BRIDGEND COUNTY
BOROUGH COUNCIL

Sustainability Appraisal of the Bridgend Local Development Plan

Pre-Deposit Proposals

November 2008

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Appendices

1   Introduction

1.1   This document reports on the joint sustainability appraisal (SA) and strategic environmental assessment (SEA) of the Pre-Deposit Proposals (November 2008) of the Bridgend Local Development Plan (LDP). The SA/SEA is being prepared on behalf of Bridgend County Borough Council, by consultants Baker Associates. It is intended to provide an examination of whether implementing the LDP, at this stage, is on course to help deliver sustainable development in Bridgend County Borough.

1.2   The purpose of the Pre-Deposit Proposals document is to set out the vision, strategic options and preferred strategy, including policies of the LDP. These need to show how the LDP will strategically guide development around the County Borough to ensure that its delivery helps achieve more sustainable development. For instance, through helping creating a pattern of development that reduces the need to travel, allows new homes to be built to meet housing needs and providing diverse local employment opportunities.

1.3   SA/SEA is the process by which the influence that a land use or spatial plan (in this case the LDP) would have over development is assessed, according to the likely contribution to the desirable environmental, economic and social objectives that are embraced by a concern to achieve greater sustainability.

1.4   The SA/SEA is a combined process meeting both the practice requirements for SA as set out in guidance, and the regulatory requirements of SEA set out in legislation. The combined process is referred to simply as SA.

1.5   The SA is to provide a check on the approach set out in the Pre-Deposit Proposals to identify possible sustainability impacts, both positive and negative. With the overall purpose of helping to create a more sustainable plan. This report documents the likely implications on sustainable development of the Pre-Deposit Proposals and where suitable makes recommendations for changes. This SA Report will accompany the Pre-Deposit Proposals to consultation and help inform possible consultation discussions and the content of the LDP as it moves towards a deposit version.

1.6   The SA has already gone through several stages. An SA was undertaken of the Growth Options that make up part of the Pre-Deposit proposals document. A scoping report to provide the background to the SA process was prepared in 2006. This was made available for public consultation, and the responses received at that stage incorporated into the SA and revised Scoping Report. This earlier report can provide a useful supplementary document to the SA process and is available for download from the Bridgend LDP website.

2   The approach to the sustainability appraisal

2.1   The SA, at this stage, uses an approach that is commensurate with the content of the LDP Pre-Deposit Proposals. As the LDP addresses issues at a strategic level, it is only suitable to consider sustainability issues using a similarly broad approach. Trying to appraise at any finer level of detail would result in too many assumptions having to be made on sustainability impacts due to the possibility of great variation in how strategic policies are implemented.

2.2   This means that the SA concentrates on the key aspects of the *Pre-Deposit Proposals* namely the strategic options for growth and the proposed policy approaches. Therefore, the SA Report will concentrate on addressing key matters arising from the assessment process and it is not intended to meet the full content requirements as set out in the Wales SEA Regulations Schedule 2.

2.3   The method of sustainability appraisal uses the framework of sustainability objectives, see section 4, as the basis of assessment. Using these objectives as a general description of what more sustainable development means for the LDP, it is possible to consider whether the LDP is helping to make a contribution to more sustainable development.

2.4   The SA at this stage has an important role to play, not only in considering the approach set out in these parts of the LDP, and its coverage of the sustainable development agenda. It also, and perhaps more significantly in this instance, considers the whole approach to the plan making and the spatial strategy put forward at this stage in LDP preparation. The reason for this is sustainable development cannot be secured unless the approach to plan making sets out an appropriately robust strategy. That is one based on up-to-date and relevant evidence that guides all proposed new development to the most suitable locations as part of a sustainable spatial strategy.   There also has to be sufficient certainty that the approach put forward through policies and proposals can be implemented in a way that acts to improve sustainability, and meet any relevant vision and objectives for the area.

Stages of the SA so far

2.5   The SA of the emerging LDP is intended to be an iterative process, with feedback between successive stages of appraisal and the production of the LDP. This approach is to allow the potential sustainability implications of options considered in preparing the strategy can be made explicit. Thereby, allowing these to be taken into account in the choices made by the LDP team and helping consultees respond to the LDP.

2.6   **Scoping** – The first stage of the SA was a scoping exercise to identify the main sustainability issues in the plan area, to set out the approach to SA and the sustainability framework. This initial stage was undertaken in 2006. This stage has a reporting requirement with the production of a scoping report.

2.7   There is a statutory requirement in the SEA Directive for named environmental consultation bodies (Environment Agency, Cadw and Countryside Council for Wales) to be consulted at this scoping stage. This was the case for the SA for the LDP, however it was decided to widen this

consultation to the general public. There was also a presentation of the scoping report to the stakeholder group for the LDP in order to allow input into the process. Where relevant, comments and responses were incorporated into the SA and scoping report, with a final version produced in December 2006. The final report is available on the Bridgend County Borough Council LDP website.

2.8   **Initial SA of the Growth Options Report –** at this stage a brief sustainability statement was produced to show the relative sustainability impacts of implementing the alternative approaches to growth in Bridgend. This considered, in a broad way, the differing impacts of implementing high, medium and low levels of growth from the growth options report. The extent of this appraisal was limited given the roll forward of existing commitments. This meant existing commitments exceeded the lowest growth option and are therefore not achievable.   The appraisal table of the growth options is included as Appendix 2 to this report.

2.9   **Pre-Deposit Proposals Consultation Stage** – this is the current stage of the SA and what is reported in this note. The purpose of this stage is to give an indication of what the relative sustainability implications would be of implementing the alternative spatial strategy and growth options. As well as the sustainability impacts of the chosen approach.

2.10   This version of the SA Report is to be put out to consultation alongside the Pre-Deposit Proposals Consultation Stage. Consultation responses on the SA Report at this stage will be taken on board in moving forward with the appraisal process.

2.11   **Next stage: SA of the deposit version** – the next stage of the SA is the appraisal of the deposit stage LDP. At this stage the additional detail added through policy and firm site allocations will be subject to suitable sustainability appraisal. Initial SA of the deposit LDP will be carried out allowing sufficient time for any matters raised, to be considered by the LDP team/officers of the Council and, where appropriate, inform the published deposit Plan.

3 The sustainability objectives

3.1 The objectives proposed for use in the sustainability appraisal (SA) were developed using those from the previous SA of the UDP as a starting point. However, these have been adapted to indicate how they were relevant to the LDP for Bridgend

3.2 Part of the scoping exercise for the SA was to investigate the baseline sustainability characteristics of the County Borough. Identified from these are any sustainability issues that would need to be addressed in the area, including through implementation of the LDP. In addition to this, a review of plans and programmes that cover the County Borough was carried out at scoping. The purpose was to identify other objectives, or sustainability considerations that should be taken into account in the sustainability appraisal.

3.3 Therefore, taking into account other plans and strategies, as well as the baseline sustainability considerations identified at Scoping, enabled the sustainability objectives to be tailored to the appraisal of the LDP. The Scoping Report contains an explanation of this process, and full details of the baseline characteristics of other plans and programmes (see Scoping Report, December 2006 (BLP4) on the Bridgend County Borough Council website).

3.4 The sustainability objectives, have their basis in a general consensus on what sustainable development means. This is based on an understanding of sustainability as:

- natural resources should be efficiently used so that future generations can meet their needs

- equitable access to resources, where access to resources for some should not be denied by the actions of others, now and in the future.

3.5 To use such ideas in examining a land use or spatial plan, something more specific is needed. Therefore, a sustainability framework has been developed to establish a common and consistent definition of what it means to achieve greater sustainability in Bridgend, for SA.

3.6 This sustainability framework uses the four objectives of sustainable development from the UK Government, sustainable development strategy, '*A Better Quality of Life*' (May 1999), despite this strategy being superseded in 2005:

- social progress which recognises the needs of everyone

- effective protection of the environment

- prudent use of natural resources

- maintenance of high and stable levels of economic growth and employment.

3.7   The updated UK strategy for sustainable development is 'Securing the
        Future'. This was produced in conjunction with the UK shared strategy
        framework 'One future – different paths' (March 2005) which gives the
        purpose of sustainable development as a goal that:

        *'…will be pursued in an integrated way through a sustainable, innovative and
        productive economy that delivers high levels of employment, and a just
        society that promotes social inclusion, sustainable communities and personal
        well-being. This will be done in ways that protect and enhance the physical
        and natural environment, and use resources and energy as efficiently as
        possible'*

3.8   'Securing the Future' the new Sustainable Development Strategy sets out five
        guiding principles that will replace the four aims or the older strategy. The
        strategy defines sustainable development as:

        •   living within environmental limits

        •   ensuring a strong and healthy and just society

        •   achieving a sustainable economy

        •   promoting good governance

        •   using sound science responsibly.

3.9   However, the headings used in the 1999 UK Strategy are used in this
        appraisal as they are a more useful way of organising the Sustainability
        Framework.

3.10   The sustainability framework tries to identify those matters of environmental,
        economic and social capital that are basic to well being and which we want as
        much of, or more of, in the future. The sustainability framework identifies
        these basic elements together with what constitutes a better position for each
        element. It tries to be comprehensive whilst keeping the different items in the
        framework distinctive.

3.11   Ideally quantified indicators and targets would be included. However,
        quantifying each of these objectives, and developing relevant indicators is a
        difficult process as the very nature of the majority of the content of a
        development plan would not enable change to be directly attributed to the
        influence of the plan or to be measured. Therefore, the SA is principally
        concerned with whether the direction of change that the Plan would be likely
        to bring, would be positive in achieving more sustainable development, rather
        than with attempting to quantify changes.

3.12   The objectives can be further developed to include indicators for monitoring,
        through combination with the proposed monitoring framework for the LDP.
        Therefore, indicators will be added to the framework as the LDP moves
        towards the final adoption version. More information on monitoring is
        included in section 10 of this report.

3.13   The objectives presented in Table 3.1 take the form of a 'headline'
       sustainability for which an objective has been developed. This is followed by
       the objective itself, which sets out what the Plan should be trying to achieve in
       relation to sustainable development. These are each accompanied by a set
       of supporting objectives, these are examples of the ways the LDP may
       directly impact on the objectives, representing a move towards greater
       sustainability.

3.14   The objectives have a purpose of providing a systematic basis for the stages
       of sustainability appraisal. By comparing the proposed objectives, strategy,
       policy and allocations against this consistent definition it is possible to
       determine if the plan is likely to be making a contribution to greater
       sustainable development.

Table 3.1: The sustainability objectives for Bridgend LDP

Concern	Objective	Supporting objectives
Social progress which recognises the needs of everyone		
Accessibility	**To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough.**	• Promote sustainable transport infrastructure, and integrated transport approaches • Implement an access hierarchy, putting pedestrians at the top and car users are the bottom • Promote alternative modes of transport where feasible. • Ensure all have access to essential facilities and services, by a variety of modes of transport • Reduce reliance on the car for transport • Reduce existing disparities to access to services, decent homes and jobs
Housing	**To provide the opportunity for people to meet their housing needs**	• Meet the housing requirements of the area in ways which help build sustainable communities • Provide affordable housing to meet identified needs • Help provide good quality housing throughout the County Borough
Health, safety and security	**To improve overall levels of health and safety, including the sense of security, for all in the County Borough**	• Improve access for all to good quality health services for planned and emergency healthcare, leisure and social facilities • Enhance opportunities for healthy living and empower people to take responsibility for their own health – including improving access to open space • Encourage people to reduce car use, and travel by walking and cycling • Encourage new development to be designed for security and safety principles
Community	**To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend**	• Strengthen community spirit and wellbeing • Challenge anti-social behaviour by creating an environment where it is difficult for such behaviour to flourish • Ensure new development and regeneration provides for the communities which it will serve, taking into account considerations such as appropriate design layout and sense of place
Effective protection of the environment		

Biodiversity	**To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value**	• Conserve the local biodiversity as a result of land management and flood management • Conserve areas designated for national and international biodiversity significance • Protect and enhance habitats wherever possible, and help contribute towards biodiversity • Ensure new development avoids the further fragmentation of habitats, and the destruction of movement routes for flora and fauna • Help implement the Local Biodiversity Action Plan actions and/or targets
Landscape	**To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements**	• Protect and enhance the County Borough's urban, rural and coastal landscapes and to maintain and increase access to open space • To instil in local communities, a pride in their surroundings • Will it help to protect areas identified for their historic landscape importance • To bring the natural environment under positive management, including natural habitats, the historic built and natural environment and land environment meeting national quality standards.
Built Environment	**To maintain and enhance the quality of the built environment, including the cultural/historic heritage**	• Protect and enhance sites, features and areas of historical, archaeological, architectural and cultural value and their setting, including features of local cultural significance • Encourage and support specific improvement projects • Maintain and enhance the built quality of settlements • Ensure that the County Borough remains a region of diverse and distinctive heritage and landscape • Ensure the most appropriate design advice and guidance is made available in connection with proposals for development to enhance built environment quality
Prudent use of natural resources		
Air	**To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere**	• Reduce the need for dependence on the private car through influencing people's travel choices, including making alternative, more sustainable modes of transport like walking and cycling, much easier, more attractive and a viable alternative • Ensure all new development takes into account the need to maintain and improve residential amenity
Climate change	**To ensure that new development takes into account the effects of climate change**	• Avoid development from being located in areas at substantive risk from fluvial flooding, including incorporating sustainable drainage systems in new development where appropriate • Take into consideration the risks of storm surges and sea defences being overtopped when planning new development in areas of risk from tidal flooding • Ensure development it constructed with high energy efficiency standards to reduce energy consumption • Ensure development is constructed to be able to adapt to the potential change in weather patterns as a result of climate change, in particular hotter summers
Water	**To maintain and improve the quality and quantity of ground**	• New development should be constructed so as to ensure that water is used efficiently • Improve and maintain coastal bathing waters at Rest Bay

	waters, river waters and coastal and bathing waters	and Porthcawl, and transitional waters at Ogmore-by-Sea • Protect water bodies from pollution, for example by ensuring there is sufficient suitable waste water treatment infrastructure
Land / Soil	**To use land efficiently, retaining undeveloped land and bringing damaged land back into use**	• Promote the conservation and efficient use of land, including building at higher densities and reusing previously developed and derelict land in preference to greenfield sites • Protect soil of higher agricultural grades from development • Ensure that appropriate remediation of contaminated sites is undertaken prior to development
Minerals and waste	**To maintain the stock of minerals and non renewable primary resources**	• Ensure mineral resources are used efficiently and with the least environmental damage • Ensure the recycling and reuse of building materials wherever possible, such as for aggregate, in preference to primary mineral resources • Reduce use of primary resources through providing appropriate sites for sustainable waste management, including re-processing, recycling and sorting
Renewable energy	**To increase the opportunities for energy generation from renewable energy sources**	• Promote the generation of energy from renewable sources • Ensure that, where appropriate, new developments generate a proportion of their energy from renewable sources on site
Maintenance of high and stable levels of economic growth and employment		
Employment	**To ensure that there is a vibrant local economy which is at the forefront of a wider regional economy and provide diversity of employment within the County Borough and support a culture of entrepreneurship**	• Maintain a motivated, highly skilled and well educated workforce • Improve access to employment for all residents of County Borough, and help reduce disparities • Provide an infrastructure of transport, communications and land development, which attracts and retains local businesses. • Ensure Bridgend continues to be a 'working district'', providing diverse job opportunities for local people
Wealth creation	**To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity**	• Achieve economic benefits resulting from tourism • Ensure necessary infrastructure to support a sustainable economy • Maintain a coherent and successful range of business support that is widely available and assists the competitiveness of local companies and local supply chains

4 The purpose of sustainability appraisal

4.1 The purpose of this SA is to help inform the LDP during its development to help it in setting strategy, and policies that will help in the delivery of more sustainable development. As part of this it is important to look at how the strategy has been developed, and the policies worded, to see if they would be effective in actually securing the implementation of development to meet sustainable development objectives.

