres of population, etc.), and used this to determine the boundaries for these initial 'Priority Areas'. The areas of 'greatest opportunity', 'varying opportunity' and 'least opportunity' were initially identified, which was then used to inform the identification of the Priority Areas for solar and wind energy development. Whilst this initial selection did take into account the presence of Natura 2000/ Ramsar sites, more detailed consideration of the implications for these key sites of solar and/or wind energy development in the proposed Priority Areas (especially the parts classified as being of 'greatest opportunity') was clearly required. An initial assessment was therefore carried out with a view to informing further refinement of the boundaries of the Priority Areas. The initial assessment was submitted to Welsh Government in March 2019, and was used to refine the proposals and, more specifically, to amend the boundaries of the Priority Areas.

Phase 2

Following the initial assessment, a revised Priority Areas for Solar and Wind Energy map was compiled. Composite figures were produced for the initial assessment illustrating the juxtaposition of the initial Priority Areas relative to the Natura 2000 network across Wales; these were updated in July 2019 to reflect the amended boundaries of the revised Priority Areas for Solar and Wind Energy map (refer to Arcadis, July 2019). In most cases, the boundaries were further refined since the initial assessment in order to avoid impacts on Natura 2000/ Ramsar sites. It also showed that there was a clear distinction between areas allocated for solar only and those allocated for both wind and solar, which further aided the assessment.

Phase 3

The NDF went to public consultation in August 2019. Based on the comments received (refer to <https://gov.wales/draft-national-development-framework>), the renewables policies and mapping were further refined. This has included the removal of areas identified for solar development and the contraction of a number of the remaining potential wind energy areas. The term 'Priority Area' has also been retitled 'Pre-Assessed Areas' to better reflect their position as areas where the Welsh Government would like to see barriers reduced to large scale wind energy developments. [Note that this is not to say that these developments will not go through the full scrutiny of the planning processes. All planning applications, regardless of their location, will be determined under the same policy framework.]

Table A below represents the process by which the Pre-Assessed Areas have been developed. Column 1 list the Pre-Assessed Areas (in bold) alongside their previous 'Priority Area' number for reference). Column 2 summarises the rationale for the initial identification of each Priority Area as a strategic target for renewable energy development (as provided by Arup), and also identifies other features of the landscape that contributed to subsequent refinement. Column 3 provides the detailed assessment of the initial set of Priority Areas, as carried out in the initial March 2019 assessment (Phase 1). Column 4 then provides a brief description of the modifications made to the new Priority Areas for Solar and Wind Energy boundaries after the initial HRA assessment (July 2019, Phase 2), Column 5 details the extent to which Natura 2000/ Ramsar sites within or close to the Pre-Assessed wind Energy Areas could be affected by windfarm development following the refinement of the maps as a result of public consultation (Phase 3).

Table B sets out the assessment of each of the Pre-Assessed Areas and includes reference to the Natura 2000/ Ramsar sites which could be affected by future proposed wind development, potential impacts and finally avoidance/ mitigation measures applicable to each Pre-Assessed Area.

Figure 1 illustrates the distribution of Natura 2000/ Ramsar sites across Wales, and clearly demonstrates how the more substantial sites (especially the larger Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)) have been avoided through the iterative refinement process. However, a large number of the Natura 2000/ Ramsar sites in Wales (SACs, in particular) are much smaller and more widespread than the large SPAs and were thus much harder to avoid during the refinement process. Figure 2 has thus been

produced to illustrate in closer detail the relationship between individual Natura 2000/ Ramsar sites and the Pre-Assessed Areas.

Table A: Implications of the Pre-Assessed Areas for Wind Energy development for Natura 2000/ Ramsar sites, see also Figures 2. Rows highlighted grey have been removed from the assessment through design refinement following public consultation

Areas	Rationale for selection & key elements for consideration in refinement	Recommendations for amending the original Priority Areas as set out in the initial (March 2019) assessment	Subsequent design refinement, and implications of the new Priority Areas for Solar and Wind Energy with regard to Natura 2000/ Ramsar sites (July 2019)	Design refinement following public consultation. (Assessment is presented in Table B below) (March 2020)
<p>002 North Wales (Anglesey and Gwynedd) (March 2019)</p> <p>Priority Areas 1 and 2 (July 2019)</p> <p>Area removed Pre-Assessed Areas (March 2020)</p>	<p>Good wind speeds across the island of Anglesey.</p> <p>Energy Island designation.</p> <p>Areas including all areas of greatest opportunity, where there is also grid and road access.</p> <p>North Wales connection project.</p> <p>Proximity to Caernarfon castle.</p> <p>Proximity to AONB and National Park.</p> <p>Radar / NATS constraints.</p>	<p>Within the Priority Area</p> <p>Parts of the Anglesey Fens SAC and Anglesey and Llyn Fens Ramsar site are located within the Anglesey part of this PA, but these are generally away from the areas shaded dark green ('greatest opportunity' for renewables development). Nevertheless, consideration will need to be given to whether or not wetland birds associated with the Ramsar site could be affected. Llyn Dinam SAC is also within the PA, and adjacent to an area shaded dark green, but this is unlikely to be significantly affected by renewables development unless it is located actually within the boundary of the SAC (which is very unlikely to be consented).</p> <p>The PA to the south of Anglesey (Gwynedd) includes the small cluster of sites covered by the Eifionydd Fens SAC designation; however, these sites are located outside of the dark green areas, and are therefore considered to be at low risk (especially given that neither birds nor bats are part of the designation).</p> <p>Outside the Priority Area</p> <p>There are a number of SPAs located around the Anglesey coastline, so the potential exists for any wind development within the dark green areas in the north of the PA to affect birds from these sites (although the deliberate positioning of the PA inland from the coast means that the risk is much lower). The dark green areas at the southern edge of the Anglesey part of this PA are therefore preferable in HRA terms. There are also a number of sand dune/saltmarsh SACs around the coastline, but the deliberate positioning of the PA inland from the coast means that these should be unaffected. The PA to the south of Anglesey (Gwynedd) generally avoids Natura 2000/ Ramsar sites, although the southern edge is adjacent to the North Cardigan Bay SPA, so any wind farms here would need careful consideration. Similarly, Glynllifon SAC is also adjacent to the PA, but is considered to be at low risk only (owing to its qualifying features). However, Meirionnydd Oakwoods and Bat Sites SAC, even though it is further away (to the east of the PA boundary), will need some consideration, as the lesser horseshoe bats associated with this site could potentially be affected by wind farm development at the eastern edge of this PA (albeit the risk is low, as horseshoe bats do not usually fly at the height of most turbines). Holy Island Coast SPA, which lies within/adjacent to the Priority Area, and whose features include breeding and wintering chough, could potentially be affected.</p>	<p>It is clear from a simple comparison between the original Priority Area map and the refined version that the boundaries of the new Priority Areas in this part of North Wales have been substantially reduced in order to avoid impacts on the Natura 2000/ Ramsar sites. Furthermore, the distinction (on the new Priority Areas map) between those areas allocated purely for solar development and those allocated for wind and solar has made it easier to assess the implications for Natura 2000/ Ramsar sites.</p> <p>New Priority Area 1</p> <p>The significant contraction in the boundaries of the new Priority Area away from the highly designated coastal parts of Anglesey means that potential impacts have been largely avoided. However, parts of Anglesey Fens SAC/Anglesey and Llyn Fens Ramsar site remain within the new Priority Area, so consideration will need to be given to whether or not wetland birds associated with the Ramsar site could be affected. Furthermore, the new Priority Area is also still within the 20km buffer zone of a number of SPAs (including the Anglesey Terns, Puffin Island and Holy Island Coast SPAs), and is also within the 40km buffer of the chough at Holy Island Coast SPA, so consideration will need to be given to whether or not birds associated with these SPAs could be affected (though the greater the distance, the lower the risk of impacts).</p> <p>New Priority Area 2</p> <p>The significant contraction in the boundaries of this new Priority Area also means that potential impacts have been largely avoided. Furthermore, this area is now only allocated for potential solar development, further reducing the risk of impacts. However, the southern edge of the new Priority Area is within the buffer of the North Cardigan Bay SPA, so any solar farm HRA will need to ensure that the proposed location is not a particularly important foraging or roosting area for birds associated with the SPA. That said, impacts would be expected to be minimal at worst.</p> <p>Clearly any proposed wind or solar development outside of these new Priority Areas will be harder to justify, especially if located closer to the coastal SPAs and other Natura 2000/ Ramsar sites, although that does not mean the such development proposals cannot be consented; rigorous HRA would, however, be required.</p>	<p>Following public consultation, Priority Areas 1 and 2 have been removed from the Policy.</p>
<p>003 North Wales (March 2019)</p> <p>Priority Areas 3, 4 and 15 (July 2019)</p> <p>Pre-Assessed Areas 1 and 2 (March 2020)</p>	<p>Areas including all areas of greatest opportunity, where there is also grid and road access.</p> <p>Avoiding the built-up areas around Wrexham.</p> <p>Areas contiguous with AONB and National Park will need further landscape and visual assessment.</p> <p>Proximity to built-up area around Wrexham will need further consideration, especially with regard to Wind energy.</p>	<p>Within the Priority Area</p> <p>The Elwy Valley Woods SAC is located within the larger of the two areas covered by this PA within the north-east of Wales; however, the SAC is outside of any areas shaded dark green, so renewables development here is unlikely (also, neither birds nor bats are part of the designation). The other (smaller) part of the PA to the east contains Johnstown Newt Sites SAC within its boundary, but again the SAC is largely outside of any areas shaded dark green and should also not be significantly affected by being within this PA.</p> <p>Outside the Priority Area</p> <p>The northern edge of the larger of the two PAs within the north-east of Wales is adjacent to Liverpool Bay SPA, whilst the south-western edge abuts the Migneint-Arenig-Dduallt SAC/SPA and the south-eastern edge is next to the Berwyn and South Clwyd Mountains SAC/ Berwyn SPA. Given that there are some areas of 'greatest opportunity' for renewables next to these sites, it will be important to ensure that any wind farms that might be proposed here properly consider the implications for birds associated with these SPAs. Alternatively, the classification of these areas as being of 'greatest opportunity' could be reviewed.</p>	<p>It is clear from a simple comparison between the original Priority Area map and the refined version that the boundaries of the new Priority Areas in this part of North Wales (new Priority Areas 3, 4 and 15) have been substantially reduced in order to avoid impacts on the Natura 2000/ Ramsar sites. Furthermore, the distinction between those areas allocated purely for solar development and those allocated for wind and solar has made it easier to assess the implications for Natura 2000/ Ramsar sites.</p> <p>New Priority Area 3</p> <p>The significant contraction in the boundaries of the new Priority Area away from the highly designated coastal parts of North Wales, and from the Elwy Valley Woods SAC, means that potential impacts have been largely avoided. However, the new Priority Area is still within the 20km buffer zone of a number of SPAs (including the Liverpool Bay and Puffin Island SPAs), so consideration will need to be given to whether or not birds associated with these SPAs could be affected (though the greater the distance, the lower the risk of impacts).</p> <p>New Priority Area 4</p>	<p>A comparison between the PAs and the new Pre-Assessed Areas shows a large reduction due to the removal of the PA's for solar Energy as a result of public consultation (PA 4 has been removed completely)</p> <p>Pre-Assessed Area 1 (previously PA 3)</p> <p>Pre-Assessed Area 1 has been reduced in size to remove the solar energy only section at the northwest corner. However, it is still within the buffer zone of a number of SPAs (such as Migneint-Arenig-Dduallt SPA and a number of coastal SPAs) as well as Elwy Valley Woods SAC, Creuddyn Peninsula Woods SAC and Gwydyr Forest Mines SAC.</p> <p>Pre-Assessed Area 2 (previously PA 15)</p> <p>Pre-Assessed Area 2 has been reduced in size to remove the solar energy only section at the southwest corner. This reduction in the boundaries has removed it from the buffer</p>