4.2 Therefore, in addition to appraisal of the content of the Pre-Deposit LDP Proposals this appraisal also considers how usable the policies will be in delivering the right kind of development. This will include consideration of matters such as, whether they are based on appropriate evidence, the detail presented in policy, and how effective the policy could be in making decisions on planning applications.

4.3 The role of the SA in informing the emerging LDP is also an essential one. The SA of the Bridgend LDP began with the scoping report, to pick out key sustainability issues in the County Borough, then proceeded to look at the implications of alternative growth options, and now is looking at the spatial strategy, and its alternatives, to identify likely sustainability impacts and make recommendations for changes that could help improve sustainability performance.

4.4 In the following sections, the SA gives consideration to each of the principal components of the Pre-Deposit Proposals, the vision and objectives, the options for growth, and the strategy and strategic policies.

5   Sustainability appraisal of the Vision and Objectives

5.1   A previous set of LDP objectives was assessed as part of the sustainability appraisal (SA) of the growth options document. However, these have changed considerably since that time and therefore are subject to a full re-appraisal in the SA Report.

5.2   The appraisal of the objectives are included as appendix 1. This SA of objectives compares the LDP objectives to the sustainability objectives developed for the SA process, as shown in section 3 of this report.

5.3   The comparison reveals that the LDP objectives are quite comprehensive in their coverage of sustainability issues. All the sustainability objectives are addressed through LDP objectives. The objectives do place an emphasis on matters related to building communities and promoting equitable access, over other issues such as environmental protection. However, the emphasis may be suitable in this area, given the need to address issues of equity, and achieve benefits for the wider community of the County Borough. Many parts of the County Borough are in need of regeneration and renewal, experiencing issues related to access, employment services and general wellbeing.

5.4   The review of the LDP objectives, that included comparison with sustainability objectives and the issues from chapter 5 of the LDP, reveals that there may be some other issues suitable to address through the LDP objectives. These are:

- identifying more specific objectives for waste management, beyond that in OBJ2d, such as the specific need for sites to be identified for new facilities through the LDP

- the need to address minerals development, including safeguarding minerals sites from other types of development

- the need to deliver more resource efficient development, including lower carbon buildings and water efficiency

- separate objectives addressing the natural environment and the built environment. These should include historic heritage and the need to enhance the quality of the existing built environment where necessary.

5.5   The vision sets out the what the aim is for the County Borough by the end of the plan period in 2021. The image it sets out for the future is of a sustainable place with a well-performing economy, which supports a network of communities. The vision includes spatially specific elements to demonstrate how the different towns will be performing, relevant to their strategic role and regeneration needs. If successfully implemented, the vision could have great benefits for the sustainable future of Bridgend County Borough.

6 Sustainability appraisal of the growth options

6.1 The authority's work on the strategy for the LDP included determining the levels of development growth for the County Borough, primarily for housing and employment.

6.2 This section of the SA considers the alternative options for growth. It seeks to identify the main implications for delivering sustainable development of the chosen approach and its alternatives.

Housing growth

6.3 The Council developed housing growth options in summer 2007 and these were subject to a separate sustainability appraisal at that time. The findings of this appraisal have been incorporated into the Pre-Deposit Proposals. Appendix 2 sets out the appraisal of low, medium and high growth options. The full growth options SA can be found on the Bridgend website, giving further details of the approach as well as appraisal findings.

Summary of growth options SA

6.4 Broad assumptions have to be made when identifying the potential sustainability impacts of growth options, as many of the actual effects will also depend on the spatial distribution, regardless of the option chosen. This can give very different potential sustainability outcomes.

6.5 Housing growth levels need to be based on realistic assumptions about economic growth. If housing supply is too high and outstrips job growth, this could lead to creating, and reinforcing, the roles of some towns and villages in the plan area as commuter settlements. This would have adverse impacts, including increasing travel for work, with impacts of environmental sustainability. There would also be adverse social sustainability impacts, as these settlements are likely to have a lack of identifiable community character and cohesion. These may also be unable to support the necessary services and viable village centres to create vital communities.

6.6 Housing levels matched to job growth should aim to reduce the gross level of commuting in and out of Bridgend County Borough for work, improving accessibility performance and reducing travel need and distances.

6.7 Housing must be provided at a sufficient level to deliver affordable housing needs in the County Borough. Higher levels of housing in total is likely to mean higher levels of affordable housing as well.

6.8 A higher growth level would require more development land. The extent to which this could be accommodated on previously developed land would depend on how this development was distributed around the plan area. Where greenfield land is required, there is the potential for adverse impacts on sustainability, in relation to biodiversity, landscape, soil and safeguarding minerals. However, the extent of these impacts will depend on the character of individual sites, both greenfield and previously developed. Although, higher growth levels will mean more land is needed for development, the exact extent of these impacts is difficult to determine.

6.9 Phasing of land release may be necessary to ensure that previously developed sites are developed in preference to greenfield sites under medium

to higher growth options. Phasing could also be used to deliver development
in locations where it can make a specific contribution to sustainable
development, including helping to create sustainable communities.

6.10 Higher levels of housing growth are more likely to be able to secure higher
levels of financial, and other, contributions. This will help to deliver essential
services and infrastructure to the communities of the County Borough,
including schools, high quality open space, transport infrastructure, and
affordable housing. Securing these will also depend on the locations and size
of new housing developments.

6.11 The chosen growth level for housing was at the 'medium' level that would
provide around 8100 homes over the fifteen year period from 2006-2021.
This is approximately 540 dwellings per annum (dpa), around 78 dpa more
than would be provided under a 'do-nothing' scenario where no new
allocations were made.

6.12 This chosen amount fits well with the existing trend in housing growth and
therefore is realistic in terms of achievability. It is higher than the suggested
figure from the South East Wales Strategic Planning Group (SEWSPG). The
higher figure may reflect:

- the needs of the County Borough to identify a level of growth in keeping
  with economic growth predictions

- the need to put in place a growth figure that also responds to the
  regeneration needs of some of the communities of the County Borough,
  and

- the need to deliver new housing stock in these areas.

6.13 The actual sustainability implications of this growth level will depend on how
this level of growth is distributed around the plan area. For example, it could
be whether this will be on previously developed land, if development will be
focused on areas in need of regeneration, or if development will be delivered
based purely on market demand. Sustainability implications may also vary if
development does not come forward exactly in line with the strategy, or where
market pressure or lack of demand sees housing developed at different levels
than intended.

Employment growth

6.14 Three employment growth options are put forward for consideration in the
Pre-Deposit Proposals. These are based on how much land should be
allocated for employment uses in the plan. Two of the options relate to the
need to maintain 'committed' land, review some of the employment land
allocated in the existing Unitary Development Plan, and allocate additional
land in new areas. The third would see all existing allocated employment
land rolled forward from the Unitary Development Plan and no further
allocations. The SA of the three options has been carried out for the first time
with the appraisal of the full Pre-Deposit Strategy. The appraisal tables are in
Appendix 3.

6.15 The practical difference between the low and medium options may actually
not be that great. As under both these options there is the possibility that the

final quantity of land allocated for housing is the same, if the review reveals this to be suitable.

6.16 Re-assessing all non-committed employment sites allows for greater flexibility in identifying and implementing a more sustainable spatial strategy. For example, re-assessment can allow a strategy to be developed that brings forward housing and employment in proximity to one another with the aim of reducing travel demand and distance. Reviewing sites prior to setting the strategy can also lead to the re-allocation of sites to meet specific identified need. For example an employment site may become a mixed use development site delivering regeneration initiatives to a settlement, or a housing site that is well located for public transport.

6.17 In order to deliver a more sustainable spatial strategy, development should be located to reduce the need to travel. Therefore, it would be preferable to limit the quantity of land allocated for employment, or phase release of land. This is important to drive the implementation of a chosen spatial strategy.

6.18 Over-allocation of land may lead to:

- employment sites being developed outside the desired spatial strategy

- employment land being delivered out of step with other land uses, such as a mismatch of housing and employment

- land being retained for an employment allocation that could be better used to serve an alternative purpose, such as housing, community use or mixed uses.

6.19 There are some economic sustainability benefits in allowing some flexibility in the choice of land. This may help encourage investment in the area and provide a range of sites to provide for a variety of needs for new and expanding businesses. However, to achieve sustainable regeneration benefits for the County Borough it will be important to attract businesses that fit well with the resident workforce and not those that will rely on people commuting into the area for work.

6.20 As with housing growth, the medium option has been chosen as the preferred approach for employment growth. This would appear reasonable. However, the implications may depend on:

- the total area that is allocated for employment use following review

- the distribution of these allocations, and

- the final take-up of employment land.

6.21 Part of the chosen preferred approach includes the need to re-assess a proportion of current employment sites. Knowing which sites are no longer needed for employment, either to be re-allocated or de-allocated, could help in the preparation of a sustainable spatial strategy. This would allow the distribution of development, and the allocation of strategic sites, to be informed by a full understanding of land availability. Knowing the location of employment land would be useful in developing a spatial strategy where new housing allocations could respond to the likely location of new employment, to create sustainable settlement patterns. This is not the case with the Pre-

Deposit Proposals, as work remains to be completed on the re-allocation of sites.

7 Sustainability appraisal of the spatial strategy options

7.1 This section of the SA considers the spatial distribution options for development. Distribution of development is the principal way in which sustainable development can be delivered. A spatial strategy can help deliver more sustainable development in a number of ways. These include:

- Locating development to help reduce the need to travel by car, by locating homes near jobs and creating areas of mixed use development

- Locating new development well served by public transport

- Supporting mixed use and high density development in those areas that have good accessibility by a variety of transport modes

- Directing development away from areas of sensitive natural environment

- Allocating land for development in areas in need of regeneration

- Supporting the continued viability of town centres by focusing new development in these areas

- Allocating land for other land uses that can help deliver sustainable development, for example locations for the sustainable management of waste

- Locating development where it may be possible to make use of renewable energy sources

- Allocating sites for waste treatment, including re-use and recycling, in areas near waste sources.

7.2 The spatial strategy alternatives which the LDP defines look at development in a generic way. This is intended to cover all types of development such as housing, employment and retail. Three alternative spatial strategies are put forward in the Pre-Deposit Proposals, each seeking to distribute development according to specific principles. These are:

- Economic led

- Regeneration led

- Population and settlement led.

7.3 The plan preparation team appraised each option against the LDP objectives. This was in order to determine which option is most likely to help deliver development compatible with the LDP objectives. The four headline objectives for the LDP are:

- to produce high quality sustainable places where people want to live

- to protect and enhance the environment

- to spread prosperity through regeneration

- to create safe, healthy and inclusive communities.

7.4   The Council undertook the assessment, rather than the consultants responsible for the rest of the SA. This was comparable to a sustainability assessment. It helped in the iteration of the alternatives and the selection of the final approach as is required in good practice on plan making and SEA. However, it is necessary to look again at these alternative spatial strategies to assess what they may mean for delivering sustainable development. This involves a sustainability appraisal against the SA objectives, in section 3 of this report.

7.5   This presents a difficulty for the appraisal of options as the way strategies are implemented will vary. Therefore, in undertaking the assessment it is necessary to make a number of assumptions. These are:

- alternative strategies will be fully implemented through policy

- policies will be in place to mitigate against adverse impacts on the natural environment

- development will be brought forward with a focus on previously developed land in preference to greenfield land

- development referred to in the strategy refers to all types of development, including housing, employment and retail

- strategies refer to the distribution of development that is not already accounted for through housing and employment land commitments (it is assumed that allocations not yet committed can be reviewed, especially employment land).

7.6   Appendix 4 shows the full appraisal of the strategic spatial options. This appraisal is based on a commentary of possible implications for implementing the strategy. It is not possible to draw any firm conclusions on sustainability because of impacts the potentially different ways polices could be implemented. Impacts will also depend on other factors that are not yet defined for these alternative strategies. These factors include, lack of information about the quantity of development, such as numbers of new homes (in addition to current commitment), and employment land areas.

7.7   For the regeneration-led option there are no details on the proportional split of development, as there are for the other two choices. Relative sustainability impacts are therefore difficult to determine with any degree of certainty. This lack of detail also means that it is not apparent what the level of development will be under this option. It may be difficult for respondents to the Pre-Deposit LDP to understand what this option may mean to them.

7.8   In summary, the sustainability appraisal recognises several main differences between the sustainability impacts of the alternative strategies. These are:

- ***Accessibility and air quality:*** One of the elements of a sustainable spatial strategy is helping reduce car reliance. This can involve reducing the distance people need to travel to get to work and meet their other day-to-day needs. The employment-led strategy would match the location of existing employment with housing to reduce the journey length for new residents to work. This is to help reduce car use. It would also focus development in Bridgend so that this option would increase accessibility to other facilities, such as shops and community services.

  However, the employment option, and to some extent the population option, would see less development in the more isolated valley communities where there is currently less employment available. This would reduce accessibility to these services for new and existing residents in these areas.

  The regeneration led strategy would help support services in the valley communities and therefore improve accessibility for new and future residents.

  Accessibility is also linked to air quality. Where the need to travel by car is reduced, this can have benefits for local and global air quality. The strategy options for more development in the M4 corridor area, for instance in the Valley Gateway and Bridgend, may have adverse impacts on local air quality if sufficient measures are not put in place to achieve a modal shift away from car use.

- ***Meeting housing needs:*** Under the employment led strategy, some communities, including Porthcawl, would receive very little, or no new, development. Therefore, this approach would constrain the availability of housing in these areas, pushing prices up and reducing affordability. Low levels of new housing provision in the valley areas of Ogmore and Garw also mean that new quality housing would not be provided to meet the needs of residents in these communities. This may lead to decline as young people move away.

- ***Using previously developed land in preference to greenfield land, landscape soil and biodiversity impacts:*** It is likely that all options would require some additional greenfield land to meet housing needs. The employment-led option would require a large amount of new development to be focused in Bridgend, meaning that some additional greenfield land would be required to meet needs. For the regeneration option, some greenfield extensions would be required in the valley villages that are currently constrained because of the valley location. In the population-led strategy, additional land will be needed in Pencoed as there is little previously developed land left for development in this area.

  The landscape, soil, safeguarded mineral resource and biodiversity impacts of each of these options will depend on the location of any proposed development site. Where more land is required there is more likely to be a greater impact.

There are several internationally designated nature conservation areas in the County Borough and, depending on the exact location, there is the potential for impact from development on these sites. This includes:

- development near Blackmill Woodland in north Bridgend, Ogmore Valley and north east Valley Gateway

- to the east of Porthcawl near Merthyr Mawr Warren

- near Cefn Cribbwr Grasslands in the western part of the Pyle/Kenfig/Cornelly area.

However, impacts cannot be predicted with any certainty due to lack of information on quantity and potential locations of development.

- ***Strengthening communities and providing local services and facilities:*** The employment led option would see little new development going to some of the towns and villages identified as being in need of regeneration. This is likely to cause adverse impacts on these communities including social inequity across the County Borough. Development needs to be directed to these more isolated communities to support the existing population. It may create new employment and provide a greater range of local services and facilities. To achieve these aims LDP-guided development will need to be delivered alongside other strategies. This is the intent of the regeneration-led approach.

  The strategy option based on population would have the undesirable sustainability impact of reinforcing the roles of some settlements as 'dormitory' areas with little cohesive character of their own. Examples of this include continued high levels of development in the Pencoed sub-area which has little indigenous employment.