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		<p>The other (smaller) area to the east lies adjacent to the Berwyn and South Clwyd Mountains SAC, Alyn Valley Woods SAC and Deeside and Buckley Newt sites SAC; however, it is not considered that the qualifying features of these sites would be significantly affected by renewables development within the adjacent PA. More significant is the fact that the northern edge of this part of the PA (which includes a significant amount of dark green shading) is located within the buffer zones of both the Dee Estuary SPA/SAC/Ramsar site and the Berwyn SPA, so consideration would need to be given to birds from these sites when applying for renewables development here. Again, consideration should be given to reviewing the classification of these areas as being of 'greatest opportunity'.</p>	<p>The significant contraction in the boundaries of this new Priority Area also means that potential impacts have been largely avoided, including completely avoiding Johnstown Newt Sites SAC, which was previously within its boundary. Furthermore, this area is now only allocated for potential solar development, further reducing the risk of impacts. However, the northern edge of the new Priority Area is still within the buffer of the Mersey Estuary and Dee Estuary SPAs, so any solar farm HRA will need to ensure that the proposed location is not a particularly important foraging or roosting area for birds associated with the SPA. That said, impacts would be expected to be minimal at worst.</p> <p>New Priority Area 15 The significant contraction in the boundaries of the new Priority Area away from the Migneint-Arenig-Dduallt SAC/SPA and the Berwyn and South Clwyd Mountains SAC/ Berwyn SPA, and the fact that the part of the new Priority Area closest to the former is allocated to solar energy only, means that potential impacts have been largely avoided. However, the new Priority Area is still within the 20km buffer zone of both of these SPAs, so consideration will need to be given to whether or not birds associated with them could be affected (though the greater the distance, the lower the risk of impacts).</p> <p>Clearly any proposed wind or solar development outside of these new Priority Areas will be harder to justify, especially if located closer to the SPAs and other Natura 2000/ Ramsar sites, although that does not mean the such development proposals cannot be consented; rigorous HRA would, however, be required.</p>	<p>zone of Lyn Tegid Ramsar site and moved it further away from the Migneint-Arenig-Dduallt SPA/SAC and the Berwyn and South Clwyd Mountains SAC/ Berwyn SPA, However, the Pre-Assessed Areas are still within the 20km buffer zone of both of these SPAs.</p>
<p>004 Mid & West Wales (Ceredigion) (March 2019)</p> <p>Priority Areas 9 and 10 (July 2019)</p> <p>Pre-Assessed Areas 6 and 7 (March 2020)</p>	<p>Areas including all areas of greatest opportunity, where there is also grid and road access.</p> <p>Area of variable opportunity that contain grid and access routes included at this stage.</p> <p>Proximity to Landmap visual sensory outstanding and high to the East.</p> <p>Proximity to National Park to the South West.</p> <p>Grid and access constraints may make deliverability a challenge.</p>	<p>Within the Priority Area The northernmost of the two areas that make up this PA (see Figure 2 page 3) includes Rhos Talglas SAC within its boundaries, whilst the southern part incorporates Rhos Llawr-cwrt SAC as well as part of the River Teifi SAC. Whilst these sites could potentially be affected by wind or solar farms, they are generally outside of areas of 'greatest opportunity' for renewables development and should therefore be avoided. Given that these are wetland habitat-based designations, the main impacts, if any, would be hydrological (assuming no habitat loss). Having these sites within the PA is therefore unlikely to be a serious issue, although further assessment would certainly be required if wind or solar farms are proposed nearby.</p> <p>Outside the Priority Area The northernmost of these two areas is within the buffer zones of the Northern Cardigan Bay SPA, the Elenydd SAC/ SPA and the Mynydd Mallaen SAC/SPA; therefore, any wind farm development within those parts of the PA closest to these SPAs would need careful consideration. Similarly, this part of the PA is also within the buffer zone around the Cors Caron SAC/Ramsar site, owing to the presence of birds within the Ramsar citation. Any wind farm development within this part of the PA would therefore also need to consider the implications for birds from this site. In contrast, the southern area included within this PA has no Natura 2000/ Ramsar sites adjacent to it, although the very northern tip of the area is within the buffer zone of the Northern Cardigan Bay SPA, so again wind farm development here would need to take that into consideration.</p>	<p>It is clear from a simple comparison between the original Priority Area map (see Appendix A) and the refined version (see Figure 1, Appendix B) that the boundaries of the new Priority Areas in this part of West Wales (new Priority Areas 9 and 10) have been substantially reduced in order to avoid impacts on the Natura 2000/ Ramsar sites.</p> <p>New Priority Area 9 Whilst the reduction in the boundaries of this new Priority Area has been less significant than for other new Priority Areas, the contraction away from the Northern Cardigan Bay SPA means that potential impacts have been largely avoided. However, Rhos Talglas SAC remains within the new Priority Area, so consideration will need to be given to whether or not this site could be affected (though it is very unlikely that any wind or solar development would be consented within or close to this SAC). Furthermore, the new Priority Area is also still within the 20km buffer zone of a number of sites (including the Cors Caron Ramsar site and the Northern Cardigan Bay SPA), and is also within the 40km buffer of the chough at Bird's Rock SPA, so consideration will need to be given to whether or not birds associated with these sites could be affected (though the greater the distance, the lower the risk of impacts).</p> <p>New Priority Area 10 Whilst the reduction in the boundaries of this new Priority Area has, as with new Priority Area 9, been less noticeable than for other new Priority Areas, potential impacts have nevertheless been largely avoided. However, the new Priority Area does still incorporate Rhos Llawr-cwrt SAC as well as part of the River Teifi SAC, so consideration will need to be given to whether or not these sites could be affected (though it is very unlikely that any wind or solar development would be consented within or close to these SACs). That said, impacts would be expected to be minimal at worst. Clearly any proposed wind or solar development outside of these new Priority Areas will be harder to justify, especially if located closer to the coastal SPAs and other Natura 2000/ Ramsar sites, although that</p>	<p>A comparison between the PAs and the new Pre-Assessed Areas shows a large reduction due to the removal of the PA's for solar Energy as a result of public consultation.</p> <p>Pre-Assessed Area 6 (previously PA 9) Pre-Assessed Area 6 has the same boundary as PA 9. The Rhos Talglas SAC remains within the Area and it is still within the buffer zone of a number of coastal SPA/ SACs (such as Dyfi Estuary SPA and Cardigan Bay SAC) as well as a number of SACs (including the Cors Caron SAC/ Ramsar site, Elenydd SAC/SPA and Grogwynion SAC). The Area is also within the 40km buffer of the chough at Bird's Rock SPA and Bird's Rock SPA (chough).</p> <p>Pre-Assessed Area 7 (previously PA 10) Pre-Assessed Area 7 has been reduced in size to remove the solar energy only section at the northern end. However, it still incorporates Rhos Llawr-cwrt SAC as well as part of the River Teifi SAC. It is also within the buffer of a number of coastal SPAs (such as Bury Inlet SPA/Ramsar site and Carmarthen Bay SPA) and North Pembrokeshire Woodlands SAC and Pembrokeshire Bat Sites and Bosherton Lake SAC.</p>

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<p>005 Mid & West Wales (Powys) (March 2019)</p> <p>Priority Areas 5, 6, 7 and 8 (July 2019)</p> <p>Pre-Assessed Areas 3, 4 and 5 (March 2020)</p>	<p>Areas including all areas of greatest opportunity, where there is also grid and road access. Area of variable opportunity with particularly high wind speed also included.</p> <p>Consideration of constraints in England.</p> <p>Proximity to Landmap visual sensory outstanding and high to the South.</p> <p>Grid and access constraints may make deliverability a challenge.</p>	<p>Within the Priority Area</p> <p>This PA is spread out over a large area of mid-Wales and includes four discrete areas. Only three Natura 2000/ Ramsar sites are within the boundaries of this PA: Mynydd Epynt SAC, Rhos Goch SAC and the very northern part of the Elenydd-Mallaen SPA.</p> <p>Whilst these sites are largely avoided by the dark green areas of 'greatest opportunity' for renewables development, there remains a risk of significant impact, especially for the birds associated with the SPA should wind farm development be consented in this area (or close to it).</p> <p>Outside the Priority Area</p> <p>The northernmost of the four parts of this PA is within the buffer zone of the Berwyn SPA, so there is the potential for wind farm developments in this part of the PA to affect the qualifying bird species from this site. Similarly, the large central section of the PA is within the buffer zone of the Elenydd-Mallaen SPA, so again there is the potential for impacts upon this site. A total of five SACs (Coedydd Llawr-y-glyn, Montgomery Canal, Elan Valley Woodlands, Elenydd and the River Wye) are adjacent to this PA; however, it is considered unlikely that these sites would be significantly affected (especially given that neither birds nor bats are part of the designations).</p>	<p>does not mean the such development proposals cannot be consented; rigorous HRA would, however, be required.</p> <p>It is clear from a simple comparison between the original Priority Area map and the refined version that the boundaries of the new Priority Areas in Mid Wales/Powys (new Priority Areas 5, 6, 7 and 8) have been substantially reduced in order to avoid impacts on the Natura 2000/ Ramsar sites. The exception is new Priority Area 5, which has actually been extended north-westwards, albeit into an area without Natura 2000/ Ramsar sites (though it is now within the buffer zone of one SPA where previously it was not).</p> <p>New Priority Area 5</p> <p>Whilst the boundaries of this new Priority Area have actually expanded slightly, rather than contracted, this has not had major implications for the assessment, except that the new Priority Area is now not only within the 20km buffer zone of Berwyn SPA, but is also now just within the buffer of the Migneint-Arenig-Dduallt SPA; so consideration will need to be given to whether or not birds associated with these SPAs could be affected (though the greater the distance, the lower the risk of impacts).</p> <p>New Priority Area 6</p> <p>The contraction in the eastern boundary of this new Priority Area has not had major implications for the assessment, as it is the proximity of the western boundary to the Elenydd-Mallaen SPA that is the more important issue. Whilst the implications are no worse than they were in the previous iteration of the maps, the fact that the western edge of the new Priority Area is still within the buffer of this SPA means that consideration will still need to be given to whether or not birds associated with this SPA could be affected.</p> <p>New Priority Area 7</p> <p>The significant contraction in the boundaries of the new Priority Area has actually had limited impact on the assessment, as this has not taken the new Priority Area away from any SPAs or Ramsar sites, so the potential impacts continue to be minimal. However, Rhos Goch SAC remains within the new Priority Area, so consideration will need to be given to whether or not this site could be affected (though it is very unlikely that any wind development would be consented within or close to this SAC, and distance effects are unlikely given that the qualifying features are all wetland habitats and not mobile species). Furthermore, the new Priority Area is also still within the buffer zone of the River Wye SAC; however, it is considered highly unlikely that this SAC would be significantly affected (especially given that neither birds nor bats are part of the designation).</p> <p>New Priority Area 8</p> <p>The significant contraction in the boundaries of this new Priority Area has actually had limited impact on the assessment, although it has meant that the new Priority Area is now completely outside the buffer zone of the Elenydd-Mallaen SPA. However, Mynydd Epynt SAC remains within the new Priority Area, so consideration will need to be given to whether or not this site could be affected (though it is very unlikely that any wind development would be consented within or close to this SAC, and distance effects are unlikely given that the qualifying feature is slender green feather-moss, a species of upland flush habitats very unlikely to be affected beyond a very local buffer area). Furthermore, the new Priority Area is also still within the buffer zone of the River Wye SAC; however, it is considered highly unlikely that this SAC would be significantly affected (especially given that neither birds nor bats are part of the designation).</p>	<p>A comparison between the PAs and the new Pre-Assessed Areas shows a large reduction due to the removal of PA8 and reduction in size of Pre-Assessed Area 4 (previously PA 6).</p> <p>Pre-Assessed Area 3 (previously PA 5)</p> <p>Pre-Assessed Area 3 has the same boundary as PA 5. The Area is within the buffer zone of Berwyn and South Clwyd Mountains SAC and Berwyn SPA, as well as Coedydd Llawr-y-glyn SAC and Tanat and Vyrnwy Bat Sites SAC. The Area is also within the 40km buffer of the chough at Bird's Rock SPA and Bird's Rock SPA (chough).</p> <p>Pre-Assessed Area 4 (previously PA 6)</p> <p>Pre-Assessed Area 4 has reduced in size. This has moved it further away from the Elan Valley Woodlands SAC and Elenydd SAC and therefore direct impacts on these sites have now been avoided. The River Wye (Wales) SAC is still within the Area and is also within the buffer of the Montgomery Canal SAC.</p> <p>Pre-Assessed Area 5 (previously PA 7)</p> <p>Pre-Assessed Area 5 has the same boundary as PA 7. Rhos Goch SAC remains within the Area and is also still within the buffer zone of the River Wye SAC.</p>

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<p>006 Mid & West Wales (Pembs) (March 2019)</p> <p>Priority Areas 11 and 12 (July 2019)</p> <p>Pre-Assessed Area 8 (March 2020)</p>	<p>Areas including all areas of greatest opportunity, where there is also grid and road access. Area of variable opportunity with particularly high wind speed also included.</p> <p>Proximity to National Park.</p> <p>Potential impact of greenlink of future grid availability should be considered.</p> <p>Radar.</p>	<p>Within the Priority Area</p> <p>Only one Natura 2000/ Ramsar site, the Cleddau Rivers SAC, is located within the boundaries of this large PA within central Pembrokeshire. However, this site is very unlikely to be significantly affected by renewables development (it is avoided by most areas of dark green shading), unless the installation of turbines and/or solar panels led to major mobilisation of sediment into the river (which is very unlikely).</p> <p>Outside the Priority Area</p> <p>This PA poses a more significant risk to nearby SPAs (namely Skomer, Skokholm and the seas off Pembrokeshire, Castlemartin Coast, Carmarthen Bay, and Burry Inlet SPA/Ramsar site) and to SAC sites directly adjacent to its border (North West Pembrokeshire Commons, Preseli, Gweunydd Blaencleddau, River Teifi, and Yerboston Tops). However, again the risks are relatively small, as the majority of the PA has deliberately been drawn inland from the coast, specifically because this is where the majority of important Natura 2000/ Ramsar sites are located. Nevertheless, some consideration of the implications for SPA birds of any wind farms in this area will be required.</p>	<p>Clearly any proposed wind or solar development outside of these new Priority Areas will be harder to justify, especially if located closer to Natura 2000/ Ramsar sites, although that does not mean the such development proposals cannot be consented; rigorous HRA would, however, be required.</p> <p>It is clear from a simple comparison between the original Priority Area map and the refined version that the boundaries of the new Priority Areas in this part of Southwest Wales (new Priority Areas 11 and 12) have been substantially reduced in order to avoid impacts on the Natura 2000/ Ramsar sites. Furthermore, the distinction (on the new Priority Areas map) between those areas allocated purely for solar development (in this case new Priority Area 12) and those allocated for wind and solar (new Priority Area 11) has made it easier to assess the implications for Natura 2000/ Ramsar sites.</p> <p>New Priority Area 11</p> <p>The contraction in the boundaries of this new Priority Area means that potential impacts have been further avoided, though not significantly so (as impacts were already expected to be low). However, the western part of the new Priority Area remains within the 20km buffer zone of the Carmarthen Bay SPA, and is also within the 40km buffer of the chough at a number of SPAs (including Skomer Skokholm & the seas off Pembrokeshire and Castlemartin Coast), so consideration will need to be given to whether or not birds associated with these SPAs could be affected (though the greater the distance, the lower the risk of impacts).</p> <p>New Priority Area 12</p> <p>The significant contraction in the boundaries of this new Priority Area also means that potential impacts have been largely avoided. Furthermore, this area is now only allocated for potential solar development, further reducing the risk of impacts. Whilst the Cleddau Rivers SAC remains located within the boundaries of this new Priority Area, this site is very unlikely to be significantly affected by solar development, unless the installation of solar panels were to lead to major mobilisation of sediment into the river (which is considered unlikely) thus potentially affecting its river-based qualifying features such as otters, lampreys and floating water-crowfoot.</p> <p>Clearly any proposed wind or solar development outside of these new Priority Areas will be harder to justify, especially if located closer to Natura 2000/ Ramsar sites, although that does not mean the such development proposals cannot be consented; rigorous HRA would, however, be required.</p>	<p>Design refinement following public consultation. (Assessment is presented in Table B below) (March 2020)</p> <p>A comparison between the PAs and the new Pre-Assessed Areas shows a large reduction due to the removal of the PA's for solar Energy as a result of public consultation. PA 12 has been completely removed.</p> <p>Pre-Assessed Area 8 (previously PA 11)</p> <p>Pre-Assessed Area 8 has been reduced in size due to the removal of the section for solar energy (at the southwestern corner) and a contraction of the western boundary to avoid impacts on the Cleddau Rivers SAC. Consultation with NRW identified the eastern Cleddau river valley (part of the Cleddau Rivers SAC) as an important commuting route for bats between known roost sites. The revised western boundary therefore pulls the edge of the Pre-Assessed Area to the east of the A478, thereby avoiding impacts on commuting bats potentially utilising the valleys to the east. The Area still remains within the buffer zones of a number of coastal SPAs/SACs (such as Skomer Skokholm & the Seas off Pembrokeshire and Castlemartin Coast SPA and Carmarthen Bay and Estuaries SAC) as well as River Teifi SAC, River Tywi SAC and North Pembrokeshire Woodlands SAC, Pembrokeshire Bat Sites and Bosherton Lakes SAC and Limestone Coast of South West Wales SAC.</p>
<p>007 Mid & West Wales (Swansea) (March 2019) [see Appendix A]</p> <p>Priority Area 13 (July 2019)</p> <p>Area removed Pre-Assessed Areas (March 2020)</p>	<p>Areas including all areas of greatest opportunity, where there is also grid and road access. Area of variable opportunity with high wind speed, and existing renewable generation also included.</p> <p>Proximity to Landmap visual sensory outstanding and high areas.</p> <p>Proximity to built-up area around Llanelli.</p>	<p>Within the Priority Area</p> <p>This PA (which is assumed to be the area northwest of Swansea; see Figure 2, page 1) includes just one Natura 2000 site (Caeau Mynydd Mawr SAC) within its boundaries. Although wind farms and solar farms would be unlikely to have a major effect, as habitat loss would be limited, it is noted that this SAC is within an area of 'greatest opportunity', so care will be needed to avoid direct impacts upon this site (or indeed avoid the site altogether).</p> <p>Outside the Priority Area</p> <p>Burry Inlet SPA/Ramsar site is directly to the south of this PA, so any proposals for wind farms within the southern portion of this PA would need careful consideration (the very southern part, for instance, is entirely shaded dark green) since the potential exists for birds associated with this site to be adversely affected. Cernydd Carmel SAC is sandwiched between the two main blocks of this PA (see Figure 2, page 1), but is sufficiently far from the PA boundaries to be unaffected (especially given that neither birds nor bats are part of the designation).</p>	<p>It is clear from a simple comparison between the original Priority Area map (see Appendix A) and the refined version (see Figure 1, Appendix B) that the boundaries of the new Priority Area in this part of South Wales (new Priority Area 13) have been substantially reduced in order to avoid impacts on the Natura 2000/ Ramsar sites. Furthermore, the distinction (on the new Priority Areas map) between those areas allocated purely for solar development (as is the case with new Priority Area 13) and those allocated for wind and solar has made it easier to assess the implications for Natura 2000/ Ramsar sites.</p> <p>New Priority Area 13</p> <p>The significant contraction in the boundaries of this new Priority Area means that potential impacts have been largely avoided. Furthermore, this area is now only allocated for potential solar development, further reducing the risk of impacts. Whilst the Caeau Mynydd Mawr SAC remains located within the boundaries of this new Priority Area, it is very unlikely that any solar development would be consented within or close to this SAC, and distance effects are very unlikely given that the</p>	<p>Following public consultation, Priority Area 13 has been removed from the Policy.</p>

Areas	Rationale for selection & key elements for consideration in refinement	Recommendations for amending the original Priority Areas as set out in the initial (March 2019) assessment	Subsequent design refinement, and implications of the new Priority Areas for Solar and Wind Energy with regard to Natura 2000/ Ramsar sites (July 2019)	Design refinement following public consultation. (Assessment is presented in Table B below) (March 2020)
			<p>qualifying feature is marsh fritillary butterfly, a species of marshy grassland habitats very unlikely to be affected beyond a very local buffer area. This site is thus very unlikely to be significantly affected by solar development; in fact, solar development often provides the opportunity to create more species-rich grassland, which could provide additional food sources.</p> <p>However, the southern part of the new Priority Area remains within the 20km buffer zone of the Burry Inlet SPA/Ramsar site, so consideration will need to be given to whether or not birds associated with this site could be affected (though solar farms will have lower impacts than wind farms, and the greater the distance, the lower the risk of impacts).</p> <p>Clearly any proposed wind or solar development outside of this new Priority Area will be harder to justify, especially if located closer to the coastal SPAs and other Natura 2000/ Ramsar sites, although that does not mean the such development proposals cannot be consented; rigorous HRA would, however, be required.</p>	
<p>008 South East Wales [see Appendix A] (March 2019)</p> <p>Priority Area 14 (July 2019)</p> <p>Pre-Assessed Areas 9 and 10 (March 2020)</p>	<p>Large area, recognising varying topography, high wind speeds, good access and proximity to grid and population (and therefore energy demand). Excludes major built up areas, with the exception of Port Talbot works, given future uncertainty.</p> <p>Area of heritage coast likely to be more suitable for solar than wind.</p> <p>Radar.</p> <p>Proximity to settlements.</p> <p>Proximity to National Park in the North.</p>	<p>Within the Priority Area</p> <p>This PA (which is assumed to be the large area east of Swansea, extending as far as the western edge of Cardiff and Newport) includes five SAC sites within its boundaries: Blaen Cynon; Aberbargoed Grasslands, Cefn Cribwr Grasslands, Blackmill Woodlands and Cardiff Beech Woods. All five of them seem to be avoided by the areas of dark green shading, but in some cases these areas of 'greatest opportunity' are very nearby, so it should still be noted that any wind or solar farms in these locations will be constrained by the presence of these SACs.</p> <p>Outside the Priority Area</p> <p>The Severn Estuary SPA/SAC/Ramsar site is located to the south of this PA, so any proposals for wind farms within the south-eastern portion of the PA would be within the buffer zone of this site and would therefore need careful consideration. Similarly, the western portion of the PA is within the buffer zone of the Burry Inlet SPA/Ramsar site, so any wind farm development here would also need to be treated with caution given the risk to qualifying bird species. A number of other Natura 2000 sites are also close to the boundaries of this PA, namely: Dunraven Bay SAC, Kenfig SAC, Crymlyn Bog SAC/Ramsar site, Coedydd Nedd a Mellte SAC, the Usk Bat Sites SAC, and Coedydd Cwm Clydach SAC. Of these, the one most likely to be affected would be the Usk Bat Sites SAC. Since the PA is within the 10km buffer zone of this SAC, the potential exists for bats from it to be affected by any wind farm within the north-eastern corner of the PA (although again lesser horseshoe bats tend not to fly at turbine height, so the risk is not high).</p>	<p>It is clear from a simple comparison between the original Priority Area map (see Appendix A) and the refined version (see Figure 1, Appendix B) that the boundaries of the new Priority Area in this part of Southeast Wales (new Priority Area 14) have been substantially reduced, partly in order to avoid impacts on the Natura 2000/ Ramsar sites. Furthermore, the distinction (on the new Priority Areas map) between those areas allocated purely for solar development (red) and those allocated for wind and solar (orange) has made it easier to assess the implications for Natura 2000/ Ramsar sites.</p> <p>New Priority Area 14</p> <p>The significant contraction in the boundaries of this new Priority Area (specifically to avoid Blaen Cynon, Aberbargoed Grasslands and Cardiff Beech Woods SACs) means that potential impacts have been largely avoided. Whilst Cefn Cribwr Grasslands and Blackmill Woodlands SACs both remain located within the boundaries of a 'solar only' part of this new Priority Area, it is very unlikely that any solar development would be consented within or close to this SAC, so these sites are very unlikely to be significantly affected by solar development. Cefn Cribwr Grasslands SAC is designated for its marsh fritillary butterflies and is thus very unlikely to be adversely affected (as with Caeau Mynydd Mawr SAC, see Priority Area 13, above), whilst Blackmill Woodlands SAC is designated for its oak woodland habitat, which again would not be affected by distance effects. Nevertheless, it should still be noted that any solar farms will be constrained by the presence of these SACs.</p> <p>Even though the boundaries of the new Priority Area have contracted, the western part is still within the buffer zone of the Burry Inlet SPA /Ramsar site and the eastern part within the buffer zone of the Severn Estuary, so consideration will need to be given to whether or not birds associated with these sites could be affected (though the greater the distance, the lower the risk of impacts).</p> <p>Clearly any proposed wind or solar development outside of this new Priority Area will be harder to justify, especially if located closer to the SPAs and other Natura 2000/ Ramsar sites, although that does not mean the such development proposals cannot be consented; rigorous HRA would, however, be required.</p>	<p>A comparison between the PA and the new Pre-Assessed Areas shows a large reduction due to the removal of the PA's for solar Energy. The two large and one small solar section of PA14 have been removed completely, and the PA split into two new Pre-Assessed Areas.</p> <p>Pre-Assessed Area 9 (previously the western section of PA 14)</p> <p>Removal of the southern solar component of PA 14 has meant that Cefn Cribwr Grasslands and Blackmill Woodlands SAC are now no longer within the boundary of the Area. Pre-Assessed Area 9 is still within the buffer of SACs (such as Blackmill Woodlands SAC and Cardiff Beech Woods SAC) as well as a number of coastal SACs/SPAs (such as the Severn Estuary SPA/ Ramsar site and Bury Inlet SPA/Ramsar site).</p> <p>Pre-Assessed Area 10 (previously the eastern section of PA14)</p> <p>Removal of the large solar component to the northwest of Pre-Assessed Area 10 has meant that the buffers of Cwm Cadlan SAC and Coedydd Nedd a Mellte SAC are no longer within the Area. The Area is still within the buffers of Blaen Cynon SAC and Aberbargoed Grasslands SAC, as well as the Severn Estuary SPA and the Usk Bat sites SAC and Wye Valley and Forest of Dean Bat Sites SAC.</p>