- ***Employment and wealth creation:*** Existing employment sites are not evenly spread throughout the County Borough and there is a disparity in existing access to employment. The market favours areas with good connections to the national road network and sites that are relatively easy to develop. Therefore, some parts of the County Borough have poor access to employment and little inward investment, such as in the Ogmore and Garw Valleys. The employment strategy option would see this status quo retained. The other strategy options, particularly the regeneration led strategy, would aim to address this better by directing more development towards the valley areas. This strategy option would also direct more development to Porthcawl which can also support a range of employment opportunities.

7.9 The selected approach is the regeneration strategy. As shown in the sustainability comparison tables this option does perform quite well in helping to achieve sustainable development.

8   Sustainability appraisal of the strategy

8.1   Section 9 of the Pre-Deposit Proposals brings together the chosen elements of the strategy, including the chosen growth options and spatial strategy. The preferred approach is a regeneration-led spatial strategy, with trend-based housing growth and medium employment growth.

8.2   The first part of section 9 of the Pre-Deposit Proposals sets out the proposed strategy. This includes detail of the development and regeneration opportunities in each of the main settlements. It also provides justification for the strategic policies, such as the economy and housing growth (including information on commitments). The second part of section 9 includes the 15 spatial policies that will be used to implement the strategy. These will serve as the framework for development consents to deliver the strategy.

8.3   The strategy's written text, shows a good understanding of the needs of the County Borough and what is needed from a strategy to help meet regeneration objectives and deliver sustainable development.

Regeneration Growth Area Projects

8.4   For each of the 'regeneration growth areas', the strategy sets out a schedule of projects and developments that could be implemented to help deliver sustainable communities. These projects are at various stages of planning, some are only allocated land, while others are ongoing projects. In some instances, the LDP will be the primary mode of delivery. In others, it will be in combination with other plans and strategies.

8.5   Successful implementation of these schemes could help meet sustainable development objectives for the County Borough and the identified regeneration areas.

8.6   ***Porthcawl***: Development in this town would deliver new housing and mixed use development necessary for regeneration, and supporting the tourism economy of the area. Proposed development sites in the town are centrally located. This helps to improve access by car, bike and public transport, with associated positive sustainability benefits. Sustainability risks of development include the loss of some open land for development, the need to address tidal flooding risk, and the proximity to the internationally protected nature conservation sites at Kenfig and Merthyr Mawr. Development will need to be delivered in line with management plans for these nature conservation sites to avoid impacts of possible increased visitor numbers.

8.7   ***Maesteg and the Llynfi Valley***: Maesteg has been identified as one of the areas in need of a policy led approach to ensure development is delivered to overcome past under investment in the area. The schemes proposed for this area, if successfully delivered, could have significant regeneration benefits. These include a large new school, town centre renewal, and improved public transport to link the area to the wider County Borough. Development could also bring long vacant land back into use. This would be subject to suitable controls on development to protect any biodiversity or landscape character interest. There are no major proposals for employment in this location,

although there is a need for new jobs. There may be a risk of missed
sustainable economic development opportunities for the area

8.8   *The Valley Gateway*: The role of this area is to provide development that
can be delivered through the market but also meet the need of communities
in the Ogmore and Garw Valleys, where the market is less strong.
Regeneration here, in combination with improved public transport, could help
to deliver sustainable redevelopment to a wide area. It will be important that
development here supports the growth of sustainable communities, by
meeting local needs locally, including the provision of local services, jobs and
homes, and creating cohesive communities with a unique sense of place.
The number of homes delivered should match employment delivery.
Development of former school sites could be essential in delivering a
sustainable community. Their former community use should not be lost
through inappropriate redevelopment. Public transport improvements,
including links to the Valleys and Bridgend, will also be essential in order that
development in this location does not cause an increase in car travel.

8.9   *Bridgend*: As the main town of the County Borough, Bridgend is set to retain
its role as the service centre and focus for development. This proposed
continued role for Bridgend is supported in aiming to deliver sustainable
development. However, new development should be of a high quality design
to enhance the built environment. Large new development sites, such as
Parc Derwen, should be planned to create new sustainable communities, with
good local services, high quality urban design and built to sustainable
construction standards. Several of the proposed development sites are in
peripheral locations around the town. Therefore, to avoid increased car use,
development of these sites will need to be delivered alongside a modal shift
away from car use. This could be through providing high quality public
transport and cycle routes, and designing development to prioritise non-car
travel, including providing local services. There are also risks to
environmental sustainability from the greenfield land take that will be needed
to deliver development.

Strategic employment sites

8.10   Four strategic employment sites have been identified for the County Borough.
These range from a 32 hectare site in Brocastle, Bridgend to 6 hectares in
North Cornelly. All of these development sites will need greenfield land take.
Therefore their development may have impact on biodiversity, landscape and
land/soil. However, the sites will help to deliver sustainability objectives
relating to the economy.

8.11   These four employment sites are all located in the M4 corridor of the County
Borough. Therefore, their development may help deliver employment for
residents in these areas, however they may not meet the employment needs
of residents in the wider County Borough who have poor access to these
locations. The type of development in these locations may also cause an
increase in car travel and trips, as well as increased HGV trips. This could
potentially have the potential to have an adverse impact on air quality, with
possible climate change and health effects.

Housing and employment allocations

8.12   Some of the biggest influences on creating a sustainable development
        strategy for the County Borough, are beyond the control of the LDP. This is
        because of the level of housing and employment land already committed for
        development.

8.13   Around 71% of the housing land is committed before preparation of the LDP
        started. This includes firm allocations and sites that have planning
        permission. A further 18% of housing will be from windfall development, and
        therefore will not be allocated by the LDP. Therefore, potentially this is not
        linked to the spatial strategy. This leaves only around 11% of the entire
        housing provision to be allocated through the LDP, and to be used to help
        deliver the housing element of the spatial strategy identified for the LDP.

8.14   To understand the strategy, it would be useful for the Pre-Deposit Proposals
        to set out existing commitments in detail in a table. This would show their
        distribution and the quantity of development that they are expected to provide.
        The purpose of the table would be to make it easier to see how these
        committed sites would help, or possibly hinder, delivering the spatial
        distribution needed for the 'regeneration' strategy. It would then be possible
        to see how the distribution of the residual amount of housing development
        could help contribute to delivering the 'regeneration' strategy.

8.15   The review of employment allocations should have been undertaken before
        setting the strategy and deciding on strategic sites. Knowing which sites are
        no longer needed for employment, either to be re-allocated or de-allocated,
        could help in the preparation of a sustainable spatial strategy. This would
        allow the distribution of development, and the allocation of strategic sites, to
        be informed by a full understanding of land availability. Knowing the location
        of employment land would be useful in developing a spatial strategy where
        new housing allocations could respond to the likely location of new
        employment, to create sustainable settlement patterns. It should also allow
        for sites that are not compatible with sustainable development objectives to
        be removed.

8.16   The choice of strategic employment and housing sites also has an important
        influence on achieving sustainability development. These are the sites that
        will help deliver the strategy. The Pre-Deposit Proposals do not make clear
        how the these strategic sites were selected from possible alternatives. The
        LDP should include the evidence used for selecting the strategic employment
        and housing sites. It should explain how they fit with the regeneration
        strategy and LDP objectives. This would provide essential justification for the
        sites. It would help consultees understand the strategic role of these sites in
        delivering the LDP vision.

Sustainability appraisal of the strategic policies

8.17   In this section of the SA Report, the sustainability implications of the strategic
        policies are considered for their likely impact on delivering more sustainable
        development. Appendix 5 contains detailed appraisal matrices of each of the
        policies of the Pre-Deposit Proposals. These matrices show how the policy
        performs against the sustainability objectives. Each contains overall
        conclusions on the policy's contribution to sustainable development. They

also set out recommendations for policy changes or implementation approaches to improve the sustainability performance of the policy.

8.18   Strategic policies have a vital role to play in implementing the strategy for the LDP. They should provide the detail necessary to implement the chosen 'regeneration' strategy and the specified levels of growth. They have an essential role in providing the framework for making all decisions on the delivery of new development, including homes, jobs and shops, as well as guiding new waste and minerals development. The policies on detailed matters to guide the exact form of development will be included in the deposit LDP.

8.19   There is a need for the strategic policies need to be worded in such a way as to set out how the strategy will be implemented. LDP Manual Wales, states that Pre-Deposit Proposals should include: '*relevant policy which would implement the preferred strategy'* (page 71). These strategic policies should therefore be an essential starting point in determining the suitability of any planning application.

8.20   In some instances, the strategic policies of the Pre-Deposit Proposals do not contain sufficient detail to perform this role. The main text of the strategy, as it is set out in section 9, contains an integrated and proactive strategy for delivering development, including details of the location and quantities of development expected. However, in the15 policies details and specifics of the strategy purpose are lost. This raises the risk that the policies will not be sufficient to deliver the strategy.

8.21   In terms of achieving sustainable development, it may therefore be necessary to add detail to policies to show more comprehensively how they will deliver development. This could include more specific information, such as: spatial information on the location of community hubs, mixed use development and education schemes, even if these would not directly, or solely, be delivered through the LDP. Also, more quantified information such as the quantity of employment development and the distribution of housing.

8.22   Also absent from the policies, is how development will be controlled to deliver non-allocated development and windfall housing. It will be important to have policies in place to control the large amount of development that comes forward as windfall, as it helps to deliver the strategy.

8.23   Matters that could be more fully explored as policy are the role of the rural areas, and how the rural/urban split of development will be addressed. For example, this could be through defining settlement boundaries. Table 9.1 of the Pre-Deposit Proposals does set out information on these matters in some detail. However to be implemented, this will need to be addressed in policy.

8.24   Strategic policies should also address all those matters that will apply to all development in the County Borough.   Additional information could be beneficial. For example, policy could set target standards for delivering sustainable developments, such as meeting the Code for Sustainable Homes or BREEAM. Policy could also address issues of affordable housing, and setting targets for delivery where there is a need. Strategic policy could also set targets from on-site (or near-site) renewable energy generation for larger development sites.

8.25   To achieve the best outputs, including delivering more sustainable
development, policies need to be tightly worded and pro-active in how they
will deliver development. For example, it may be more effective to use policy
wording such as '*development will not be permitted…*', '*only development that
meets the criteria will be permitted…*', rather that more indefinite wording
such as *'in favour of…'*. Policies should be clearly, and unambiguously,
worded.

8.26   The matrices in Appendix 5 include a full appraisal of each policy against the
objectives for sustainable development.   Paragraphs 8.28 to 8.57 address
each objective in turn summarising where the main impacts may arise, both
positive and potentially negative. To get a full understanding of this appraisal
it is necessary to look at the full matrices. However, this section repeats
some of the main findings, and general comments.

8.27   Overall, the policies are quite comprehensive in their coverage of
sustainability issues. There are unlikely to be any major adverse impacts of
policies on sustainable development. Besides the issues addressed in the
earlier paragraphs of this section, additional policy could be included covering
protection of the landscape character and the delivery of large mixed use
developments.

To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough

8.28   Potential positive impacts:

- Policies directly related to meeting this objective of improved
accessibility to jobs, homes and community services, include those on
transport proposals (SP3), focused retail and commercial development
in town and villages centres (SP11), and the creation of new 'community
hubs' providing a range of community services in one location (SP14)

- Policy SP1 promotes new development in areas in need of regeneration
which should help improve accessibility in these locations.

8.29   Potential adverse impacts:

- The location of strategic employment sites in policy SP10. These sites
are all in the southern part of the County Borough, and in peripheral
locations on the edge of towns.

To provide the opportunity for people to meet their housing needs

8.30   Potential positive impacts:

- The strategy proposes delivering 8100 new homes in the County
Borough over the plan period (SP13). These will be distributed
throughout the plan area, although the greatest focus will be on
Bridgend, it will help provide homes for all.

8.31   Potential adverse impacts:

- The policies make no reference to the delivery of affordable homes.
This could be addressed through targets for the delivery of affordable
housing in strategic policy.

To improve overall levels of health and safety, including the sense of security, for all in the County Borough

8.32   Potential positive impacts:

- Policies on directing development to areas in need of regeneration (SP1), setting out development principles to reduce pollution (SP2), and including a policy on tourism related to outdoor recreation (SP12), should all help meet this objective.

- There may also be direct benefits to safety from road and junction improvements (SP3).

8.33   Potential adverse impacts:

- There are also potential risks to health from policy and strategy. The large amount of new development is likely to give rise to new car trips. This could have impacts on air quality and associated health impacts. This may be exacerbated by new employment development in the M4 corridor, leading to more distribution-related employment. The movement of goods by HGV can have significant negative impact on local air quality with associated impacts on health (SP10).

- Some communities may suffer from being located near development that may have an impact on local amenity. This includes large industrial or distribution related employment sites, and potential mineral workings. There may be impacts on the health and wellbeing of these communities.

To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend

8.34   Potential positive impacts:

- The regeneration initiatives proposed through the strategy should have positive impacts on communities (SP1). Where there is a focus on town or village centre renewal, this may also help community identity and distinctiveness (SP11).

- Policies on protecting the historic and built environment can also help retain features of importance to local communities that aid their distinctiveness (SP5)

- Policies relating to community facilities and the creation of 'community hubs' should have a positive impact in meeting this objective.

8.35   Potential adverse impacts:

- Some communities may be at risk from the negative impacts of being surrounded by a large amount of industrial or mining development (SP10 and SP7).

To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value

8.36   Potential positive impacts:

- Policies with a direct positive relationship with this objective include SP4 and SP2 that include provision for biodiversity protection and enhancement.

8.37   Potential adverse impacts:

- Development puts the biodiversity assets of the County Borough at risk. This includes development of greenfield land for employment and housing. However, development on previously developed land may also harm the biodiversity resource, especially where land has been vacant a long time and habitats have begun to re-establish.

- Minerals development may put biodiversity at risk, on land and potentially also through marine dredging.

To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements

8.38   Potential positive impacts:

- Policy SP4 has a direct positive relationship with this objective

8.39   Potential adverse impacts:

- New development on the periphery of development areas will have to be of a high quality design to protect the landscape quality. This is particularly the case near the nationally protected Heritage Coast and in local special landscape areas

To maintain and enhance the quality of the built environment, including the cultural/historic heritage

8.40   Potential positive impacts:

- Policy SP2 includes the need to create high quality new development, including through design.

- Policy SP5 relates to the protection of the historic environment.

8.41   Potential adverse impacts:

- The large amount of development proposed in the County Borough will need to be carefully planned to ensure that the built environment is enhanced wherever possible

To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere

8.42   Potential positive impacts:

- Policy SP2 aims sets out the objective of mitigating or minimising air pollution.

- Policy SP8 on delivering renewable energy could help meet this objective

8.43   Potential adverse impacts:

- There is the risk that new employment and waste management development will cause adverse impacts on air quality, although this is likely to be mitigated by relevant controls and licences.

- Increasing car and HGV movements in the County Borough may bring greater risks of adverse air quality. Several large employment sites are allocated near the M4, Development of new distribution facilities here risks deterioration of air quality and the possible need to implement Air Quality Management Areas.

To ensure that new development takes into account the effects of climate change

8.44   Potential positive impacts:

- Policy SP2 includes the need to avoid flood risk

- Policy SP15 refers to the need for infrastructure to be provided as part of legal agreements to help manage the impacts of climate change

8.45   Potential adverse impacts:

- Some strategic allocations may be in the areas at risk of tidal or fluvial flooding

To maintain and improve the quality and quantity of ground waters, river waters and coastal and bathing waters

8.46   Potential positive impacts:

- Policy SP2 includes the need to minimise and mitigate water pollution.