Table B: Assessment of Pre-Assessed Areas for Wind Energy development

Pre-Assessed Area (PAA)	Natura 2000/ Ramsar sites within the buffer of a PAA	Natura 2000/ Ramsar sites potentially affected	Potential impacts	Avoidance/ mitigation measure	
1	<p>Natura 2000/ Ramsar sites within PAA: 0</p> <p>Natura 2000/Ramsar site buffers within PAA: 8</p>	<p>Elwy Valley Woods SAC</p> <p>Qualifying features: <i>Tilio-Acerion forests of slopes, screes and ravines</i></p>	<p>These three SACs are more than 3km from the PAA – no direct impacts.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): D, F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Design cabling and access routes to ensure no adverse impact on the integrity of the SAC.</p> <p>Ensure assessments are undertaken to determine the use of habitats within the PAA by bats.</p>	
		<p>Creuddyn Peninsula Woods SAC</p> <p>Qualifying features: <i>Tilio-Acerion forests of slopes, screes and ravines, semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia), Taxus baccata woods of the British Isles</i></p>	<p>Although significant adverse indirect effects are considered unlikely, any projects within this PAA will need to assess the potential for indirect adverse effects (in particular related to impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SACs and potential impacts on air quality as a result of construction activities). Potential impacts on the commuting routes and foraging areas of the lesser horseshoe bats associated with Gwydyr Forest Mines SAC (approximately 8km to the southwest) will also need to be determined.</p>		
		<p>Gwydyr Forest Mines SAC</p> <p>Qualifying features: <i>Calaminarian grasslands of the Violetalia calaminariae and lesser horseshoe bat</i></p>	<p><i>Avoidance/mitigation measures (refer to Table 6): D, F, H</i></p>		
			<p>Migneint-Arenig-Dduallt SPA</p> <p>Qualifying features: <i>Hen harrier, merlin and peregrine falcon</i></p>	<p>This SPA lies to the west of the PAA - no direct impacts.</p> <p>Any projects within the PAA will need to assess the potential for indirect adverse effects on the qualifying raptor species. Hen harrier forage over wide areas and can utilise habitats some distance from their breeding sites. The Mynydd Hiraethog SSSI is outside of the SAC, but inside the PAA. One of the features of the SSSI is hen harrier and it is considered likely that the SSSI provides supporting habitat (for example, severing as a commuting route between foraging and breeding grounds) for the Migneint SPA hen harrier population. The PAA is also likely to be utilised by merlin and peregrine falcon associated with the SPA. Potential for collision risk as well as disturbance/ displacement will need to be assessed.</p> <p>Any projects will also need to assess the potential for indirect adverse effects on SPA habitats supporting prey species (in particular related to impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SPA and potential impacts on air quality as a result of construction activities).</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): C, D, F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of the PAA for hen harrier, peregrine and merlin. [potential mitigation options could include (but are not limited to): micro-siting, reducing turbine size and spacing, or habitat enhancement off-site].</p>
		<p>Dee Estuary SPA/ Ramsar site</p> <p>Qualifying features: <i>Sandwich tern, little tern, common tern, bar-tailed godwit, redshank, shelduck, teal, pintail, oystercatcher, grey plover, knot, dunlin, black-tailed godwit, curlew, redshank, and waterbird assemblage</i></p>	<p>These sites are located to the north of the PAA - no direct impacts.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): C, D, F</i></p> <p><i>PAA specific measures:</i></p> <p>Design cabling and access routes to ensure no adverse impacts on habitats within the PAA potentially utilised by SPA species.</p> <p>Ensure assessments are undertaken to determine the use of the PAA for waterfowl and waders.</p>	
		<p>Lavan Sands, Conway Bay SPA</p> <p>Qualifying features: <i>Oystercatcher, curlew, great crested grebe, red-breasted merganser and redshank</i></p>	<p>Significant adverse indirect effects are considered unlikely for Liverpool Bay SPA and Anglesey Terns SPA. The qualifying species of these SPAs are predominately associated with coastal locations and are unlikely to regularly utilise habitats within PAA.</p>		
		<p>Anglesey Terns SPA</p> <p>Qualifying features: <i>Roseate tern, common tern, Arctic tern, and Sandwich tern.</i></p>	<p>Waders and waterfowl associated with the Dee Estuary and Lavan Sands, Conway Bay SPA have the potential to utilise habitats within the PAA for breeding and foraging, and therefore projects within this PAA will need to confirm no indirect adverse effects on these species (in particular related to loss of functionally-linked land, disturbance/displacement and collision risk).</p>		
<p>Liverpool Bay SPA</p> <p>Qualifying features: <i>Red-throated diver, little gull, little tern, common tern and common scoter.</i></p>					

2	<p>Natura 2000/ Ramsar sites within PAA: 0</p> <p>Natura 2000/Ramsar site buffers within PAA: 5</p>	<p>Migneint-Arenig-Ddualt SAC</p> <p>Qualifying features: <i>European dry heaths, Blanket bog, Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea, Natural dystrophic lakes and ponds, Northern Atlantic wet heaths with Erica tetralix, Old sessile oak woods with Ilex and Blechnum in the British Isles</i></p>	<p>These two SACs are located to the south and east of the PAA – no direct impacts are envisaged.</p> <p>Only the southern and western edges of the PAA are within the buffer, and therefore significant adverse indirect effects are considered unlikely, any projects within this PAA will still need to assess the potential for indirect adverse effects (in particular related to impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SACs and potential impacts on air quality as a result of construction activities).</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Design cabling and access routes to ensure no adverse impact on the integrity of the SAC.</p>
		<p>Berwyn and South Clwyd Mountains SAC</p> <p>Qualifying features: <i>European dry heaths, Blanket bog, semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites), transition mires and quaking bogs, calcareous and calcshist screes of the montane to alpine levels (Thlaspietea rotundifolii), calcareous rocky slopes with chasmophytic vegetation</i></p>		
		<p>Migneint-Arenig-Ddualt SPA</p>	As per PAA 1	As per PAA 1
		<p>Berwyn SPA</p> <p>Qualifying features: <i>Hen harrier, merlin and peregrine falcon and red kite</i></p>	<p>This SPA lies to the south of the PAA - no direct impacts are envisaged.</p> <p>Any projects within the PAA will need to assess the potential for indirect adverse effects on the qualifying raptor species which may utilise the PAA as a foraging resource (hen harrier and red kite can forage over wide areas and can utilise habitats some distance from their breeding sites), or as part of a commuting route between breeding and foraging grounds. Potential for collision risk as well as disturbance/ displacement will need to be assessed.</p> <p>Any projects will also need to assess the potential for indirect adverse effects on SPA habitats supporting prey species (in particular related to impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SPA and potential impacts on air quality as a result of construction activities).</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): C, D, F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of the PAA for hen harrier, merlin, peregrine and red kite. [potential mitigation options could include (but are not limited to): micro-siting, reducing turbine size and spacing, or habitat enhancement off-site]</p> <p>Ensure adequate in-combination assessment has been carried out</p>
<p>River Dee and Bala Lake SAC</p> <p>Qualifying features: <i>Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation, Atlantic salmon, floating water-plantain, brook, sea and river lamprey, bullhead and otter</i></p>	<p>This SAC lies south of the PAA - no direct impacts.</p> <p>Although significant adverse indirect effects are considered unlikely, any projects within this PAA (especially at the southern end) will need to assess the potential for indirect adverse effects the qualifying species. In particular, any hydrological links to the SAC from tributaries within the PAA which might be important for migratory fish (beyond the 5km buffer if necessary). Potential impacts on otters will also be required where potential developments are taking place upstream of watercourses throughout the catchment which includes the SAC.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of watercourses within the PAA by migratory fish and otter (where development is upstream of the SAC).</p>		
3	<p>Natura 2000/ Ramsar sites within PAA: 0</p> <p>Natura 2000/Ramsar site buffers within PAA: 6</p>	<p>Berwyn SPA</p>	As per PAA 2	As per PAA 2
		<p>Berwyn and South Clwyd Mountains SAC</p>	As per PAA 2	As per PAA 2
		<p>Migneint-Arenig-Ddualt SPA</p>	As per PAA 1	As per PAA 1
		<p>Coedydd Llawr-y-glyn SAC</p> <p>Qualifying features: <i>Old sessile oak woods with Ilex and Blechnum in the British Isles</i></p>	<p>This SAC is at the southwest side of the PAA – no direct impacts.</p> <p>Although significant adverse indirect effects are considered unlikely, any projects within the southwest side of the PAA will</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p>