8.47   Potential adverse impacts:

- The level of development proposed through the LDP has a potential impact on the availability of water in the County Borough. Waste water may also have an adverse impact on water quality.

- Sufficient waste water treatment infrastructure will have to be in place to avoid adverse impacts of new development. This could be included in policy SP15.

To use land efficiently, retaining undeveloped land and bringing damaged land back into use

8.48   Potential positive impacts:

- Policy SP2 includes the need to use land efficiently, including through the delivery of mixed use development.

8.49   Potential adverse impacts:

- The development proposed through the LDP, including SP10 and SP13 will result in the inevitable use of land, including greenfield sites

- Large allocations of employment land, that are surplus to current take-up rates, could see land used inefficiently, or sites developed that are not necessarily contributing to sustainable development.

To maintain the stock of minerals and non renewable primary resources

8.50 Potential positive impacts:

- Policies SP6 and SP7 relate to the need to protect mineral resources by avoiding sterilisation through inappropriately located development

- Policy SP8 which relates to the provision of new waste management facilities, should help reduce waste and promote the more efficient use of resources.

8.51 Potential negative impacts:

- Policy aims to protect resources, although in the long-term there is no sustainable way to manage finite resources.

- Development at this scale is likely to have negative impacts related to resource use and generation of waste

To increase the opportunities for energy generation from renewable energy sources

8.52 Potential positive impacts:

- Policy SP2 includes criteria on minimising energy consumption and promote use of renewable energy

- Policy SP9 includes policy for delivering renewable energy and energy efficiency

8.53 Potential negative impacts:

- The policy may be not sufficient to help realise the Welsh Assembly Government targets for reduced energy use from development.   This includes the use of renewable energy technology in new development. It would be good practice to include strategy policy setting targets for sustainability standards for new development and on or near-site renewable energy generation.

- Larger development sites, such as strategic sites and mixed use sites, have the potential to deliver schemes that make more efficient use of energy, for example through Combined Heat and Power or district heating schemes.

To ensure that there is a vibrant local economy which is at the forefront of a wider regional economy and provide diversity of employment within the County Borough and support a culture of entrepreneurship

8.54 Potential positive impacts:

- LDP strategy aims for regeneration of towns that should help bring employment areas that currently have poor access to jobs.

- Policy SP10 identifies strategic sites for employment and this should help deliver jobs in the County Borough.

- Tourism policy in SP12 should help deliver employment to areas in need, including Porthcawl and the Llynfi Valley.

8.55   Potential adverse impacts:

- The identified strategic sites are all in the southern part of the County Borough. These, therefore, may not provide the land and jobs necessary to meet the needs of businesses and employees of the wider plan area.

- Policy does not include the overall employment land supply.

To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity

8.56   Potential positive impacts:

- LDP strategy aims for regeneration of towns that should help achieve community regeneration and support wealth creation in more deprived areas.

- Policy that supports the quality of the natural and built environment will help preserve the County Borough as a location for growing businesses and attract new business investment.

8.57   Potential adverse impacts:

- The choice of employment location, due to allocations in excess of what is needed based on current take-up rates, could make it less likely that new businesses would choose to develop in communities in need to regeneration.

9   Mitigation of impacts

9.1   The SEA Directive requires that consideration is given to how any significant impacts identified during the SA process could be mitigated against.

9.2   The appraisal matrices of policies, shown in Appendix 5, contain details of how impacts of policies can be mitigated against. Mitigation of the potential adverse impacts of the strategy could be achieved in a number of ways as set out in paragraphs 9.3 to 9.9.

9.3   **Adjusting policy wording** to fine tune policy can help to successfully implement more sustainable development. This could include, clarifying wording on some policies to help deliver the desired policy output, such as setting requirements development should meet in order to get permission. Examples given in the policy appraisal matrices include, setting targets for affordable housing, housing density and renewable energy targets. Some development has the potential to have an adverse impact on the integrity of internationally designated nature conservation sites. Therefore policy could include criteria to ensure that development proposals recognise this and carry out appropriate assessment.

9.4   **Additional policies** should be included in the deposit LDP to provide the detail necessary to avoid impacts on implementation of development, and to provide the basis for planning application decisions. This could include policies on natural environment protection, transport requirements such as the need for transport assessments, sustainable construction requirements and design guidance.

9.5   Setting **requirements for developers** to show how they have addressed environmental and sustainability concerns through their development. This could include, where necessary, the need to prepare: Green Travel Plans, ecological assessments, flood risk assessments, appropriate assessment under the Habitats Regulations.

9.6   When remaining sites are **allocated** for development, it will be important to locate these so as to support the strategy. Locations will also need to be identified that help avoid direct adverse impacts, such as loss of biodiversity, impacts on landscape character, and avoiding minerals sterilisation. Sites should also aid regeneration and be in locations with good access to jobs, homes, services and public transport, to provide real alternatives to car travel.

9.7   The **phased release** of housing and employment sites could help delivery of allocations to help secure sustainable development. This could include prioritising development on those sites that perform better against sustainability objectives, and could include sites on previously developed land or in regeneration areas.

9.8   Preparing **up-to-date design briefs, or masterplans**, for each strategic allocation and large mixed use sites, could help to deliver more sustainable development in these locations. These documents should demonstrate good practice in sustainable construction and urban design. They could be adopted as Supplementary Planning Guidance, and be supported by policy in the deposit LDP. Design briefs could include details of:

- design protocols and the layout of development

- the mix of development that would be expected on site, including affordable housing provision, or 'community hubs'

- biodiversity protection or enhancement measures

- the sustainable construction standards that should be met

- the proportion of energy used on site that should be generated by on or near site renewables

- public transport, walking or cycling links.

9.9   Policy SP15 on infrastructure identifies how developer **contributions or obligations** can be used to deliver sustainability benefits associated with new development. Specific contributions could be towards public transport improvements, improvements to the public realm, and affordable housing. The use of Supplementary Planning Guidance on standard approaches to securing these can help deliver these benefits and ensure equity in the way this is carried out.

9.10   One of the principal ways to deliver development, and possibly mitigate against impacts, is to deliver the LDP in conjunction with **other strategies and plans** in the County Borough. This includes delivering high quality public transport to improve access, delivery of community and regeneration strategies to help deliver development sites, tourism strategies, and other plans and strategies on protecting and enhancing the natural and built environment.

10   Monitoring

10.1   There is a requirement for monitoring of the sustainability appraisal. This is to provide a check on whether the LDP is having an impact on delivering sustainable development, and trigger review as necessary.

10.2   The specific requirements of the SEA Regulations on monitoring are to:

"monitor the significant environmental effects of the implementation…with the purpose of identifying unforeseen adverse effects at an early stage"
(Regulation 17(1))

10.3   The sustainability framework is a good starting point for developing targets and indicators for monitoring. However, monitoring for the SA can be part of the wider monitoring process for the LDP, using a subset of the overall monitoring objectives. The SEA Regulations specifically state that monitoring for SEA can be incorporated into other monitoring arrangements (Regulation 17(2)), and therefore it is appropriate to combine with the Annual Monitoring Report for the LDP.

10.4   Monitoring need only begin once the LDP has been adopted and implementation begun. Therefore, a monitoring framework needs to be developed for the SA, as part of the full LDP. This will be a task for the future stages of the SA, in conjunction with developing the LDP monitoring framework.

10.5   Already, some of the monitoring proposals for the Pre-Deposit Proposals could be used to monitor sustainability issues. Table 10.1 shows some indicators that could be used to monitor the SA, although these are limited to those with a direct relationship with LDP policy. These are:

Table 10.1: Possible indictors and targets from LDP monitoring to be used in SA monitoring

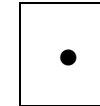| Indicator	Target
Number of planning permissions granted contrary to the advice of the Environmental Agency Wales (EAW) on flood defence or water quality grounds	95-100% compliance with EAW's advice.
Number of developments built to BREEAM 'very good' and 'excellent' standards	95-100% compliance
Number of improvements to public transport secured through 106 agreements	No target
Contribution of permitted renewable energy schemes to national targets.	No identified local target.
Increased vitality, viability and attractiveness of Bridgend, Maesteg and Porthcawl town centres.	Increased performance against TAN4 indicators
Number of former retail units permitted to change to residential use	Decrease overall rate
The annual number of overnight visitors to the County Borough.	Rise in figure over the LDP period.
Annual number of affordable houses built	Affordable houses built per annum by sub area.

11 Conclusions and recommendations

11.1 The implementation of the strategy will need to be controlled and monitored to verify that development is being delivered and whether it is helping to deliver the chosen strategy.

11.2 There is an evident need in the County Borough for the delivery of development to aid regeneration of communities. The plan area also plays a role in delivering employment to serve a wider south east Wales function, including supporting Cardiff. The delivery of development, necessary to realise the strategic objectives and vision for the Local Development Plan will primarily be by private developers. However, the current economic slowdown may adversely impact delivery in the next few years. This will need to be monitored to allow for contingency plans to be put in place, or alternative solutions found to secure sustainable delivery. LDP implementation should ensure that achieving sustainability and regeneration aims are not compromised by the current economic climate.

11.3 There will be some inevitable sustainability impacts through delivering the growth levels promoted through the Pre-Deposit Proposals. These will be predominantly related to environmental sustainability resulting from the land-take, natural resource use and environmental protection and possible increase in car trips. There will, however, be economic and social benefits from the strategy, if fully delivered.

11.4 There are a number of challenges to achieving environmental sustainability presented by the levels of growth and the strategy for the LDP. Without provision of an adequate and reliable public transport network, car dependency and use will increase. This will be from the distribution of development around the County Borough, the peripheral location of some of the strategic allocated sites, and the simple impact of there being more households, and therefore more cars. Increased car travel can have negative sustainability impacts related to increased congestion that can have adverse economic and health effects; and increasing air pollution contributing to climate change and health impacts. Development in the M4 corridor also risks worsening air quality in relation to increased movements of heavy goods vehicles.

11.5 Part of the solution to this is locating housing and employment near one another. This is an aim for the Bridgend LDP, although the strategy as it is set out may not be entirely effective in this, given the large amount of potential employment sites that may be developed out of step with housing provision. It would also be unrealistic to assume that co-location alone would reduce car use, as people will always need to travel between settlements to access jobs, services and for shopping. Therefore, the LDP will need to be influential in aiming for a modal shift away from car use, wherever possible. This may require the LDP being delivered in conjunction with other strategies that will deliver improved public transport and high quality cycle networks. It will also be the role of the LDP to lower demand for car use by controlling the layout and form of development, to reduce car dependence, and setting strict maximum car parking standards and requiring developers and businesses to contribute to achieving a modal shift.

11.6   A further challenge to achieving more sustainable development, will be from
the land required to deliver the growth proposed in the Pre-Deposit
Proposals. There is likely to be an environmental impact from development,
and therefore policies will need to be in place to guide development, in form
and location, to avoid adverse impacts on biodiversity, landscape character,
safeguarding minerals, the built environment and to avoid flood risk. Of
particular importance is the need to avoid harm to the internationally
designated nature conservation sites in the County Borough.

11.7   New development will also require good quality design principles to be in
place. Using up-to-date design guidance and development briefs can help
deliver high quality development, aesthetically, and in use of natural
resources. This will need to take into account, on-site renewable energy
generation, sourcing of materials, water and energy efficiency.

11.8   The strategic policies may need to be further developed to include the
elements necessary to deliver the vision and objectives for the LDP.
Currently, the policies may lack some of the detail that could be influential in
helping make decisions about delivering a sustainable strategy. It is
important that these strategic policies form the basic framework for giving
development consents, with the remaining policies of the LDP providing the
detail necessary to fine tune development proposals to avoid adverse impacts
and deliver benefits. Therefore, policies must include the detail necessary to
be used as the basis for granting or refusing planning applications related to
delivering the vision for the County Borough.

11.9   The mitigation measures suggested in the main SA Report should also be
implemented to help avoid, or mitigate against potential adverse impacts of
implementing the strategy. These include modifying policies to include
targets, site selection for allocations, securing planning contributions or
obligations and using other plans and strategies in combination with the LDP
to deliver development.

Appendix 1
Sustainability appraisal of the Local Development Plan Objectives

Key to appraisal symbols

The LDP objective is compatible with the sustainability objective and likely to contribute to the achievement of greater sustainability	●
The LDP objective is likely to detract from the achievement of greater sustainability according to the identified sustainability objective	**x**
The LDP objective does have a relationship with the sustainability objective, but the exact nature of this is complex or unpredictable, or multiple impacts potentially both positive and negative	**?**
No identifiable relationship between the topic covered in the policy and the sustainability concern	**–**
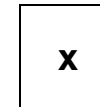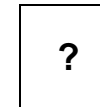
	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
PLACES																
OBJ1a Bridgend as a regional hub and the key principle settlement of the County Borough where major employment, commercial and residential development is focused. NR2, NR5, LS18	●	?	-	?	-	-	?	●	-	-	?	-	-	●	●	This objective should help to increase accessibility to new jobs, homes and services by providing a central focus for these developments. However, without maintenance and enhancement of travel choices, there could be adverse impacts on accessibility of these developments for residents of those settlements in the County Borough with poor access to Bridgend town.
OBJ1b Revitalise Maesteg by recognising its role as the principal settlement serving the Llynfi Valley which has the potential capacity and infrastructure to accommodate future growth. LS20, LS22, LS28, LS40	?	?	?	●	-	-	●	?	-	-	?	-	-	●	?	Delivering new development in Maesteg is essential in revitalising the role of the second largest town in the County Borough. It needs to be the focus of a large proportion of new development to reinforce its role as the main service centre for the Llynfi Valley. This obligation should help provide accessible jobs and services for the existing and future residents of the area. It will be necessary to ensure the allocation of land for new development can demonstrate deliverability and is meeting the needs of developer. This is essential in order to secure the necessary regeneration of the area.

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
OBJ1c To realise the potential of Porthcawl as a premier seaside and tourist destination which capitalises on the regeneration of its waterfront. NR1, NR3, LS30	?	?	-	?	?	?	●	?	?	-	●	-	-	●	●	Focus on Porthcawl as a tourism destination should help improve local wealth creation, although it will be important to ensure this includes the creation of high quality jobs and higher spend visits. Development should also proceed in a way that does not harm the biodiversity assets, including local internationally protected sites, nor the high quality landscape character. Regeneration of the waterfront should help provide new homes, make efficient use land and improve the built environment character; development will have to take into account risks of tidal inundation. The LDP should identify new employment sites.
OBJ1d To realise the strategic potential of the Valleys Gateway to provide for future development and facilities serving the whole of the County Borough. NR4, NR9, LS29	●	-	-	?	?	?	-	?	?	-	?	-	-	●	●	There is potential for the Valley Gateway to be a focus of development that has good access by public transport. Development in this location will need to reduce impact of additional transport from development on the M4 corridor. At least part of the site identified for development in this area currently used for community use, including playing fields, should be retained for this community use. This area is also important to the current economy of the County Borough and identifying additional employment land may be necessary.

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
OBJ1e To reduce traffic growth, congestion and commuting levels whilst promoting the safe and efficient use of the transport network. NR6, LS11, LS12, LS13, LS26	?	-	●	●	●	-	●	●	●	-	-	-	●	?	?	If successfully implemented this objective should help meet several sustainability objectives. Central to achieving this, is for the LDP policy and proposals, to help support a variety of travel choices and promote development that reduces the overall need for travel.
OBJ1f To support integrated transport solutions and measures that will encourage modal shift to more sustainable forms of transport for people and freight. NR6, LS11, LS12, LS13, LS26	?	-	●	●	●	-	●	●	●	-	-	-	●	?	●	This objective is closely linked with OBJ1e. Achieving integrated transport can have a variety of benefits including reducing the number and length of car journeys, helping to promote equitable access, and reducing congestion and resultant impacts on environmental quality.