			need to assess the potential for indirect adverse effects (in particular related to any hydrological links to the SAC and potential impacts on air quality as a result of construction activities).	Design cabling and access routes to ensure no adverse impact on the integrity of the SAC.
		Tanat and Vyrnwy Bat Sites SAC Qualifying feature: <i>Lesser horseshoe bat</i>	This SAC lies north of the PAA – no direct impacts. The buffer only reaches the tip of the northeast side of the PAA, and therefore significant adverse impacts on lesser horseshoe bats are considered unlikely. However, any projects within the northern section of the PAA must ensure that potential impacts on commuting and foraging lesser horseshoe bats are assessed.	<i>Avoidance/mitigation measures (refer to Table 6): D, F, H</i> <i>PAA specific measures:</i> Ensure assessments are undertaken to determine the use of the PAA for lesser horseshoe bats
		Craig yr Aderyn (Bird's Rock) SPA Qualifying feature: <i>Chough</i>	This SAC lies north of the PAA – no direct impacts. - no direct impacts. Significant adverse indirect effects are considered unlikely. Although chough will use inland areas, they are predominately associated with coastal locations and are unlikely to regularly utilise habitats within PAA.	<i>Avoidance/mitigation measures (refer to Table 6): None</i> <i>PAA specific measures: None</i>
4	Natura 2000/ Ramsar sites within PAA: 1 Natura 2000/Ramsar site buffers within PAA: 4	The River Wye (Wales) SAC Qualifying features: <i>Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation; transition mires and quaking bogs, white-clawed crayfish, sea, river and brook lamprey, twaite and Allis shad, Atlantic salmon, bullhead and otter.</i>	Although the River Wye is within the PAA, it is very unlikely that any wind development would be consented within the riverine valleys of the SAC. Any projects within this PAA will need to assess the potential for indirect adverse effects on the qualifying species. In particular, any hydrological links to the SAC from tributaries within the PAA which might be important for migratory fish (beyond the 5km buffer if necessary). Impacts on otters will also be required where potential developments are taking place upstream of watercourses throughout the catchment which includes the SAC.	<i>Avoidance/mitigation measures (refer to Table 6): F, H</i> <i>PAA specific measures:</i> Ensure assessments are undertaken to determine the use of watercourses within the PAA by migratory fish and otter (where development is upstream of the SAC).
		Montgomery Canal SAC Qualifying feature: <i>Floating water-plantain</i>	The canal lies to the north of the PAA – no direct impacts. Although significant adverse indirect effects are considered unlikely, any projects within this PAA (especially on the northern side) will need to assess the potential for indirect adverse effects the qualifying species. In particular, any hydrological links to the SAC from tributaries within the PAA.	<i>Avoidance/mitigation measures (refer to Table 6): F, H</i> <i>PAA specific measures: None</i>
		Elenydd-Mallaen SPA Qualifying features: <i>Merlin and red kite</i>	The edge of the SAC lies to the east of the PAA - no direct impacts. Any projects within the PAA will need to assess the potential for indirect adverse effects on merlin and red kite which may utilise the PAA as a foraging resource. Potential impacts on habitats supporting prey species will also need to be assessed, although given the distance from the PAA, significant adverse impacts are considered less likely on merlin and red kite.	<i>Avoidance/mitigation measures (refer to Table 6): C, D, F, H</i> <i>PAA specific measures:</i> Ensure assessments are undertaken to determine the use of the PAA for merlin and red kite. [potential mitigation options could include (but are not limited to): micro-siting, reducing turbine size and spacing, or habitat enhancement off-site].
		Elenydd SAC Qualifying features: <i>Calaminarian grasslands of the Violetalia calaminariae, blanket bog, Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea, European dry heaths, Floating water-plantain</i>	These two SACs lie to the west of the PAA – no direct impacts. Only the southwest edges of the PAA are within the buffer, and therefore significant adverse indirect effects are considered unlikely, however, any projects within this PAA will still need to assess the potential for indirect adverse effects (in particular related to impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SACs and potential impacts on air quality as a result of construction activities).	<i>Avoidance/mitigation measures (refer to Table 6): F, H</i> <i>PAA specific measures:</i> Design cabling and access routes to ensure no adverse impact on the integrity of the SAC.
		Elan Valley Woodlands SAC		

		<i>Qualifying features: Old sessile oak woods with Ilex and Blechnum in the British Isles, European dry heaths, Tilio-Acerion forests of slopes, screes and ravines</i>		
5	Natura 2000/ Ramsar sites within PAA: 1 Natura 2000/Ramsar site buffers within PAA: 1	Rhos Goch SAC <i>Qualifying features: Active raised bog, transition mires and quaking bogs; Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae); Bog woodland; Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)</i>	<p>Although Rhos Goch SAC is within the PAA, it is very unlikely that any wind development would be consented within the SAC.</p> <p>Any projects within this PAA will still need to assess the potential for indirect adverse effects such as impacts associated with cabling routes and access to the proposed development (e.g. habitat degradation), as well as any hydrological/ hydrogeological links to the SAC and potential impacts on air quality as a result of construction activities.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): A, F, G, H</i></p> <p><i>PAA specific measures:</i></p> <p>Wind farm development must be avoided within the SAC to ensure no direct adverse impacts on the qualifying features.</p> <p>Infrastructure, including cabling and access routes must be designed to ensure no adverse impact on the integrity of the SAC.</p>
		The River Wye (Wales) SAC	As per PAA 4	As per PAA 4
6	Natura 2000/ Ramsar sites within PAA: 2 Natura 2000/Ramsar site buffers within PAA: 8	Rhos Talglas SAC <i>Qualifying features: Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) and marsh fritillary butterfly</i>	<p>Although Rhos Talglas SAC is within the PAA, it is very unlikely that any wind development would be consented within the SAC.</p> <p>Any projects within this PAA will still need to assess the potential for indirect adverse effects such as impacts associated with cabling routes and access to the proposed development (e.g. habitat degradation), as well as any hydrological/ hydrogeological links to the SAC and potential impacts on air quality as a result of construction activities.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): A, F, G, H</i></p> <p><i>PAA specific measures:</i></p> <p>Wind farm development must be avoided within the SAC to ensure no direct adverse impacts on the qualifying features.</p> <p>Infrastructure, including cabling and access routes must be designed to ensure no adverse impact on the integrity of the SAC.</p>
		Elenydd-Mallaen SPA	As per PAA 4	As per PAA 4
		Cors Caron SAC/ Ramsar site <i>Qualifying features: Active raised bog, degraded raised bogs still capable of natural regeneration, Transition mires and quaking bogs, Depressions on peat substrates of the Rhynchosporion, Bog woodland and otter</i>	<p>These SACs lie to the east of the PAA – no direct impacts.</p> <p>Although significant adverse indirect effects are considered unlikely, any projects within this PAA (especially at the eastern side) will need to assess the potential for indirect adverse effects such as impacts associated with cabling routes and access to the proposed development (e.g. habitat degradation), as well as any hydrological/ hydrogeological links to the SACs and potential impacts on air quality as a result of construction activities. Impacts on otter will also be required where potential developments are taking place upstream of watercourses throughout the catchment which includes the SACs</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Design cabling and access routes to ensure no adverse impact on the integrity of the SAC.</p>
		River Teifi SAC <i>Qualifying features: Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation, Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea, brook, river and sea lamprey, Atlantic salmon, bullhead, otter and floating water-plantain</i>	<p>Although part of the SAC lies within the south-eastern side of the PAA, it is very unlikely that any wind development would be consented within the riverine valleys of the SAC.</p> <p>Any projects within this PAA, will need to assess the potential for indirect adverse effects on the qualifying species. In particular, any hydrological links to the SAC from tributaries within the PAA which might be important for migratory fish (beyond the 5km buffer if necessary). Potential impacts on otters will also be required where potential developments are taking place upstream of watercourses throughout the catchment which includes the SAC.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of watercourses within the PAA by migratory fish and otter (where development is upstream of the SAC).</p>
		Cardigan Bay SAC <i>Qualifying features: Sandbanks which are slightly covered by sea water all the time, reefs, submerged or partially</i>	<p>This SAC lies to the west of the PAA – no direct impacts.</p> <p>Future wind farm development within the PAA is unlikely to have any impacts on the marine habitats and species</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p>

		<i>submerged sea caves, bottlenose dolphin, river and sea lamprey and grey seal</i>	associated with the SAC. However, Lamprey may use watercourses within the PAA, and therefore, potential impacts on migratory fish will need to be assessed where there is a hydrological link to the SAC from tributaries within the PAA (beyond the 5km buffer if necessary).	<i>PAA specific measures:</i> Ensure assessments are undertaken to determine the use of watercourses within the PAA by migratory fish (where development is upstream of the SAC).
		Northern Cardigan Bay SPA <i>Qualifying feature: Red-throated diver</i>	These sites are to the north of the PAA – no direct impacts. Significant adverse indirect effects are considered unlikely for Northern Cardigan Bay SPA. Red-throated divers are predominately associated with coastal locations and are unlikely to regularly utilise habitats within PAA. White-fronted goose have the potential to utilise habitats within the PAA for foraging, and therefore projects within this PAA will need to confirm no indirect adverse effects on this species (in particular related to loss of functionally-linked land, disturbance/displacement and collision risk).	<i>Avoidance/mitigation measures (refer to Table 6): C, D, F</i> <i>PAA specific measures:</i> Design cabling and access routes to ensure no adverse impacts on habitats within the PAA potentially utilised by SPA species.
		Dyfi Estuary SPA <i>Qualifying feature: White-fronted goose</i>		
		Craig yr Aderyn (Bird's Rock) SPA	As per PAA 3	As per PAA 3
7	Natura 2000/ Ramsar sites within PAA:2 Natura 2000/Ramsar site buffers within PAA: 5	Rhos Llawr-cwrt SAC <i>Qualifying features: Marsh fritillary butterfly and slender green feather-moss</i>	Although Rhos Llawr-cwrt SAC is within the PAA, it is very unlikely that any wind development would be consented within the SAC itself. Marsh fritillary butterflies are not confined to SACs and are therefore vulnerable to development. The availability of more than 50ha of suitable habitat in good condition within a well-connected landscape, is the key to their continued population growth. Any projects in the PAA which fall within or close to habitat suitable for marsh fritillaries will need to assess the potential for impacts on meta-populations linked to the SAC. Impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SACs and potential impacts on air quality impacts as a result of construction activities will also need to be assessed.	<i>Avoidance/mitigation measures (refer to Table 6): A, B, F, H</i> <i>PAA specific measures:</i> Wind farm development must be avoided within the SAC to ensure no direct adverse impacts on the qualifying features. Ensure assessments are undertaken to determine the use of the PAA by marsh fritillary butterflies [potential mitigation options could include (but are not limited to): micro-siting to avoid suitable habitat or habitat enhancement off-site].
		River Teifi SAC	Although part of the SAC lies within the south-eastern side of the PAA, it is very unlikely that any wind development would be consented within the riverine valleys of the SAC. Any projects within this PAA, will need to assess the potential for indirect adverse effects the qualifying species. In particular, any hydrological links to the SAC from tributaries within the PAA which might be important for migratory fish (beyond the 5km buffer if necessary). Potential impacts on otter will also be required where potential developments are taking place upstream of watercourses throughout the catchment which includes the SAC.	<i>Avoidance/mitigation measures (refer to Table 6): F, H</i> <i>PAA specific measures:</i> Ensure assessments are undertaken to determine the use of watercourses within the PAA by migratory fish and otter (where development is upstream of the SAC).
		Cardigan Bay SAC	As per PAA 6	As per PAA 6
		Northern Cardigan Bay SPA	As per PAA 6	As per PAA 6
		North Pembrokeshire Woodlands SAC <i>Qualifying features: Old sessile oak woods with Ilex and Blechnum in the British Isles, Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) and barbastelle bat</i>	These SACs lie to the west of the PAA – no direct impacts. The buffer only reaches the western side of the PAA, and therefore significant adverse impacts on qualifying habitats and species are considered unlikely. However, any projects within the western side of the PAA must ensure that potential impacts on commuting and foraging bats are assessed. Impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the	<i>Avoidance/mitigation measures (refer to Table 6): D, F, H</i> <i>PAA specific measures:</i> Design cabling and access routes to ensure no adverse impact on the integrity of the SAC. Ensure assessments are undertaken to determine the use of the PAA for bats
		Pembrokeshire Bat Sites and Bosherton Lake SAC		