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
ENVIRONMENT																
OBJ2a To promote, conserve and enhance the natural, historic and built environment of the County Borough. NR8, LS1, LS2, LS3	-	-	?	?	●	●	●	●	?	●	?	?	-	-	●	There is a clear positive relationship between this objective and sustainable development. However, in some instances it may conflict with meeting other objectives relating to growth and change. Preserving the quality of the natural environment also helps in protecting a vital economic asset to the region, attracting visitors and investment to the County Borough.
OBJ2b To tackle the sources of poor surface water and air quality. LS9, LS10	?	-	●	-	●	-	?	●	?	●	-	-	-	-	?	This is a positive objective for the LDP, although as with OBJ2a it may not be entirely in the control of the plan. Achieving this objective will also require road traffic to be reduced to help improve local air quality.
OBJ2c To manage development in order to reduce or mitigate against the risk and fear of flooding. LS7, LS8	-	-	●	?	-	-	-	-	●	?	-	-	-	-	?	Avoiding the risk of flood through careful siting and design of development is essential in achieving safe, healthy development. Recognising the importance of reducing the fear of flood is also positive in helping to protect residents' mental wellbeing, as well as their physically wellbeing during flood events.
OBJ2d To meet the Council's regional and local commitments for mineral resources, waste management and waste disposal.	-	-	-	-	-	?	-	-	?	-	?	●	-	-	?	There may be some potential conflicts of meeting objectives to safeguard minerals and those of relating to growth. The LDP must identify ways of implementing sustainable waste management, including through appropriate site allocations for new waste managements facilities.

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
NR10, NR11, LS14, LS15, LS16, LS17																
OBJ2e To contribute towards the energy needs of Wales with a focus on the promotion of renewable energy. NR7, LS6	-	-	-	-	?	?	?	●	●	-	-	●	●	-	?	Meeting energy needs through provision of renewable energy should bring a variety of benefits in achieving sustainable development, related to air quality, climate change, energy use and minerals. Depending on the type and scale of renewable energy development there may be some adverse impacts on the local environment, to be weighed against global benefits.
REGENERATION																
OBJ3a To build a more diverse, dynamic and self reliant economy and business environment which is allowed it to reach its potential. NR9, LS31, LS32, LS36	?	-	-	?	-	-	-	-	-	-	-	-	-	●	●	This objective should improve the resilience to economic changes, and provide a range of jobs to meet various needs of the resident workforce.
OBJ3b To provide a realistic level and variety of employment land to facilitate the delivery of high quality workplaces and job opportunities. NR1, NR9, LS31, LS32, LS33, LS34, LS35, LS36	?	?	-	-	?	?	?	-	-	-	?	-	-	●	●	Providing the land necessary to meet the diverse needs of the economy could help improve economic investment and endemic business growth in the County Borough. However, achieving the mix and quantity required by the market does risk environmental impacts, such as loss of greenfield land (with landscape and biodiversity impacts). It also potentially puts employment in locations that may have good access to the national road network, but less

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																good access to employment sites for the resident workforce of the County Borough. De-allocating, or re-allocating employment land for alternative uses may help make the best use of land. Therefore, the LDP policy should consider the benefits and impacts of identifying additional sites, or re-allocating employment land.
OBJ3c To bring the benefits of regeneration to the valley communities by directing new development to those areas at a scale which acknowledges their geographical constraints and infrastructure capacity. NR1, NR4, LS25	●	-	-	●	?	?	-	?	-	-	?	-	-	●	●	The valley communities, for the most part, share characteristics related to their coal mining history. In all there are issues related to access to employment and local services, and have areas of high deprivation. Some are also constrained in terms of land suitable for growth. New development to aid regeneration should be focused in these areas – tailored to meet the needs of local residents, whilst maintaining and enhancing transport links (affordable) with major service centres.
OBJ3d To create sustainable destinations which capitalise upon the environmental assets and tourism offer of the area which encourages people to visit and stay in the County Borough. LS30, LS43, LS44	-	-	-	?	●	●	●	?	?	-	-	-	-	●	●	This objective recognises the importance of high quality places in attracting investment and visitors to the area. This should aid in wealth creation, as well as helping to protect environmental assets.

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
OBJ3e To enable Bridgend Town to become an attractive and successful sub regional retail and commercial destination which meets the needs of its catchment. NR1, LS37, LS38	?	-	-	-	-	-	●	?	-	-	-	-	-	?	●	Bridgend town centre has the potential to provide a better retail offer. This could help reduce peoples' need to travel to other shopping centres, potentially reducing number and length of car trips.
OBJ3f To support realistic and viable town and district centres in the County Borough which are attractive and economically successful. LS39, LS40, LS41	●	-	-	●	-	-	-	?	-	-	-	-	-	?	?	It is essential that the villages of the County Borough each retain a community focus. The LDP should include policies and proposals that support existing services in these location, and allocations that encourage new provision.
OBJ4g To protect and promote the role of smaller shopping centres and freestanding local shops in the County Borough	●	-	-	●	-	-	-	-	-	-	-	-	-	-	?	Protecting local shops is essential in maintaining local communities and in reducing the need and distance travelled to meet day-to-day needs. This objective is closely related to OBJ3f. Shops should be retained wherever possible in village centres as the focus of these settlements, and where several uses can be provided in close proximity to one another. Single shops should also be preserved, particularly where they do, or could, provide for a community need.

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
COMMUNITIES																
OBJ4a To provide a land use framework that recognises the needs of deprived areas within the County Borough, and which affords those communities the opportunities to tackle the sources of their deprivation. LS24, LS27	?	?	?	?	-	-	-	-	-	-	-	-	-	?	-	This objective covers similar issues to OBJ3c, although with more of a social emphasis. It is hoped that this objective could achieve a variety of benefits for the deprived local communities, including provision of affordable homes, strengthening of existing communities, and improving health and wellbeing. Achieving these outcomes will depend, to some extent, on the implementation of other plans and strategies to address these issues.
OBJ4b To ensure that there is equality of access to community services for all sectors of the community, addressing the particular needs of children, young, older people and the less able. LS24, LS42	●	-	●	●	-	-	-	-	-	-	-	-	-	?	-	Achieving this objective is essential in order to deliver the social progress objectives of sustainable development, as equity is central to this concept. Providing accessible services can have benefits now and in the future to the residents of the County Borough, with benefits in terms of education, access to work and healthcare.
OBJ4c To deliver the level and type of residential development to meet the identified needs of	?	●	●	●	-	-	-	-	-	-	-	-	-	-	?	The delivery of housing is a principal goal of the LDP. Part of this provision will be delivering homes to meet the needs of all residents. Therefore, it will be necessary to provide good quality affordable homes in all parts of the

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
the County Borough ensuring that a significant proportion is affordable and accessible to all. NR5, LS18, LS19, LS20, LS21, LS22, LS23																County Borough, with particular emphasis on delivering new homes where this type of provision is currently lacking. Providing homes for all can have a variety of benefits in terms of achieving sustainable development, including health and wellbeing, community development and a providing for a resident workforce.
OBJ4d To provide for the required quantity and range of accessible leisure, recreational, health, social and community facilities throughout the County Borough. LS4, LS5, LS24, LS27, LS42	●	-	●	?	-	?	?	-	-	-	-	-	-	-	-	Background information shows that there are areas of the County Borough currently underprovided for in terms of playing fields and children's play space. These deficits need to be resolved, with new quality spaces provided where necessary through the LDP, with policies in place to ensure the long-term upkeep of these areas.

Appendix 2
Sustainability appraisal of housing growth options

Social progress which recognises the needs of everyone		
LOW	**MEDIUM**	**HIGH**
• Delivering lower levels of homes will result in a lack of affordable housing, particularly if the economy continues to grow, this may give rise to overcrowding or people having to move out of the County Borough. • Local people may be less able to afford homes in economic growth areas of the County Borough pushing them out of the area or into less accessible locations further from employment. • Potential for a changing community character in less affordable areas as local families move away, new people move into the area. • A low level of development may not be able to support the provision of associated services that would come from planning contributions and obligations associated with new development, for example schools, open space and transport improvements. This may impact the accessibility of services and facilities for new and existing residents.	• It is evident that the provision of homes at a medium growth rate would be less able to provide the number of homes to meet needs as high growth would, but more than a low growth option. • Suitable distribution of this number of new homes around the County Borough will be key to enabling better access to facilities by linking to existing town centres and employment areas. • This approach may not be able to support substantial additional provision of new services, shops and facilities as high growth options, as contributions to development may not be sufficient. Therefore there may be greater pressure on existing services.	• This approach may deliver a large amount of new homes, thereby helping ensure there is housing to meet all needs. • If the level of homes under a high growth approach is achieved then there may be changes to the community character of the County Borough as more people move into the area to live. • With a higher level of growth it may be possible to support the provision of a range of new facilities, shops and services throughout the County Borough, helping to ensure a better access for new and existing residents. In addition large scale 'urban extensions' can be planned to contain a mix of uses, including housing, employment and education that will improves access for future residents. • This level of housing may mean that housing is better distributed around the County Borough, with greater focus on valley town regeneration areas for instance. • Providing a greater number of homes than jobs in the area may have adverse impacts on the character and services available in the County Borough, as it runs the risk of turning parts of the area into 'commuter towns' supporting employment elsewhere in Wales. Such areas can often lack character and any community identity as all residents look outside the area to meet their day-to-day needs including for work, shop and cultural participation.

Effective protection of the environment		
LOW	**MEDIUM**	**HIGH**
• The low land take under a low growth option is more likely to see a protection of biodiversity and landscape of value. Although it will be important to respect biodiversity wherever it is found, even on previously developed land.	• Depending on the location of new allocations this approach has the potential to adversely impact on biodiversity and landscape where new greenfield sites are allocated. However this will be less than for a high growth option and it may be possible to identify locations where these impacts can be avoided or mitigated against.	• The large land take required by this option may mean that a larger green field land requirement is needed. This is very likely to have impact on biodiversity and landscape quality. • Building a large number of new homes in and around the towns of the County Borough will need to be carefully planned in order to protect and enhance the built character, large new developments have a substantial opportunity to make built environment contributions.

Maintenance of high and stable levels of economic growth and employment		
LOW	**MEDIUM**	**HIGH**
• It is unlikely that this lower level of growth will be compatible with strong economic growth in the area, as there will not be the workforce to support growth in the local area.	• This level of growth is likely to be able to support the economy of the County Borough, and may help promote more self-containment in the area for living and working.	• Higher rates of housing growth are likely to be better able to support high levels of economic growth, this is particularly the case as this option will have advantages in increasing the proportion of people in the working age demographic with benefits for the economy. • Higher housing levels may be able to support employment of other cities and towns of south east Wales by providing more affordable housing.

Prudent use of natural resources		
LOW	**MEDIUM**	**HIGH**
• The approach is likely to help previously developed sites allocated for housing to be developed in preference to greenfield land, due to limited choice of sites. • This approach may not lead to development in locations where it is needed, as allocations are already set this may mean accessibility of jobs and services are compromised as economic and housing growth cannot be planned together. • Fewer houses may mean that more people have to live outside the area and commute into Bridgend for work, which is likely to lead to increased car use and the environmental impacts associated with this. This includes air pollution with climate change related and health related effects as well as the consumption of non-renewable fuel resources. • A low growth rate offers low flexibility in the choice of most appropriate sites for new housing so that they are linked to existing and planned employment. This disjointed approach is unlikely to lead to the most sustainable pattern of development in terms of living and working locations, with the potential for the inefficient use of land and increasing the distances travelled for work commuting. • The lower level of development is likely to have a lesser demand for energy and other resources, although this may only be local in scale as housing demand to meet needs may be built elsewhere outside the County Borough resulting in the same level of residential development.	• This approach may be most suitable in finding a balance between economic growth and housing provision, and help the better self-containment of the County Borough in terms of jobs/homes. This should have the advantage of reducing car commuting and associated environmental and natural resource impacts. • This level of growth is unlikely to be able to support larger new urban extensions to existing towns, and therefore it will not be possible to create self-contained new 'sustainable communities' a mix of different uses in easy proximity to one another as they will be too small to contain a sufficiency. This therefore may encourage more car travel, with associated local and global impacts. • A level of growth above that already allocated for (as in the low growth approach) will also allow a greater choice of sites which may help promote mixed use development associated with the development of new employment land.	• Depending on the level of economic growth in the area this level of housing growth could have adverse impacts on reducing car use. This will particularly be the case if people who continue to work in other parts of South East Wales move to Bridgend due to lower house prices and must commute daily to work elsewhere. This is not compatible with objectives of reducing resource use. • However a higher growth rate may make it possible to build carefully planned new extensions to towns in the area that can support a mix of uses, including housing, employment and services, that could help reduce the need to travel and therefore the use of natural resources. • This level of new housing will require a large amount of land including greenfield sites. If allocations are not phased this could lead to a green field sites being developed in preference to previously developed land, which would mean land is being used inefficiently. However given the quantity required it is likely that all allocations will be taken up in the long-term by the end of the plan period, including previously developed land. • This level of housing development will use a large amount of natural resources in construction and energy and water during their operation. However as housing is likely to have been provided anyway, albeit outside the County Borough pursuing this approach in terms of resource use may not be significant. • A level of growth above that already allocated for

		(as in the low growth approach) will also allow a greater choice of sites which may help promote mixed use development associated with the development of new employment land.

**Appendix 3
Sustainability appraisal of the economic growth options**

Employment Options

Three options for employment are presented: low, medium and high growth. However, these growth areas refer to the amount of land that will be allocated as actual job provision will depend on other factors, including the type of employment in each site. Employment growth may also occur on existing employment sites, through intensification of use, particularly in service sector jobs.

These three levels of growth have not previously been subject to a comparative sustainability appraisal. The LDP, although needing to make provision for employment growth, is not required to implement a specified number of new jobs as it is for new homes.

No matrix based sustainability appraisal of the employment growth options has been carried out, as the matters on which the assumptions would have to be based would be too great to make any such appraisal reliable, or useful. To enable this type of comparative matrix appraisal the SA would have to make assumptions about implementation that are really beyond the role of the appraisal. For instance, the appraisal would have to make assumptions on the following matters – and if incorrectly made could give very misleading outputs to the SA.

- the actual take-up of employment land does not necessarily depend on the amount of land allocated
- the growth options are for the whole County Borough and therefore the location of growth cannot be assessed
- the number of jobs provided on any land allocation will vary based on the type of business developed
- low and medium growth options could give rise to the same level of allocations

Therefore, a more simple appraisal has been carried out, this picks out key sustainability objectives that relate to the sustainable delivery of employment land, that any spatial strategy should take into account. This appraisal of options makes the following assumptions about how the economic growth options would be implemented:

- higher employment land allocation options would result in a greater land requirement
- under higher employment land allocation options there would be greater opportunity for employment distributed throughout the County Borough
- all land allocations would be made in accordance with the selected strategic spatial strategy for the LDP
- allocations would be taken up by new businesses rather than business re-locating within the County Borough.

Access to employment

More land allocated for employment is likely to result in the potential for more dispersed employment growth around the County Borough, thereby helping provide more accessible employment. This should result in a reduced need to travel, and therefore positive sustainability impacts relating to reduced car use, such as improving or maintaining air quality, contribution to climate change and health impacts.

However, the converse could also be true, a high employment land bank of allocations may mean, even though dispersed sites are available, the sites selected for development are those that relate more to the demands of the market, than achieving wider regeneration benefits. So development may come forward in locations close to the motorway but are not tailored to the needs of the workforce or to provide local jobs. This may increase car travel as people travel to work at these sites from throughout the County Borough and the wider South Wales area.