		<p><i>Qualifying features: Hard oligo-mesotrophic waters with benthic vegetation of Chara spp., greater horseshoe bat, lesser horseshoe bat and otter</i></p>	SACs and potential impacts on air quality as a result of construction activities must also be assessed.	
8	<p>Natura 2000/ Ramsar sites within PAA:0</p> <p>Natura 2000/Ramsar site buffers within PAA:16</p>	<p>Bury Inlet SPA/Ramsar site</p> <p><i>Qualifying features: Oystercatcher, knot, turnstone, pintail, shoveler, teal, wigeon, dunlin, curlew, grey plover, redshank, shelduck and waterbird assemblage</i></p>	These sites lie outside of the PAA - no direct impacts.	<p><i>Avoidance/mitigation measures (refer to Table 6): C, D, F</i></p> <p><i>PAA specific measures:</i></p> <p>Design cabling and access routes to ensure no adverse impacts on habitats within the PAA potentially utilised by SPA species.</p> <p>Ensure assessments are undertaken to determine the use of the PAA for waterfowl and waders.</p>
		<p>Carmarthen Bay SPA</p> <p><i>Qualifying features: Common scoter</i></p>	Significant adverse indirect effects are considered unlikely for Carmarthen Bay SPA, Ramsey and St David's Peninsula Coast SPA or storm petrel, chough, Manx Shearwater and Puffin associated with Skokholm & Skomer and Castlemartin Coast SPA. These species predominately inhabit coastal locations and are unlikely to regularly utilise habitats within PAA.	
		<p>Skomer Skokholm & the Seas off Pembrokeshire and Castlemartin Coast SPA</p> <p><i>Qualifying features: storm petrel, chough, short-eared owl, manx shearwater, puffin, lesser black-backed gull and waterbird assemblage</i></p>	Waders, Waterfowl and gulls associated with the SPAs have the potential to utilise habitats within the PAA for breeding and foraging, and therefore projects within this PAA will need to confirm no indirect adverse effects on these species (in particular related to loss of functionally-linked land, disturbance/displacement and collision risk).	
		<p>Ramsey and St David's Peninsula Coast SPA</p> <p><i>Qualifying feature: Chough</i></p>		
		<p>Elenydd-Mallaen SPA</p>	As per PAA 4	As per PAA 4
		<p>Cwm Doethie - Mynydd Mallaen SAC</p> <p><i>Qualifying features: Old sessile oak woods with Ilex and Blechnum in the British Isles and European dry heaths</i></p>	<p>This SAC is located to the east of the PAA – no direct impacts.</p> <p>Only the eastern most tip of the PAA is within the SAC buffer and therefore adverse indirect impacts are considered unlikely. However, any project at the eastern end of the PAA will need to assess the potential for indirect adverse effects (in particular related to impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SAC and potential impacts on air quality as a result of construction activities).</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Design cabling and access routes to ensure no adverse impact on the integrity of the SAC.</p>
		<p>Carmarthen Bay and Estuaries SAC</p> <p><i>Qualifying features: Sandbanks which are slightly covered by sea water all the time, estuaries, Mudflats and sandflats not covered by seawater at low tide, large shallow inlets and bays, Salicornia and other annuals colonizing mud and sand, Atlantic salt meadows (Glauco-Puccinellietalia maritima), twaite and allis shad, sea and river lamprey and otter</i></p>	<p>This SAC lies to the south of the PAA – no direct impacts.</p> <p>Future wind farm development within the PAA is unlikely to have any impacts on the marine habitats and species associated with the SAC. However, migratory fish species may use watercourses within the PAA, and therefore, potential impacts on these species will need to be assessed where there is a hydrological link to the SAC from tributaries within the PAA (beyond the 5km buffer if necessary). Potential impacts on Otters will also be required where potential developments are taking place upstream of watercourses throughout the catchment which includes the SAC.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of watercourses within the PAA by migratory fish and otter (where development is upstream of the SAC).</p>
		<p>Cleddau Rivers SAC</p> <p><i>Qualifying features: Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation, active raised bogs, alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae), brook, river and sea lamprey, otter and bullhead</i></p>	<p>This SAC lies to the west of the PAA – no direct impacts.</p> <p>Any projects within this PAA, will need to assess the potential for indirect adverse effects the qualifying species. In particular, any hydrological links to the SAC from tributaries within the PAA which might be important for migratory fish (beyond the 5km buffer if necessary). Potential impacts on Otters will also be required where potential developments are taking place upstream of watercourses throughout the catchment which includes the SAC.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of watercourses within the PAA by migratory fish and otter (where development is upstream of the SAC).</p>
<p>Gweunydd Blaencleddau SAC</p> <p><i>Qualifying features: Northern Atlantic wet heaths with Erica tetralix, Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae), blanket bogs, Transition</i></p>	<p>These SACs lie to the west of the PAA – no direct impacts.</p> <p>Although marsh fritillary butterflies are not confined to their SACs, meta-populations tend to be located within close proximity to each other and as such the SAC populations are</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): A, B, F, H</i></p> <p><i>PAA specific measures:</i></p>		

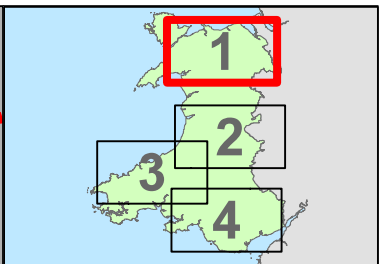
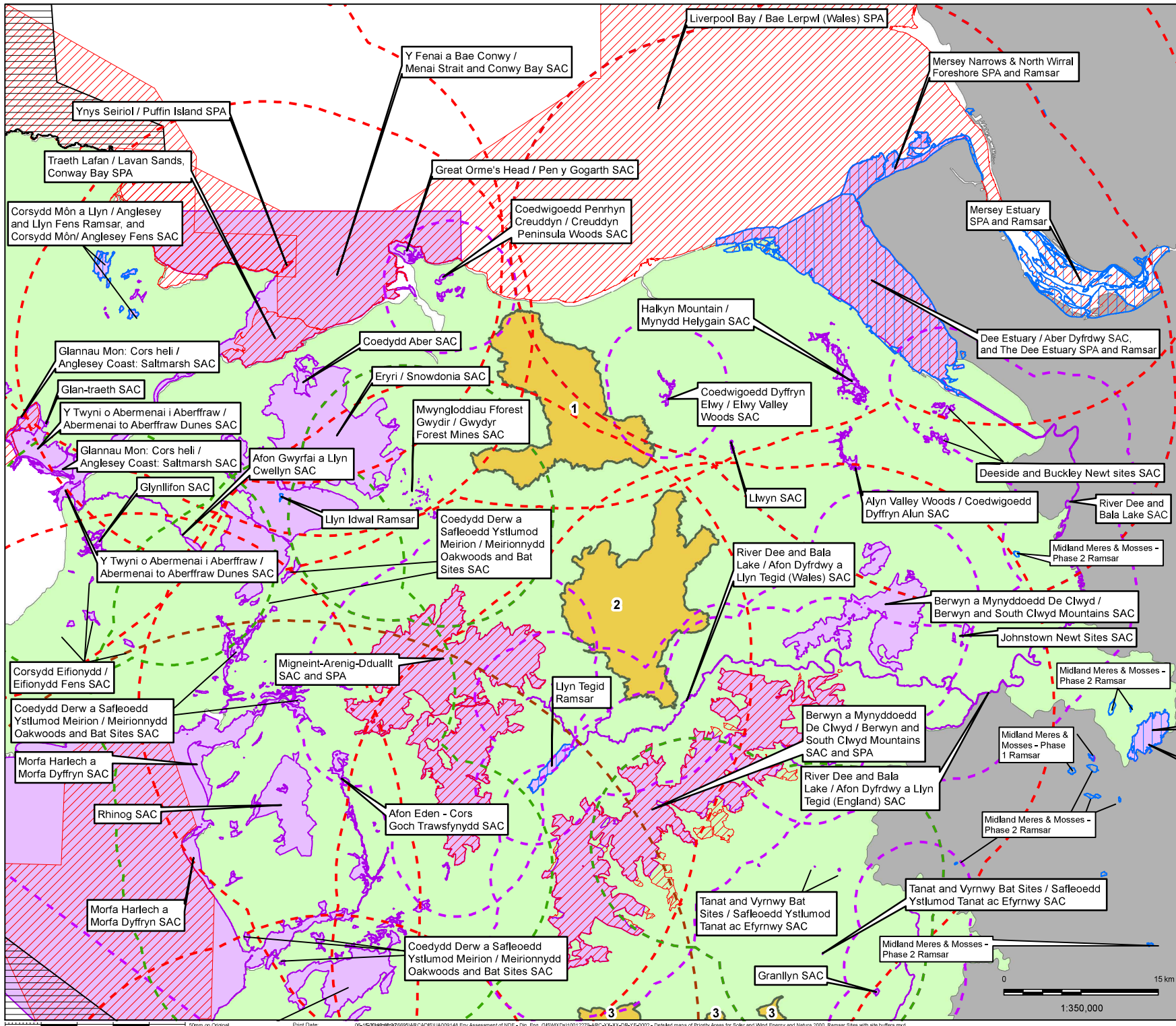
	<p><i>mires and quaking bogs, Alkaline fens, marsh fritillary butterfly and southern damselfly</i></p>	<p>not likely to extend into the PAA (several kilometres away). Southern damselflies are also confined to specific locations within the SACs and therefore are unlikely to be impacted by development within the PAA.</p>	<p>Design cabling and access routes to ensure no adverse impact on the integrity of the SAC</p>
	<p>Preseli SAC</p> <p><i>Qualifying features: Northern Atlantic wet heaths with Erica tetralix, European dry heaths, depressions on peat substrates of the Rhynchosporion, Alkaline fens, marsh fritillary butterfly, southern damselfly and slender green feather-moss</i></p>	<p>Although significant adverse indirect effects are considered unlikely, any projects within this PAA (especially at the eastern side) will need to assess the potential for indirect adverse effects such as impacts associated with cabling routes and access to the proposed development (e.g. habitat degradation), as well as any hydrological/ hydrogeological links to the SAC and potential impacts on air quality as a result of construction activities</p>	
	<p>River Teifi SAC</p> <p><i>Qualifying features: Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation, Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea, sea, brook and river lamprey, Atlantic salmon, bullhead, otter and floating water-plantain</i></p>	<p>Although the River Teifi is within the PAA, it is very unlikely that any wind development would be consented within the riverine valleys of the SAC. The River Twyi SAC lies to the south of the PAA – no direct impacts.</p> <p>Any projects within this PAA, will need to assess the potential for indirect adverse effects the qualifying species. In particular, any hydrological links to the SACs from tributaries within the PAA which might be important for migratory fish (beyond the 5km buffer if necessary). Impacts on Otters will also be required where potential developments are taking place upstream of watercourses throughout the catchment which includes the SACs.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of watercourses within the PAA by migratory fish and otter (where development is upstream of the SACs).</p>
	<p>River Tywi SAC</p> <p><i>Qualifying features: Twaite and allis shad, sea, brook and river lamprey, bullhead, otter</i></p>		
	<p>North Pembrokeshire Woodlands SAC</p>	<p>As per PAA 7</p>	<p>As per PAA 7</p>
	<p>Pembrokeshire Bat Sites and Bosherton Lakes SAC</p>	<p>As per PAA 7</p>	<p>As per PAA 7</p>
	<p>Limestone Coast of South West Wales SAC</p> <p><i>Qualifying features: Vegetated sea cliffs of the Atlantic and Baltic Coasts, Fixed coastal dunes with herbaceous vegetation ("grey dunes"), European dry heaths, semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia), caves not open to the public, submerged or partially submerged sea caves, greater horseshoe bat, early gentian and petalwort</i></p>	<p>This SAC lies to the south of the PAA – no direct impacts.</p> <p>Future wind farm development within the PAA is unlikely to have any impacts on the coastal habitats associated with the SAC. However, greater horseshoe bat may utilise habitats within the PAA as commuting and foraging routes and therefore, potential impacts on bats will need to be assessed where there are landscape links to the SAC.</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): D, F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of habitats within the PAA by bats.</p>
9	<p>Natura 2000/ Ramsar sites within PAA: 0</p> <p>Natura 2000/Ramsar site buffers within PAA: 11</p>		
	<p>Blackmill Woodlands SAC</p> <p><i>Qualifying features: Old sessile oak woods with Ilex and Blechnum in the British Isles</i></p>	<p>These SACs are located at the eastern end of the PAA – no direct impacts.</p> <p>Although significant adverse indirect effects are considered unlikely, any projects within this PAA will need to assess the potential for indirect adverse effects (in particular related to impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SACs and potential impacts on air quality as a result of construction activities).</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): D, F, H</i></p> <p><i>PAA specific measures:</i></p> <p>Design cabling and access routes to ensure no adverse impact on the integrity of the SAC.</p>
	<p>Cardiff Beech Woods SAC</p> <p><i>Qualifying features: Asperulo-Fagetum beech forests, Tilio-Acerion forests of slopes, screes and ravines</i></p>		
	<p>Severn Estuary SPA/ Ramsar site</p> <p><i>Qualifying features: Bewick's swan, greater white-fronted goose, dunlin, common redshank, common shelduck, gadwall and waterbird assemblage</i></p>	<p>The SPA lies to the southeast of the PAA – no direct impacts.</p> <p>Waders and waterfowl associated with the SPA have the potential to utilise habitats within the PAA for breeding and foraging, and therefore projects within this PAA will need to confirm no indirect adverse effects on these species (in particular related to loss of functionally-linked land, disturbance/displacement and collision risk).</p>	<p><i>Avoidance/mitigation measures (refer to Table 6): C, D, F</i></p> <p><i>PAA specific measures:</i></p> <p>Ensure assessments are undertaken to determine the use of the PAA for waterfowl and waders.</p>
	<p>Bury Inlet SPA/Ramsar site</p>	<p>As per PAA 8</p>	<p>As per PAA 8</p>
	<p>Carmarthen Bay SPA</p>	<p>As per PAA 8</p>	<p>As per PAA 8</p>