If too few sites are allocated this also risks decreasing accessibility, especially if sites are not distributed throughout the County Borough area. It may also have the impact of reducing the attractiveness of the area to growing businesses and inward investment reducing the overall number of jobs in the County Borough, and potentially increasing employment deprivation.

The efficient use of land
If the amount of land allocated for employment is substantially in excess of the land area that is needed to meet employment needs it may lead to the inefficient use of land. Where sites have long been allocated for employment use but have shown very little evidence of ever coming forward for development it would be beneficial in achieving sustainable development to review these allocations. Review may reveal that the sites could be better allocated for an alternative use, including housing or a mixed use, or even de-allocated for development entirely. The advantages of this is it would help ensure land is brought forward for its most suitable use, helping to deliver a sustainable spatial strategy or protected from the impacts development.

Where too little land is allocated for housing then there is the risk that employment land will come forward anyway , but outside the spatial strategy and therefore potentially in locations that are not suitable to deliver the desired sustainable strategy.

Protection of the environment
More land will be allocated under the high growth option, there will be nothing to prevent all of this land being developed if there is the demand. Therefore, this high growth approach could have detrimental impacts on biodiversity, landscape character and possibly built heritage, depending on the location and characteristics of the site.

A larger allocation of sites may also mean that some sites are less favourable in terms of the biodiversity and landscape assets of the site, and where these are allocated there is nothing to prevent these being the first sites developed.

Wealth creation

Allocating a greater range of sites in different locations and to meet different needs should help encourage investment in the area. Allocating fewer sites may make the area less attractive to those wishing to invest.

The distribution of housing will need to ensure that employment land is allocated in areas to encourage the growth of indigenous businesses, including start-ups and expanding business, in addition to larger sites that may be required by larger national or multi-national organisations. The type of land allocated will also need to respond to improving the local economy and securing benefits for local people, in addition to strategic South Wales and British economic needs.

Overall

In order to deliver a sustainable spatial strategy for employment development it is likely to be preferable to tailor the amount of land allocated for employment to the needs of the County Borough. This will include:

- allocating land in areas that are in need of regeneration and new employment opportunities, and this may require additional allocations
- reviewing all non-committed existing allocations to ensure that they are helping to deliver the preferred spatial strategy, in terms of quantity and location of employment land
- re-allocating or de-allocating employment sites that are better suited to an alternative use, including mixed use, or sites that are no longer suitable or unlikely to be deliverable for development, respectively
- providing some level of choice of sites and locations for new development to encourage the growth of indigenous business as well as those that serve strategic need
- possible phasing of employment site release to ensure the best use of land, protection of landscape and biodiversity assets, and to aid regeneration – in order to deliver a sustainable spatial strategy

Appendix 4
Sustainability appraisal of spatial strategy options

The following broad assumptions have been made in the sustainability appraisal of alternative spatial strategies:

- alternative strategies will be fully implemented through policy
- policies will be in place to mitigate against adverse impacts on the natural environment
- development will be bought forward with a focus on previously developed land in preference to greenfield land
- development referred to in the strategy refers to all types of development, including housing, employment and retail
- strategies refer to the distribution of development that is not already accounted for through housing and employment land commitments (it is assumed that allocations not yet committed can be reviewed, especially employment land).

Assumptions have also been made for individual strategy options to allow comparison in the sustainability appraisal:

Economic Led:
- employment being directed to locations base on the existing employment sites, and undeveloped allocated employment sites
- Bridgend would see the majority of development, followed by Llynfi Valley including Maesteg, Valleys Gateway and Pyle / Kenfig / Cornelly would also see some development, with little or none in all of the Valley areas or Porthcawl
- Reduced travel to work times for Bridgend residents and those in Llynfi Valley
- No change to travel times for those in the Valley areas or Porthcawl
- Development accommodated mainly on previously developed land

Regeneration Led
- Development would be directed to locations to respond to regeneration initiatives that are already in place
- the Llynfi Valley, particularly the Upper Llynfi Valley and Maesteg would receive a significant proportion of new development
- the Valleys Gateway area would also receive a large proportion of the development
- More development is directed to Porthcawl, the Ogmore and Garw Valleys with this option than under the other options, and this may require some greenfield land take
- Pencoed has no regeneration strategies in place and therefore it would not receive any newly allocated development
- Following this option could mostly be accommodated on previously developed land, although the option does imply that development may be required on former school playing fields.
- To achieve best results the LDP strategy would need to be implemented in conjunction with other strategies to help deliver development.

Population and Settlement Led:

- the distribution of development would reflect the existing patterns of development in the County Borough
- the majority of development would be directed to Bridgend, although this is only around half as much as the economic led strategy
- least development in the Ogmore and Garw Valleys, although the quantity would be greater than the economic led strategy
- this strategy has the greatest amount of development directed towards Pencoed
- Porthcawl and the Llynfi Valley would receive some of the development, however, this would not be as much as under the regeneration led strategy

	Strategy 1: Economic Led	Strategy 2: Regeneration Led	Strategy 3: Population and Settlement Led
Accessibility	This option would have an undesirable impact on those communities of the County Borough in most need of better access to essential services and facilities: the Garw and Ogmore Valley Villages. No new development focused on these areas would see their continued decline, with possible accumulative adverse impacts. Accessibility to jobs for residents of new homes would be improved by proximity to employment land. This approach may also help create more compact residential areas where more services could be provided.	This option is aimed to help the regeneration of towns and villages of the County Borough. This should help provide housing and services the locations where there is a need, therefore helping to improve accessibility. However, this option does create a greater disparities between the location of housing and the location of employment, meaning that in some instances job accessibility will not be so good, particularly for those communities with poor transport links.	This option would see a very wide distribution of development. This could have adverse impacts on improving accessibility to jobs and services. However, new development in the Ogmore and Garw Valleys could help support service provision in these locations.
Housing	New housing focused in Bridgend could help provide development to meet affordable needs. No new housing development in other areas would exacerbate issues of affordability in these areas.	This option will help provide housing in a range of locations throughout the County Borough, and this should help meet peoples' housing needs.	The distribution of development could help to provide homes in a range of locations to meet a diverse need.
Health, safety and security	The provision of development has the added benefit of being able to secure financial, and other, contributions to new	Development will support regeneration initiatives in these areas, helping to maintain populations in those towns and	The wide-distribution of development throughout the County Borough may mean that in any one location contributions from

	community facilities, including schools, health services, and open space provision. Therefore areas with no new housing will miss out on this additional provision, with potential adverse impacts on regeneration initiatives for these towns and villages. Equally new development will put additional pressure on existing facilities, therefore where this development makes insufficient contribution to developing new facilities there could be an adverse impact. The M4 corridor suffers from quite poor air quality, therefore, this as this option puts more population in this area this location with potential negative impacts for health.	villages in need which can facilitate delivery of health, education and other services. In some locations, where there is lower market demand, there may need to be incentives for development, potentially reducing the financial and other contributions from development with implications for delivering new services and facilities. This option may require development on school playing fields, and policy should ensure that this does not harm the availability of public open space for sport and recreation. The M4 corridor suffers from quite poor air quality, therefore, as this option puts more population in this area this option has potential negative impacts for health.	development are not sufficient to support expanded and improved local services, with a potential adverse impact on provision of community and health services.
Community	Lack of new development in the Garw and Ogmore Valley villages will have an adverse impact on these communities, as these areas are in need of focused development to achieve regeneration benefits for these areas.	This option intends to reinforce the existing communities of the County Borough, by directing development to those areas in need of regeneration. This should have a positive impact on strengthening communities, ideally with knock-on impacts of addressing issues of social disadvantage in these areas.	Distributing development throughout the County Borough should help to meet the needs of communities. However, development in Maesteg and Porthcawl may not be at the level to support the desired regeneration and invigoration of these towns.
Biodiversity	There is the possibility that this option would require greenfield land take near Bridgend to accommodate new homes, this could have adverse impacts on biodiversity. However, the capacity of	Much of the new allocations for development could be located on previously developed land under this option. However, some greenfield land-take may be required and therefore	As with other options this option is likely to see the majority of newly allocated development accommodated on previously developed land. However, to meet the development needs in Pencoed there

	settlements is not known and therefore it is not possible to draw a clear conclusion on sustainability impacts. Refer to HRA Screening Assessment	policies will need to be in place to mitigate against impact on biodiversity. Refer to HRA Screening Assessment	would need to be additional greenfield allocations, with the potential for adverse impacts on biodiversity. Policies will need to be in place to help avoid these impacts. Refer to HRA Screening Assessment
Landscape	There is the possibility that this option would require greenfield land take near Bridgend to accommodate new homes, this could have adverse impacts on the landscape. However, the capacity of settlements is not known and therefore it is not possible to draw a clear conclusion on sustainability impacts.	Much of the development could be located on previously developed land under this option. However, some greenfield land-take may be required and therefore policies will need to be in place to mitigate against impact on landscape quality, particularly if development is required on valley edges or other raised sites.	As with other options this option is likely to see the majority of newly allocated development accommodated on previously developed land. However, to meet the development needs in Pencoed there would need to be additional greenfield allocations, with the potential for adverse impacts on biodiversity. Policies will need to be in place to help avoid these impacts.
Built environment	Extra pressure of development in Maesteg and Bridgend could have adverse impacts on the built environment character of these areas. However, this could be mitigated against through appropriate design policies.	This option has the advantage of putting development in locations throughout the County Borough, including some areas that have declining built environment quality. Therefore, this option could help address some of these issues and bring improvements to the built environment.	This option has the advantage of putting development in locations throughout the County Borough, including some areas that have declining built environment quality. However, development levels may not be sufficient in some locations, such as Porthcawl to achieve the planned for improvements to the town.
Air	Air quality impacts are likely to come from increased traffic. This option provides a good opportunity to reduce length and number of car commuting journeys by putting new homes in close proximity to new employment. However, travel from the Valleys and Porthcawl will remain the same. In addition this option focuses a large amount of development in Bridgend, there is therefore the possibility that this could have adverse impacts on local air quality in the town through increased congestion.	Air quality impacts are likely to come from increased traffic. This option does rely on some level of continued travel to meet employment needs, therefore there is the potential for adverse air quality impacts. Putting in place a choice of more sustainable transport modes may help address this. Also, it is hoped regeneration initiatives will help support local services and facilities, reducing the need to travel to meet day-to-day needs.	Air quality impacts are likely to come from increased traffic. This option does rely on some level of continued travel to meet employment needs, therefore there is the potential for adverse air quality impacts. Putting in place a choice of more sustainable transport modes may help address this. Also, it is hoped regeneration initiatives will help support local services and facilities, reducing the need to travel to meet day-to-day needs.

Climate change	New development will have to be designed in a way to avoid the impacts of climate change, for example flood, extreme weather events and increased summer heat.	New development will have to be designed in a way to avoid the impacts of climate change, for example flood, extreme weather events and increased summer heat.	New development will have to be designed in a way to avoid the impacts of climate change, for example flood, extreme weather events and increased summer heat.
Water	New development concentrated in one area may put extra pressure on the existing waste water treatment facilities. This will have to be taken into account in planning for new development to ensure that technology and capacity is in place to protect the water environment.	New development concentrated in one area may put extra pressure on the existing waste water treatment facilities. This will have to be taken into account in planning for new development to ensure that technology and capacity is in place to protect the water environment.	New development concentrated in one area may put extra pressure on the existing waste water treatment facilities. This will have to be taken into account in planning for new development to ensure that technology and capacity is in place to protect the water environment.
Land/Soil	There is the possibility that this option would require greenfield land take near Bridgend to accommodate new homes, this could require additional land take. However, the capacity of settlements is not known and therefore it is not possible to draw a clear conclusion on sustainability impacts. Little new development in the Garw and Ogmore Valley Villages could mean that opportunities to reclaim contaminated land are not taken.	Much of the development could be located on previously developed land under this option, with a positive benefit for the sustainable use of land. However, some greenfield land-take may be required and therefore policies will need to be in place to ensure this does not harm the soil resource. Under this option there may also be opportunities to bring former industrial sites back in to use, this can help in the remediation of contaminated land.	As with other options this option is likely to see the majority of newly allocated development accommodated on previously developed land. However, to meet the development needs in Pencoed there would need to be additional greenfield allocations, with adverse impacts on the sustainable use of land. Policies will need to be in place to help avoid these impacts.
Minerals and waste	New development may conflict with objectives of safeguarding mineral supplies, although this impact will depend on where safeguarded areas are and where development is proposed. Focusing housing on the more accessible parts of the County Borough may be beneficial in creating more sustainable waste management systems by reducing	New development may conflict with objectives of safeguarding mineral supplies, although this impact will depend on where safeguarded areas are and where development is proposed. Distributed development may make sustainable waste management and handling and treatment of waste close to its source more difficult.	New development may conflict with objectives of safeguarding mineral supplies, although this impact will depend on where safeguarded areas are and where development is proposed. Distributed development may make sustainable waste management and handling and treatment of waste close to its source more difficult.

	the distance waste created by new development has to travel for treatment or disposal.		
Renewable energy	All development above a threshold size should include a proportion of renewable energy generation. This will be more easily achievable on larger development sites, perhaps including urban extensions to Bridgend.

This option may miss the opportunity of creating new development in Garw and Ogmore Valley areas that makes use of the good wind resources in the head of valley locations. | New development should incorporate renewable energy generation.

This option includes more new development in the Valley communities than any other option, this raises the potential for using wind energy to generate local power supplies for new development in these upland locations. | New development should incorporate renewable energy generation.

This option provides for more new development in the Valley communities than under the Economic Led option, but less than the Regeneration Led option, it raises some potential for using wind energy to generate local power supplies for new development in these upland locations. |
| Employment | This option will have positive implications for the majority of new residents of new development as housing will be in good proximity to employment. However, existing residents may be adversely effected in Porthcawl and the Garw and Ogmore Valley communities by lack of nearby employment. | This option does not link new housing development to employment and therefore access to jobs may be reduced.

However, implementing a regeneration strategy may help bring new employers into areas of need, helping these communities gain better access to jobs. | This option does not link new housing development to employment and therefore access to jobs may be reduced. In addition, where regeneration strategies have been developed that require new development as the driver, this strategy may not direct sufficient development to these locations to meet needs. |
| Wealth creation | For the main part this option is likely to put development in locations that are favoured by the market and be positive for wealth creation. However, this option may stifle economic growth in Porthcawl as there will not be a resident workforce to meet needs. | Development in Porthcawl should help and promote this area and encourage inward investment in the County Borough. | This option aims to continue with the existing pattern of development with very little change to the status quo, therefore it is unlikely to actively improve the wealth creation in the County Borough. |

**Appendix 5
Sustainability appraisal of strategic policies**

These matrices show an appraisal of the Strategic Policies contained in the Pre-Deposit Proposals against the full set of sustainability objectives developed for the SA process, as shown in the SA Report, Section 3.

The appraisal of policies shows a simple symbol summary of each policy's performance against the sustainability objectives. Further details of the process can be found in section 8.