		Carmarthen Bay and Estuaries SAC	As per PAA 8	As per PAA 8
		Cefn Cribwr Grasslands SAC <i>Qualifying features: Molinia meadows on calcareous, peaty or clayey-silt-laden soils and marsh fritillary butterfly</i>	This SAC lies to the south of the PAA. Although marsh fritillary butterflies are not confined to their SACs, meta-populations tend to be located within close proximity to each other and as such the SAC populations are not likely to extend into the PAA (several kilometres away). Although significant adverse indirect effects are considered unlikely, any projects within this PAA (especially at the eastern side) will need to assess the potential for indirect adverse effects such as impacts associated with cabling routes and access to the proposed development (e.g. habitat degradation), as well as any hydrological/ hydrogeological links to the SAC and potential impacts on air quality as a result of construction activities	<i>Avoidance/mitigation measures (refer to Table 6): F, H</i> <i>PAA specific measures:</i> Design cabling and access routes to ensure no adverse impact on the integrity of the SAC
		Crymlyn Bog SAC/ Ramsar site <i>Qualifying features: Transition mires and quaking bogs, calcareous fens with Cladium mariscus and species of the Caricion davallianae, Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)</i>	This SAC is located to the western end of the PAA – no direct impacts. The buffer of the SAC only includes a small section of the western end of the PAA, and therefore significant adverse indirect effects are considered unlikely. However, any projects within this PAA will need to assess the potential for indirect adverse effects (in particular related to impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SACs and potential impacts on air quality as a result of construction activities).	<i>Avoidance/mitigation measures (refer to Table 6): D, F, H</i> <i>PAA specific measures:</i> Design cabling and access routes to ensure no adverse impact on the integrity of the SAC.
		Limestone Coast of South West Wales SAC	As per PAA 8	As per PAA 8
10	Natura 2000/ Ramsar sites within PAA: 0	Blaen Cynon SAC <i>Qualifying feature: marsh fritillary butterfly</i>	These SACs lie outside of the PAA – no direct impacts. Although marsh fritillary butterflies are not confined to their SACs, meta-populations tend to be located within close proximity to each other and as such the SAC populations are not likely to extend into the PAA (several kilometres away). Although significant adverse indirect effects are considered unlikely, any projects within this PAA (especially at the eastern side) will need to assess the potential for indirect adverse effects such as impacts associated with cabling routes and access to the proposed development (e.g. habitat degradation), as well as any hydrological/ hydrogeological links to the SAC and potential impacts on air quality as a result of construction activities.	<i>Avoidance/mitigation measures (refer to Table 6): F, H</i> <i>PAA specific measures:</i> Design cabling and access routes to ensure no adverse impact on the integrity of the SAC
		Aberbargoed Grasslands SAC <i>Qualifying features: Molinia meadows on calcareous, peaty or clayey-silt-laden soils and marsh fritillary butterfly</i>		
	Natura 2000/Ramsar site buffers within PAA: 6	Severn Estuary SPA/ Ramsar site	As per PAA 9	As per PAA 9
		Usk Bat sites SAC <i>Qualifying features: European dry heaths, degraded raised bogs still capable of natural regeneration, blanket bogs, calcareous rocky slopes with chasmophytic vegetation, caves not open to the public, Tilio-Acerion forests of slopes, screes and ravines and lesser horseshoe bat</i>	These SACs are located to the north and east of the PAA – no direct impacts. The buffers of the SACs only reach the western side of the PAA, and therefore significant adverse impacts on qualifying habitats and species are considered unlikely. However, any projects within the western side of the PAA must ensure that potential impacts on commuting and foraging bats are assessed. Impacts associated with cabling routes and access to the PAA (e.g. habitat degradation), as well as any hydrological links to the SACs and potential impacts on air quality as a result of construction activities must also be assessed.	<i>Avoidance/mitigation measures (refer to Table 6): D, F, H</i> <i>PAA specific measures:</i> Design cabling and access routes to ensure no adverse impact on the integrity of the SAC. Ensure assessments are undertaken to determine the use of the PAA for bats
		Wye Valley and Forest of Dean Bat Sites SAC <i>Qualifying features: lesser horseshoe bat and greater horseshoe bat</i>		

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Legend:

Pre-Assessed Areas	SAC or cSAC (5km)
Designation	SAC supporting lesser horseshoe bat (10km)
Ramsar Site	SAC supporting greater horseshoe and/or barbastelle bat (20km)
Candidate Special Area of Conservation (cSAC)	Ramsar Site (20km)
Special Area of Conservation (SAC)	SPA (20km)
Special Protection Area (SPA)	SPA Supporting Chough (40km)

PO2	24/03/20	Final Issue	RM	LT	DH
PO1	06/06/19	First Draft	RM	LT	DH
Rev.	Date	Description	Drawn	Check	Approv

Client WELSH GOVERNMENT

PROJECT: WALES NATIONAL DEVELOPMENT FRAMEWORK – ENVIRONMENTAL ASSESSMENTS

Llywodraeth Cymru Welsh Government

Site WALES **Client** Welsh Government
Cathays Park, Cardiff, CF10 3NA, 0300 3904400

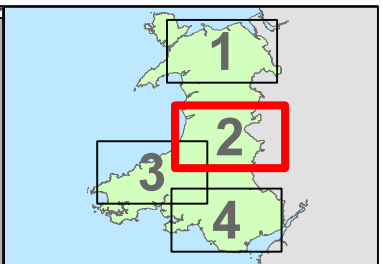
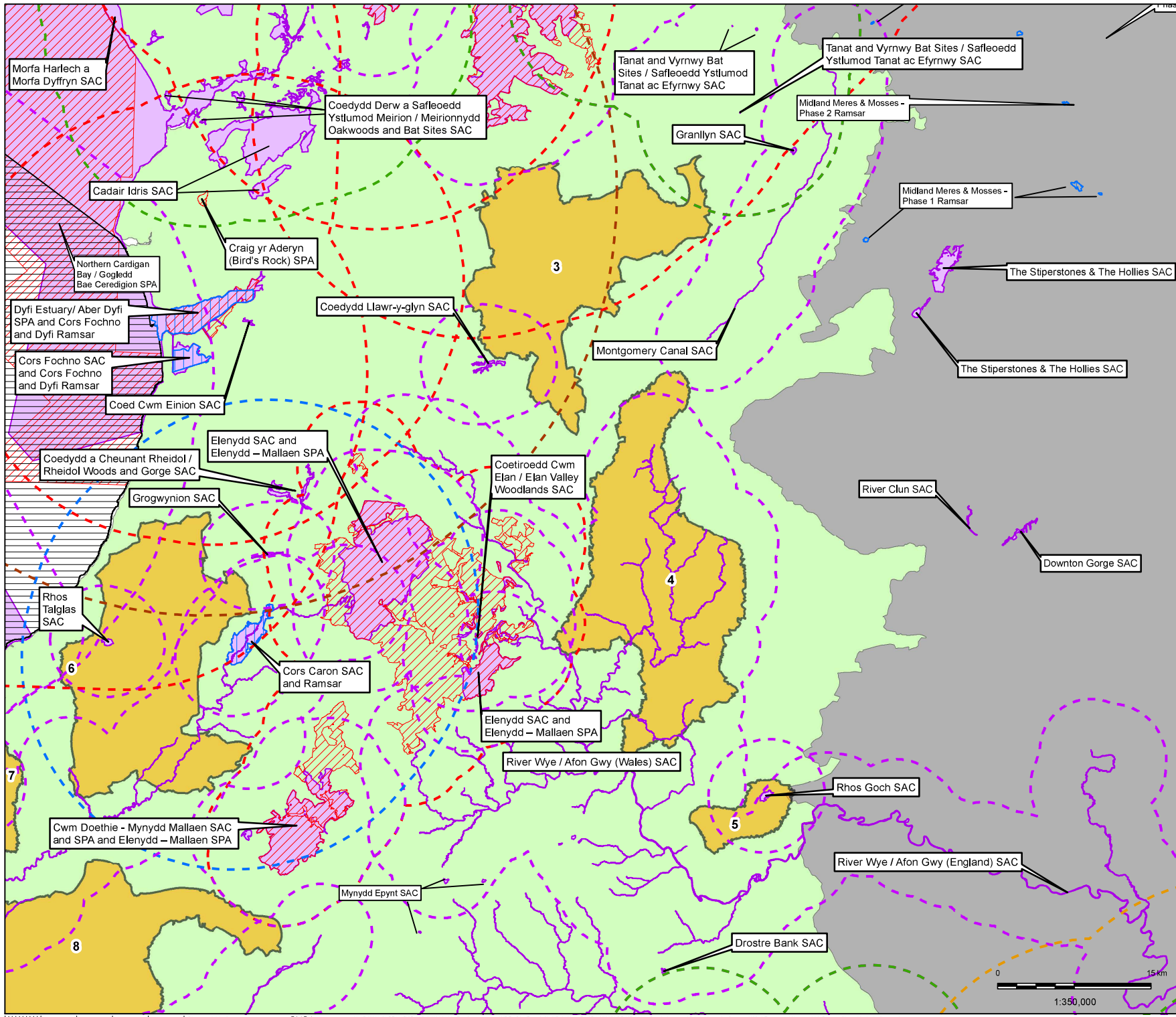
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TITLE: Figure 2: Detailed Maps of Pre-Assessed Areas and Natura 2000 / Ramsar Sites with Site Buffers Page 1 of 4

Drawn	R.MILLMAN	Date	15JUN20	Signed
Checked	L.TURLEY	Date	15JUN20	Signed
Approved	D.HOURLD	Date	15JUN20	Signed
Scale:	1:350,000	Datum:	AOD	
Original Size:	A3	Grid:	OS	
Suitability Code:	S2	Project Number:	10012279	
Suitability Description: Issued for information				
Drawing Number:	10012279-ARC -XX-XX-DR-YE-0002	Revision:	PO2	



Legend:

Pre-Assessed Areas	SAC or cSAC (5km)
Designation	SAC supporting lesser horseshoe bat (10km)
Ramsar Site	SAC supporting greater horseshoe and/or barbastelle bat (20km)
Candidate Special Area of Conservation (cSAC)	Ramsar Site (20km)
Special Area of Conservation (SAC)	SPA (20km)
Special Protection Area (SPA)	SPA Supporting Chough (40km)

PO2	24/03/20	Final Issue	RM	LT	DH
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Client WELSH GOVERNMENT