Key to appraisal symbols
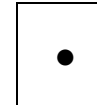
Likely to contribute to the achievement of greater sustainability according to the identified objective	●
Likely to detract from the achievement of greater sustainability according to the identified objective	**x**
Likely effect but too unpredictable to specify, or multiple impacts potentially both positive and negative	**?**
No identifiable relationship between the topic covered in the policy and the sustainability concern	**–**
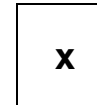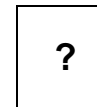
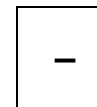| SP1 – Strategic development distribution		
Policy Summary: This policy sets out the intention of the strategy to deliver regeneration in a sustainable way. To aid strategy implementation this identifies the main areas that will be the focus for growth, these are Bridgend, Porthcawl, the Upper Llynfi Valley and Maesteg, and the Valley Gateway. It also states development in other areas will have to be within settlement boundaries (although these are not shown at this Stage in the Pre-Deposit Proposals). This policy has a key role to play, alongside policies on housing and employment development, on setting the spatial strategy for the LDP.		
Accessibility	●	This policy should help direct development to areas in need of regeneration, helping to provide accessible services and jobs.
Housing	●	This policy should help direct new housing development to the locations where it is required to achieve regeneration benefits.
Health, safety and security	-	This policy does not directly relate to this sustainability objective.
Community	●	There are likely to be community benefits of directing growth to those areas in need of regeneration. Some communities in the County Borough are in need of immediate action to strengthen town / village centres, to help improve community identity and well-being, this policy should help in achieving this.
Biodiversity	?	It is not clear what the relationship between this policy and this objective is, greater clarity could be given in the policy on the amount of land that would be required to meet growth needs.
Landscape	?	It is not clear what the relationship between this policy and this objective is, greater clarity could be given in the policy on the amount of land that would be required to meet growth needs.
Built environment	?	There is an opportunity in implementing this objective to deliver new high quality development to enhance and complement existing built character. This will need to be carefully managed to ensure the delivery of good quality design.
Air	?/x	The primary way air quality impacts can be reduced / maintained is through avoiding an increase in car travel by promoting development in locations with good access. The approach of this policy sees new development located in areas that are at risk of reduced air quality, along the M4 corridor, therefore new development will have to ensure that there is good access for employees by alternatives to car travel by providing local housing. There may be some inevitable air quality impacts if new employment development in these locations is related to distribution and other employment uses that generate a large amount of additional heavy goods vehicle movement.
Climate change	-	New development will need to ensure these impacts are taken into account, although there is no direct link between this policy and climate change.
Water	-	New development will need to ensure these impacts are taken into account, although there is no direct link between this policy and water quality issues.

Land/Soil	?	Some of the growth areas will require the use of greenfield land for development. However, some development will be directed to previously developed sites and therefore this should ensure the best use of land. Including a target for the proportion of development to be delivered on previously developed land could aid this. Under the preferred strategy it may also be that contaminated land is reclaimed and bought back into good use.
Minerals and waste	?	The impacts of this policy on meeting this objective will depend on the location of new development, as there are coal, and sand and aggregate resources in the County Borough that should be safeguarded.
Renewable energy	?	The policy does not have any direct relationship with meeting this sustainability objective, although large scale new development will need to take into account on-site and off-site renewable energy generation.
Employment	●	This policy promotes growth in areas in need of regeneration, part of this growth should be employment development and this should help in providing accessible employment for all. The Valley Gateway area, in particular, can help in job provision for communities in the Garw and Ogmore Valleys.
Wealth creation	●	This policy promotes growth that should help enable wealth creation in the County Borough through regeneration initiatives and helping to provide the locations for new business development.

Sustainability Summary

The policy identifies the need for growth that will aid regeneration in defined parts of the County Borough. The policy gives some spatially specific information on which areas are identified for growth, and that other development will have to come forward within the settlement boundaries, although these boundaries have yet to be defined at the Pre-Deposit Proposals stage of the LDP.

In order to help delivery of the chosen spatial strategy, identified in Chapter 9 of the Pre-Deposit Proposals, the policy could be more detailed. It could include information on the roles of settlements, and the expectations for development in rural areas. This policy has clear links to that on housing and employment development.

Main impacts

Exact impacts are difficult to identify given the lack of detail about the roles of specific towns and villages and the level of development directed to each. However, it should help achieve sustainability benefits relating to social progress and meeting the regeneration needs at growth points; with possible negative impacts related to the use of land and on air quality.

Recommendations and mitigation

- Some additional detail of the strategy could be included in the policy on the roles of settlements and the location of strategic growth areas, similar to the information contained in Table 9.1.
- Policies will need to be developed to address issues relating to development outside settlement boundaries, biodiversity and landscape protection and delivering sustainable construction. Settlement boundaries also need defining.
- Policy should avoid using ambiguous wording, such as 'will be favoured' as this may not provide the rigour on which development proposals can be judged.
- Policies will need to be put in place to ensure new development takes into account the impacts of climate change, including avoiding areas at risk of flood and creating urban heat islands.

SP2 - Sustainable place making principles		
Policy Summary:		
The policy includes a comprehensive list of criteria with the aim of delivering more sustainable development. These criteria will need to be supported by more detailed policy to ensure that sustainability benefits are fully realised.		
Accessibility	●	Part of this objective is to ensure new development takes into account sustainable transport, and this should help meet this objective. There is also a criteria on 'equity of access' and it is assumed that this applies to access of buildings and overall development access, clarity in the policy could enhance delivery of these aims.
Housing	?	The policy does not directly relate to housing, however the protection of residential amenity should help in creating healthy places to live.
Health, safety and security	●	The policy includes several criteria that should help in the protection of health of residents. This includes designing development to help avoid crime, reducing risk of pollution and minimising flood risk.
Community	?	This policy could help contribute to improving communities by creating new high quality places to live, through high quality urban design and designing out crime.
Biodiversity	●	Biodiversity protection and enhancement is part of this policy and highlights the importance of this principle.
Landscape	-	Policy does not directly address issues of landscape and this could be included.
Built environment	●	The policy includes criteria of delivering good quality built development and development that does not adversely affect amenity, this should help in meeting this objective.
Air	●	The policy includes criteria that aim to promote more sustainable travel through the location and layout of development, this should help to address air quality issues related to car travel. Policy also aims to help avoid air pollution, although greater detail may be necessary on showing how this will be achieved through planning policy.
Climate change	●	The policy includes criteria on reducing flood risk and this should help in meeting this sustainability objective, although more detail could be added on the sequential approach that should be applied to avoiding flood risk.
Water	●	The policy includes the need to protect water from pollution, and implementing infrastructure for the proper disposal and treatment of sewage.
Land/Soil	?	The policy promotes the efficient use of land, although this does explicitly require that previously developed land be developed in preference to greenfield land.
Minerals and waste	?	The policy includes criteria on ensuring the appropriate disposal of waste, although this should perhaps be worded to ensure the appropriate treatment of waste in preference to disposal.
Renewable energy	?	The policy does refer to the need to help promote renewable energy generation, however it may be suitable for the policy to have more detail on these matters as part of strategy. This could include the need to generate part of the energy requirements on larger sites from renewable sources, and the use of the Strategic Areas of Search for delivering national grid schemes.

Employment	-	This policy does not directly relate to meeting this objective.
Wealth creation	?	This policy does not directly relate to meeting this objective, although by creating and maintaining a high quality built environment it may be possible to improve the attractiveness of the area to inward investment.

Sustainability Summary

The policy aims for more sustainable development and sets out a variety of matters through which development will need to be tested to help deliver sustainable development. While the overall the approach of the policy should help in securing more sustainable development, more certainty could be provided on how these criteria will actually be used to test planning proposals. This could be enhanced by including more specific targets or thresholds in the criteria, for example requirements for meeting sustainable building standards. Changes in wording could also raise the importance of these matters in guiding the type and form of development.

Main impacts

There are unlikely to be any significant adverse sustainability impacts from this policy, although there is scope for improving the policy wording and detail to ensure no opportunities are lost for implementing more sustainable development through ambiguously worded policy.

Recommendations and mitigation

- The delivery of expectations could be improved through including firm thresholds and targets, such as those in the Code for Sustainable Homes or meeting BREEAM Standards.
- Criteria could be included on the importance of protecting landscape character
- Policy wording could be tightened to make these criteria a requirement, rather than an objective, such as 'development will be refused where..'
- It should be made clear in policy how criteria will be used in making decisions on planning applications
- More detail could be included in the policy about the need to avoid flood risk through a sequential choice on making decisions on suitability of development in flood risk areas
- The policy is not clear on whether precedence will be given to development on previously developed land over greenfield land
- More detail should be given on how development should secure the delivery of renewable energy, particularly on-site and micro-renewable schemes

SP3 – Strategic transport planning principles		
Policy Summary:		
This policy addresses the transport needs of new development, prioritising sustainable transport including public transport, walking and cycling. The policy includes details of locations that should be the focus for improved transport and the strategic transport schemes that need to be delivered in the County Borough. This policy also includes road improvements as well as other transport initiatives.		
Accessibility	●	The intention of this policy is to improve accessibility to jobs and services for all in the County Borough, by locating development near to transport routes and helping to deliver improved public transport.
Housing	-	This policy has no direct relationship to this sustainability objective.
Health, safety and security	?	Providing equitable transport access to health services is essential in delivering more healthy communities. Some road improvements may also help to improve the safety of roads.
Community	?	Improved transport access can help support communities in a variety of ways, including access to essential services and jobs. Also, linking up communities can help people feel connected to the wider area and access opportunities that are not available in their local neighbourhood. To maximise these benefits the policy will have to be implemented in association with other strategies and plans on promoting good quality and affordable travel.
Biodiversity	?	This policy does not directly relate to meeting this objective. However, some development may require new land take with possible impacts on biodiversity, policy will have to be in place to help avoid and mitigate against adverse effects.
Landscape	?	This policy does not directly relate to meeting this objective. However, some development may require new land take with possible impacts on landscape character, policy will have to be in place to help avoid and mitigate against adverse effects.
Built environment	?	This policy does not directly relate to meeting this objective. However, some new transport infrastructure will require some built development, policy will have to be in place to help ensure this of a high design standard and compliments and enhances its setting.
Air	?	There will be mixed impacts from this policy. Clearly there is an overall policy intention for implementing more sustainable modes of transport, with potentially positive impacts on air quality through reduce car dependence. However, new road provision will do little to reduce car use, and therefore the effects of these type of schemes may have some adverse impacts on air quality.
Climate change	-	This objective relates to adaptation to climate change and therefore the policy does not have any direct relationship with this objective.
Water	-	This policy is unlikely to have any effect on meeting this objective, subject to new development being designed in accordance with good water management policy, particularly for road run-off.
Land/Soil	-	This policy does not directly relate to meeting this objective. However, some development may require new land take. That policy will have to be in place to help avoid and mitigate against adverse effects.

Minerals and waste	-	This policy does not directly relate to meeting this objective.
Renewable energy	-	This policy does not directly relate to meeting this objective.
Employment	●	Improved access is likely to be beneficial in terms of meeting employment needs of the resident workforce. This policy should help improve peoples' access to jobs throughout the County Borough, as well as promoting the more sustainable location of development.
Wealth creation	●	A good quality transport network in the County Borough will help to encourage wealth creation through improving the accessibility of sites for indigenous economic growth and encouraging inward investment.

Sustainability Summary

Overall the intention of this policy is supported in seeking more sustainable development. Provision of improved public transport routes and links and promoting cycling and walking can help ensure an accessible area, with greater equity in access to services and jobs. Promoting better spatially linked development to reduce the overall need to travel should also have beneficial impacts, although this will need to be delivered in combination with other LDP policy on the distribution of development to direct this to more accessible areas.

Road capacity improvements are likely to have adverse sustainability impacts through increase car use and therefore having adverse effects on air quality, climate change and health. There may be economic benefits in terms of reduced congestion, however these may be lost in the long term as traffic increases to fill spare capacity, with air quality impacts and contributions to climate change.

Main impacts

Impacts of this policy are likely to be generally positive in helping to reduce reliance on car use, and increase equitable access for all.

There may be some negative impacts for increasing road capacity that may lead to increased car use.

Recommendations and mitigation

- Other plan policies will help mitigate possible adverse effects of implementing new transport schemes. For example where land is required for development policies on biodiversity, landscape, built environment etc. will have to be in place to help avoid and mitigate potential adverse effects
- New roads and development will have to be planned to avoid the cumulative harm to air quality
- Achieving transport mode shift away from car use will have be delivered in combination with other plans and strategies, for example on providing affordable transport, new public transport, and walking and cycling routes.

SP4 – Conservation of the natural environment		
Policy Summary: The intention of this policy is to protect and enhance the natural environment through the appropriate control of development.		
Accessibility	-	This policy does not directly relate to meeting this objective.
Housing	-	This policy does not directly relate to meeting this objective.
Health, safety and security	?	Protecting and enhancing the natural environment should have benefits for health, this will include protecting areas for outdoor recreation, and the health benefits that can be attributed to having a high quality living environment and access to greenspace.
Community	?	The benefits for communities of protecting the natural environment can come from the opportunities this provides for outdoor recreation, helping people connect with their local environment, and protecting locally distinctive features. Integrating open space into development can also enhance living environments, and in combination with other strategies help promote community initiatives for renewal..
Biodiversity	●	This policy specifically relates to meeting this objective, and should help deliver positive outcomes. It may be possible to include wording in the policy to ensure 'no net loss of biodiversity' on any development site, which should help ensure new development, wherever it is located, takes into account the current biodiversity resource as part of development proposals.
Landscape	●	This policy specifically relates to meeting this objective, and should help deliver positive outcomes.
Built environment	?	This policy does not directly relate to this objective, although retaining open space and ecological features in built-up areas can have significant impacts on their quality, for instance retaining large trees, hedge-lines and natural landscaping. To recognise the importance of ecological diversity in the urban environment could be specifically referred to in this policy.
Air	?	Retaining and enhancing the natural environment particularly trees and other vegetation. The policy does include a criteria to protect air quality, although it does not necessarily state how this will be implemented. Other policies of the LDP that lead to increased car or HGV movements may have an inevitable adverse impact, in conflict with this policy.
Climate change	?	Changes in the climate may have an impact on the natural environment of the County Borough. It therefore may be suitable for the policy to specifically recognise this, for example by including policy criteria to protect the linkages between habitats that allow for species migration, such as hedges, ponds and groups of trees.
Water	?	The policy includes the criteria to protect the quality of water, with potential positive benefits for water quality. However, it may be that this will need to be implemented through other policy on sewerage infrastructure, or by other means such as discharge licensing. Although there are good intentions for sustainable development, it is not clear how the policy will be implemented.
Land/Soil	●	The policy includes the protection of soil as a criteria, this may have help in meeting this sustainability objective.

Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	?	Retaining a high quality natural environment is essential in making the County Borough a location where businesses want to locate, and will help provide the workforce with a good quality of life.

Sustainability Summary

Overall, this policy is likely to help in meeting sustainability objectives related to the protection of the natural environment, specifically biodiversity, and landscape. The policy is clear that development will not be permitted where there are adverse impacts on these features, and this is supported in terms of achieving sustainable development as it reduces ambiguity in implementation. For some issues, such as on water and air pollution the policy gives little information on how this will be implemented in making decisions on planning applications.

The monitoring indicator here does not necessarily relate well to the policy, this is more part of the spatial strategy and the control of development outside settlement boundaries, as addressed through SP1.

Main impacts

The impacts of this policy are likely to be positive in terms of environmental sustainability, with potential benefits also for social and economic objectives.

Recommendations and mitigation

- Policy wording could be included on protecting specific features of the landscape of importance for linking habitats, such as ponds, hedges and trees. These features can be part of the wider landscape/townscape and need not necessarily be in nationally or internationally protected sites.
- The connections between bringing natural environment features and areas of open space managed for wildlife and improving local communities could be recognised through policy, with the importance of biodiversity enhancement as part of large development schemes.
- It will be necessary to deliver some aspects of the policy in combination with the other plans and strategies for the area.
- The need for development to consider indirect impacts on the internationally designated sites may be necessary to help protect these assets.