PROJECT: WALES NATIONAL DEVELOPMENT FRAMEWORK – ENVIRONMENTAL ASSESSMENTS

Ulyweddwrthi Cymru
Welsh Government

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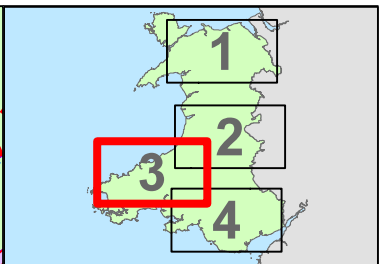
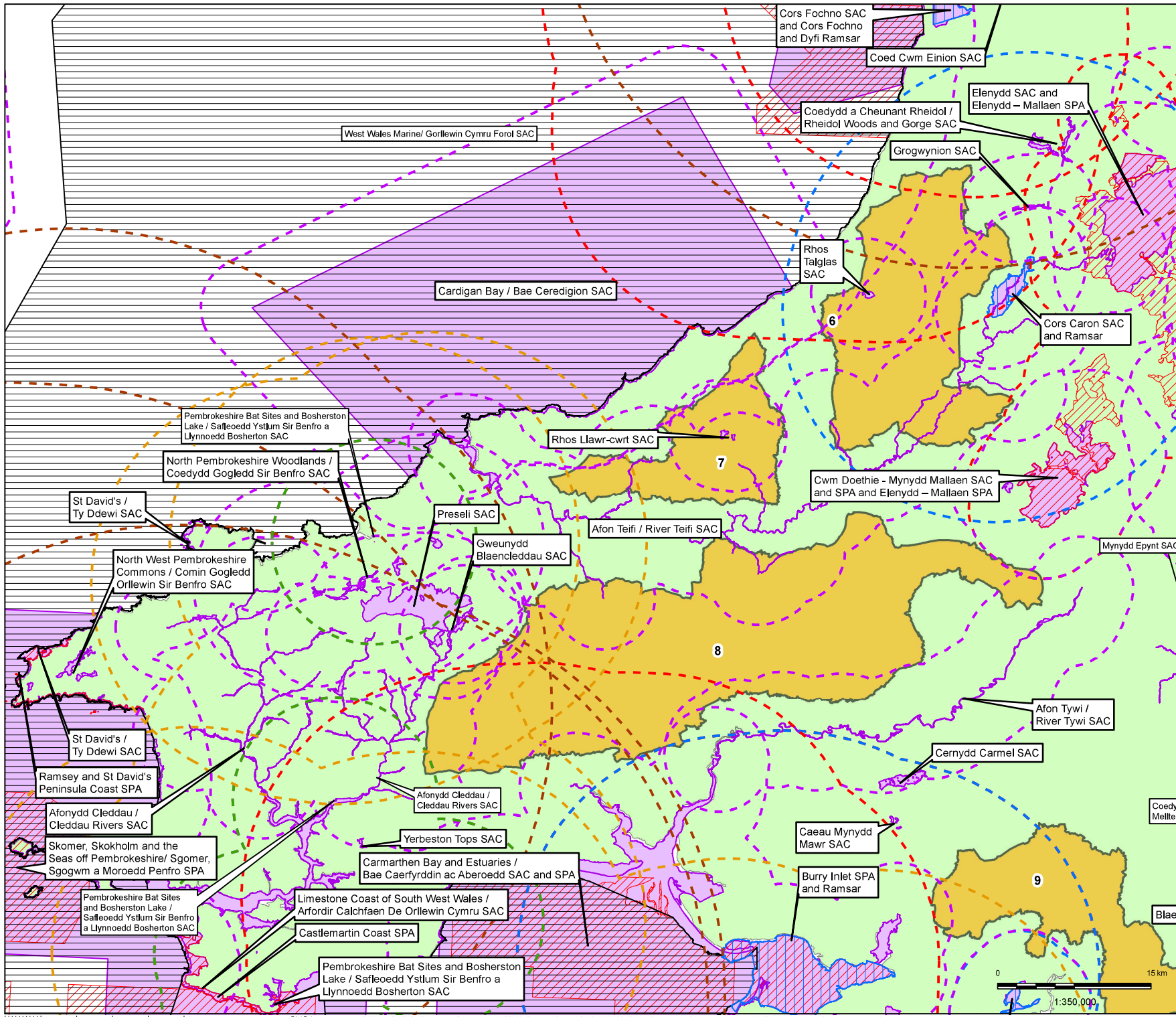
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Detailed Maps of Pre-Assessed Areas
and Natura 2000 /
Ramsar Sites with Site Buffers
Page 2 of 4

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Checked	L.TURLEY	Date	15JUN20	Signed
Approved	D.HOURE	Date	15JUN20	Signed
Scale:	1:350,000	Datum:	AOD	
Original Size:	A3	Grid:	OS	
Suitability Code:	S2	Project Number:	10012279	

Suitability Description: Issued for information

Drawn Number: 10012279-ARC -XX-XX-DR-YE-0002

Revision: PO2



Legend:

Pre-Assessed Areas	Designation Buffers
Designation	SAC or cSAC (5km)
Ramsar Site	SAC supporting lesser horseshoe bat (10km)
Candidate Special Area of Conservation (cSAC)	SAC supporting greater horseshoe and/or barbastelle bat (20km)
Special Area of Conservation (SAC)	Ramsar Site (20km)
Special Protection Area (SPA)	SPA (20km)
	SPA Supporting Chough (40km)

Rev	Date	Description	Drawn	Check	Approv
P02	24/03/20	Final Issue	RM	LT	DH
P01	06/06/19	First Draft	RM	LT	DH

Client WELSH GOVERNMENT

PROJECT: WALES NATIONAL DEVELOPMENT FRAMEWORK – ENVIRONMENTAL ASSESSMENTS

Llywodraeth Cymru
Welsh Government

Site WALES

Client Welsh Government
Celtic Park
Cardiff
CF10 3NQ
0300 3904400

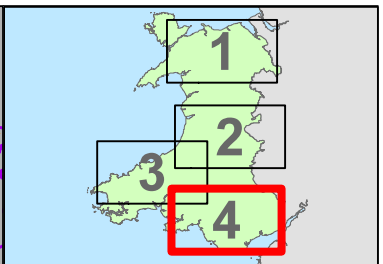
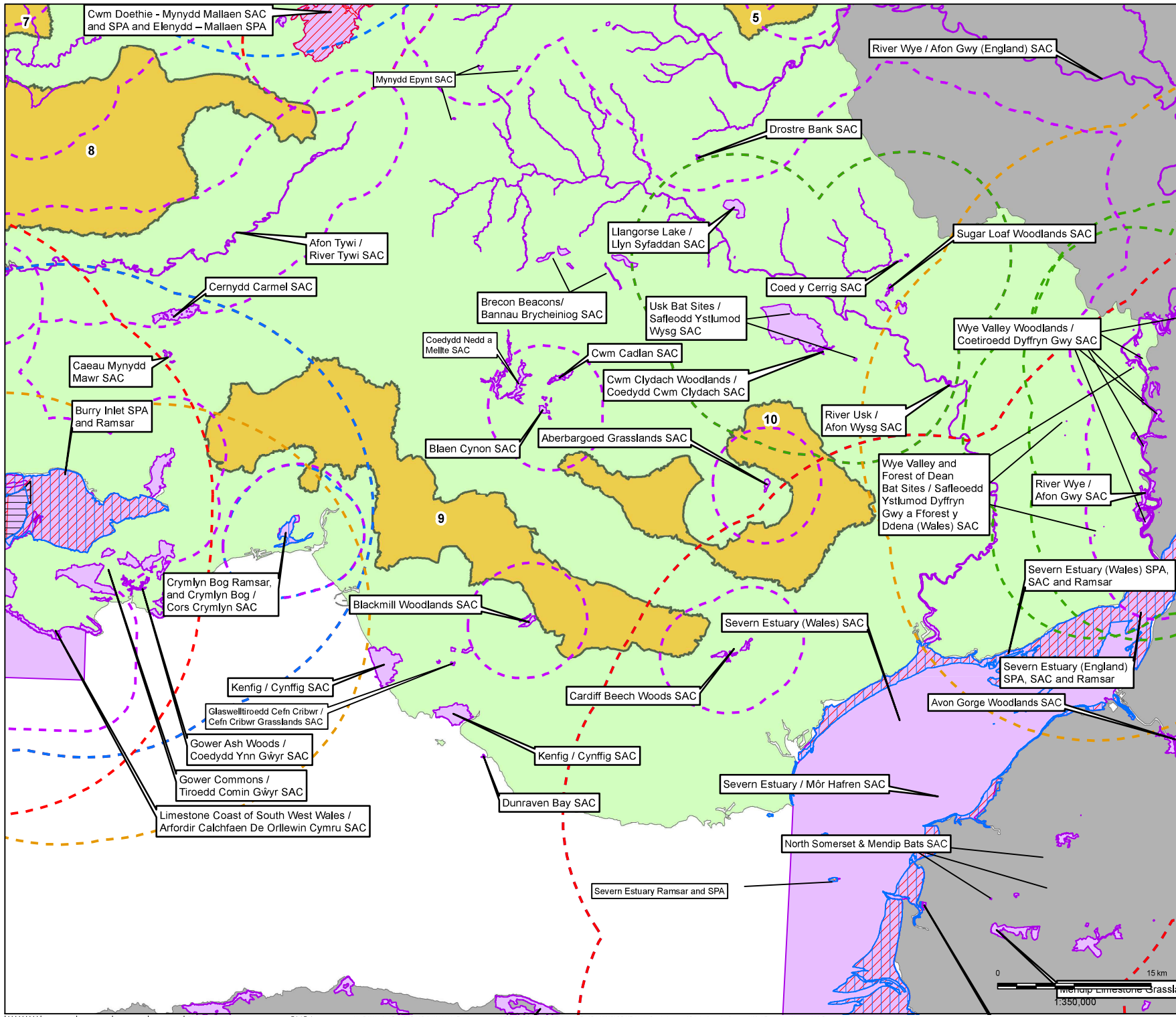
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TITLE: Figure 2: Detailed Maps of Pre-Assessed Areas and Natura 2000 / Ramsar Sites with Site Buffers Page 3 of 4

Drawn	R.MILLMAN	Date	15JUN20	Signed
Checked	L.TURLEY	Date	15JUN20	Signed
Approved	D.HOUD	Date	15JUN20	Signed
Scale:	1:350,000	Datum:	AOD	
Original Size:	A3	Grid:	OS	
Suitability Code:	S2	Project Number:	10012279	
Suitability Description: Issued for information				
Drawn Number:	10012279-ARC-XX-XX-DR-YE-0002	Revision:	P02	



Legend:

	Pre-Assessed Areas		SAC or cSAC (5km)
	Ramsar Site		SAC supporting lesser horseshoe bat (10km)
	Candidate Special Area of Conservation (cSAC)		SAC supporting greater horseshoe and/or barbastelle bat (20km)
	Special Area of Conservation (SAC)		Ramsar Site (20km)
	Special Protection Area (SPA)		SPA (20km)
			SPA Supporting Chough (40km)

PO2	24/03/20	Final Issue	RM	LT	DH
PO1	05/06/19	First Draft	RM	LT	DH
Rev.	Date	Description	Drawn	Check	Approv

Client WELSH GOVERNMENT

PROJECT: WALES NATIONAL DEVELOPMENT FRAMEWORK – ENVIRONMENTAL ASSESSMENTS

Llywodraeth Cymru
Welsh Government

Site WALES

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TITLE: Figure 2: Detailed Maps of Pre-Assessed Areas and Natura 2000 / Ramsar Sites with Site Buffers
Page 4 of 4

Drawn	R.MILLMAN	Date	15JUN20	Signed
Checked	L.TURLEY	Date	15JUN20	Signed
Approved	D.HOURE	Date	15JUN20	Signed
Scale:	1:350,000	Datum:	AOD	
Original Size:	A3	Grid:	OS	
Suitability Code:	S2	Project Number:	10012279	
Suitability Description: Issued for information				
Drawing Number:	10012279-ARC-XX-XX-DR-YE-0002			Revision:
				PO2