SP5 – Conservation of the built and historic environment		
Policy Summary: This policy aims to prevent new development adversely affecting the built and historic environment, including built development and historic landscapes, parks and gardens.		
Accessibility	-	This policy does not directly relate to this sustainability objective.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	By protecting and enhancing the environment it may be possible to give people greater pride in the place where they live, with possible benefits for wellbeing and avoiding anti-social behaviour.
Community	●	Built environment and landscape features can be essential in maintaining the unique character of communities and attachment people feel to the place where they live. Therefore, protecting, and where necessary enhancing, these features will be important in retaining community character.
Biodiversity	?	Many historic landscape features, including woods, hedges, field barns, and ponds can provide habitats for a diverse range of species. Where historic landscapes are protected and enhanced this therefore should be of benefit to biodiversity, although this will depend on the features being protected.
Landscape	●	Protecting the historic landscape, parks and gardens should help maintain and enhance the character of the landscape.
Built environment	●	This policy should directly help in meeting this sustainability objective.
Air	-	This policy does not directly relate to this sustainability objective.
Climate change	?	Climate change can result in more extreme weather impacting on the integrity of buildings (increased storm events, extended periods of high temperatures), and longer dry periods can dry soil and have impacts on buried archaeology. Therefore it will be important to recognise the potential adverse impacts of a changing climate on the historic environment in policy or supporting text
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	-	This policy does not directly relate to this sustainability objective.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.
Employment	-	This policy does not directly relate to this sustainability objective.

Wealth creation	**?**	Retaining a high quality environment is essential in making the County Borough a location where businesses want to locate, and will help provide the workforce with a good quality of life.

Sustainability Summary

Overall this policy is likely to help in meeting sustainability objectives related to the protection of the built environment. The policy is clear that development will not be permitted where there are adverse impacts on these features, and this is supported in terms of achieving sustainable development as it reduces ambiguity in implementation.

Main impacts

The impacts of this policy are likely to be positive in terms of protecting the quality of the built environment. This can help meeting sustainability objectives relating to the built environment, as well as maintaining a sense of place and peoples' connections to the place where they live.

Recommendations and mitigation

- The policy could refer also to the importance of protecting archaeological resources.
- Policy should also be in place to ensure new development is built to high quality standards to complement existing built heritage features.

SP6 – Minerals supply		
Policy Summary: This policy sets out the objectives for the supply of aggregates and coal in the County Borough over the next 15 years, it also includes the need to safeguard supply using the identified resources in MTAN1 and draft MTAN2.		
Accessibility	**-**	This policy does not directly relate to this sustainability objective.
Housing	**?**	There is the risk that safeguarding of land means that housing cannot be delivered in the locations where there is an identified need.
Health, safety and security	**-**	This policy does not directly relate to this sustainability objective.
Community	**-**	This policy does not directly relate to this sustainability objective.
Biodiversity	**?**	Depending on the location of the safeguarded land this policy could help also in protecting the nature conservation value of this site. However, this safeguarding would be under the expectation that the mineral is eventually extracted therefore this would not be long term protection. Also, there is the risk that safeguarding land can deflect development to areas that are more sensitive in terms of nature conservation value. Some sites for mineral abstraction are very close to SACs, and on additional land that is necessary to protect the integrity of these sites, therefore policy will need to be in place to ensure new workings take direct and indirect impacts fully into account. This will relate to direct land take and the possibility of changes in the water table indirectly impacting on sites. This, or other policies of the plan, should address the issue of marine dredging and the impact this may have on nature conservation. This includes impacts on the internationally designated sites of the Bristol Channel and Severn Estuary, such as the Kenfig SAC.
Landscape	**?**	Depending on the location of the safeguarded land, this policy could help also in protecting the landscape character of the site in the short term. However, this safeguarding would be under the expectation that the mineral is eventually extracted therefore this would not be long term protection. Also, there is the risk that safeguarding land can deflect development to areas that are more sensitive in terms of landscape character.
Built environment	**-**	This policy does not directly relate to this sustainability objective.
Air	**-**	This policy does not directly relate to this sustainability objective.
Climate change	**-**	This policy does not directly relate to this sustainability objective.

Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	?	This policy places restrictions on the use of some land, there is the risk that safeguarding land can deflect development to areas that have higher quality soil.
Minerals and waste	●	This policy aims for the more efficient use of mineral resources, through protecting them from sterilisation by inappropriately located development and aiming for their more efficient use by prioritising use of secondary aggregates.
Renewable energy	?	This policy does not directly relate to renewable energy generation, and includes provision for extraction of a non-renewable energy resource: coal.
Employment	●	Maintaining mineral supplies may give employment opportunities in the future.
Wealth creation	●	Mineral resources in the County Borough are an important economic asset.

Sustainability Summary

Protecting existing aggregate and coal resources is essential to ensure these minerals supplies are not wasted simply through inappropriately located development. There is no truly sustainable way to use primary resources, as they are finite. However, seeking to control their extraction by making use of secondary resources in preference to primary is essential, for making best use of this resource.

The policy could contain greater detail on how it will promote the use of alternative materials, secondary aggregates and efficient use of aggregates, or the tests that will be applied to verify this.

Safeguarding land could have an impact on other sustainability objectives as it may prevent development coming forward in sustainably accessible locations, for example sites on the edge of urban areas that could contribute to housing and employment.

The policy is not clear on how planning applications for sand and gravel dredging from the Bristol Channel will be dealt with. There is the potential for dredging to have serious deleterious impact on the nature conservation value of sites in and around the Bristol Channel and Severn Estuary.

Main impacts

The impacts of this type of policy in terms of sustainability are difficult to identify with certainty, as they encourage the eventual use of a finite resource, albeit aiming for it most efficient use. Therefore, there will be impacts on maintaining the stock of minerals. There may be impacts of protecting land for minerals abstraction, that could potentially be sites that are well suited to other types of development, such as accessible housing and employment.

There may also be nature conservation impacts depending on the issue of how marine dredged sand and gravel is handled.

Recommendations and mitigation

- Overall improvements to policy wording so it is clear how it will be used to test the suitability of minerals proposals – or development that may impact on minerals resources
- More clear policy wording on the tests that will be applied to ensure that alternatives and secondary materials are used in preference to

primary extraction, as well as how the efficient use of aggregates has been sought
- The policy should clarify marine dredging policy and control of this to protect nature conservation areas in and around the Bristol Channel and Severn Estuary, including the Kenfig SAC in the County Borough.
- New minerals development must take into account direct and indirect impacts of operations on SAC sites, with will include the need to protect sites beyond SAC boundaries necessary for maintaining their integrity

SP7 – Minerals protection		
Policy Summary:		
This policy continues SP6 adding detail to the approach that will be taken in safeguarding coal resources as well as protecting residential amenity from existing sites. The policy is not promoting the development of open-cast coal workings nor presuming the suitability of such workings. However, it is protecting land for this use should the resources be needed in the future. Therefore, there is the medium to long-term prospects of new coal mining.		
Accessibility	-	This policy does not directly relate to this sustainability objective.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	This policy should help to protect the health of residents by ensuring there is a buffer zone between built development and mineral workings. Depending on the scale of any future coal mining operation there is potential for adverse impacts to health, particularly if open-cast mines dominate the landscape near some communities.
Community	-	This policy does not directly relate to this sustainability objective.
Biodiversity	?	This policy does not directly relate to this sustainability objective, although if mineral development does proceed there will be impacts on biodiversity, the scale of which will depend on site characteristics. Particular risks are in relation to the development of open-cast mining impacting direct and indirectly on nearby SAC sites.
Landscape	?	This policy does not directly relate to this sustainability objective, although there will be long-term impacts of mineral development on landscape if development does proceed.
Built environment	-	This policy does not directly relate to this sustainability objective.
Air	?	This policy does not directly relate to this sustainability objective, although depending on site management future open-cast mines have the potential to reduce air quality, including through increased traffic movements.
Climate change	-	This policy does not directly relate to this climate change adaptation sustainability objective.
Water	?	This policy does not directly relate to this sustainability objective, however if mining does occur in the future it will need to appropriately managed to avoid water quality, and potentially quantity impacts.
Land/Soil	?	This policy does not directly relate to this sustainability objective, however if mining does occur in the future it will need to appropriately managed to protect the topsoil for future use and site restoration.
Minerals and waste	?	This policy protects coal resources from inappropriate development that would sterilise the resource. This allows for these resources to be safeguarded.
Renewable energy	x	This policy relates to coal extraction for use as an energy fuel. This does not support objectives of increasing energy generation from renewable resources.
Employment	●	New coal mines in the County Borough would provide new jobs.

Wealth creation	●	Mineral resources in the County Borough are an important economic asset.

Sustainability Summary

The sustainability impacts of this policy are mainly dependent on whether there would actually be any new open-cast coal mining in the County Borough. If this were to be the case there is the potential for adverse impacts on biodiversity, landscape and health, as well as being contrary to renewable energy objectives. However, it is likely that some impacts on natural resources and assets would be controlled through appropriate policy.

There would be economic benefits from new jobs and coal is an important economic resource in the County Borough.

It may be that no new coal mining development occurs in the County Borough, and this policy would help to protect residential amenity through avoiding new built development adjacent to extraction sites.

Main impacts

This policy raises the possibility of impacts on the natural assets and communities of the County Borough should new open-cast coal mines be developed.

Using coal as a fuel is contrary to sustainability objectives relating to encouraging renewable energy generation.

There may be benefits to the economy of the County Borough.

Recommendations and mitigation

- Some changes in policy wording, to make it clear exactly what the policy criteria are trying to achieve, would help its successful implementation, avoid adverse impacts on the natural environment and residential amenity, and safeguard resources
- Policy SP6 and SP7 could be combined
- See recommendations and mitigation for SP6

SP8 – Waste management		
Policy Summary: The policy sets out the specific sites that are preferred for new waste treatment facilities, and the industrial sites which are considered to be suitable for this purpose. The policy also states that a maximum of four sites will be allowed on those sites over the plan period.		
Accessibility	?	Provision of new waste treatment sites should help allow waste to be managed close to it source.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	Locating new waste treatment sites must take into account the proximity to residential development and other sensitive uses. This is to protect residents well-being from potential adverse impacts, such as operational noise, odour and litter.
Community	-	This policy does not directly relate to this sustainability objective.
Biodiversity	?	There is the potential risk to nature conservation from the proposed locations of new waste development. This includes development at Brynmenyn Industrial Estate in Bridgend, near the Blackmill Woodland SAC, and Heol-y-Splott in South Cornelly and Village Farm in Pyle that are near the Cefn Cribwr Grassland and Kenfig SACs. Exact impacts may depend on the type of facility proposed, and could be in terms of air quality or water availability/quality.
Landscape	?	Depending on the type of facility there may be landscape impacts, such as visual impacts of large new buildings.
Built environment	-	These sites will be developed in industrial areas and therefore are unlikely to have impacts on areas of quality built development.
Air	?/●	There is the potential for new waste management sites to have an impact on air quality, although this will depend on management and type. For instance, facilities that involve burning could have polluting emissions and some sites could have odour impacts. Reducing waste to landfill through recycling and re-use can also reduce methane emissions that contribute to climate change.
Climate change	-	This policy does not directly relate to this sustainability objective.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	●	Reducing waste to landfill through recycling and re-use can also reduce land required for landfill.
Minerals and waste	●	This policy should help promote the better management of waste and therefore reduce use of primary materials, helping to protect natural resources.
Renewable energy	?	Final disposal of some waste can include energy recovery, although this is not truly a renewable resource.

Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	-	This policy does not directly relate to this sustainability objective.

Sustainability Summary

The sustainable management of waste is essential to make the best use of natural resources and avoid final disposal to landfill of as much waste as possible. New waste facilities also need to be located near the sources of waste to reduce the need to transport waste long distances. This policy should help promote the better management of waste by locating new facilities in the County Borough. Additional information on the type of facility that is needed could be specified in the policy to help deliver the required treatment. It is also not clear why only four sites are allowed over the plan period, as more may be suitable to provide a range on waste treatment base limits on the overall capacity of these sites. Therefore, sites should be allowed to be developed to meet needs, with environmental protection limits, rather than capping the total number of sites.

Main impacts

There should be benefits of this policy in achieving the more sustainable management of waste, with positive benefits against minerals and waste sustainability objectives, as well as reducing land needed for landfill.

Depending on the type of site and management there is the potential for adverse impacts on air quality, landscape and other environmental assets and resources. This includes possible impacts on the internationally protected nature conservation sites, at Blackmill Woodlands and Kenfig (SACs.).

Recommendations and mitigation

- All such facilities need to have management conditions as part of planning permissions, to ensure they are run in a way that does not harm local amenity, cause adverse impacts on the wellbeing of local people and protect the natural environment, including direct and indirect impacts on internationally designated nature conservation sites.
- Greater justification could be given as to why only four sites in total will be permitted over the plan period, as it would be preferable to base decisions on capacity of meeting demand from the County Borough and other accessible nearby areas.

SP9 – Energy generation and conservation		
Policy Summary: This policy directs new large scale wind energy development to the Strategic Search Ares outlined in TAN8 as refined by the Council. It also states that development will be favoured that will help meet national renewable energy and energy efficiency targets.		
Accessibility	-	This policy does not directly relate to this sustainability objective.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	-	This policy does not directly relate to this sustainability objective.
Community	-	This policy does not directly relate to this sustainability objective.
Biodiversity	-	This policy does not directly relate to this sustainability objective.
Landscape	?	There is the potential for a landscape impact from large scale new wind turbine development, however this can be minimised with proper siting of new schemes.
Built environment	?	Small scale renewable energy technologies in new development can have an impact on the historic and distinctive built environment.
Air	●	Increasing energy generated from renewable sources will reduce emissions associated with the burning of fossil fuels. This will include carbon dioxide, and sulphur and nitrogen oxides, helping to improve air quality both locally and globally.
Climate change	●	Increasing the energy efficiency of new homes can help reduce energy consumption.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	-	This policy does not directly relate to this sustainability objective.
Minerals and waste	●	Generating energy from renewable resources should reduce consumption of fuel minerals.
Renewable energy	●	This policy is focused on renewable energy generation, although there is scope for the requirements of the policy to be more tightly worded to maximise these benefits.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	-	This policy does not directly relate to this sustainability objective.
Sustainability Summary Securing more energy generation from renewable resources is essential in delivering sustainable development, in order to reduce dependence		

on diminishing fossil fuel reserves and to reduce carbon dioxide emissions that contribute to climate change.

However, the policy could be strengthened in order to better deliver more energy efficient development and more on-site energy generation. This could include micro-generation renewable energy technology using ground sources for heat, solar panels for hot water and electricity, and small wind turbines. This could also include energy efficiency technologies such as combined heat and power or community heat and power schemes.

Main impacts

This policy should help to reduce reliance on non-renewable energy sources, essential for sustainable development. However, the policy wording could be improved to secure greater benefits.

There may be some landscape impacts from large scale renewable energy generation from wind power schemes.

Recommendations and mitigation

- Include targets, thresholds and standards for delivering more on-site renewable energy generation, this could include setting Code for Sustainable Home targets, or the proportion of energy use on larger sites that should come from renewable resources.
- Specific reference to the use of micro-renewable technologies for supplying off grid energy for specific schemes
- How larger sites, especially strategic sites, should deliver integrated combined heat and power, particularly where mixed use development can make use of co-location for more efficient energy use.
- The policy states that new development that includes renewable energy generation or energy efficiency 'will be favoured', altering the policy to make it more pro-active may help secure greater benefits for sustainable development.
- The policy could be divided into two, to reflect the different criteria that will need to be considered in determining large scale renewable energy schemes, and the need to address local energy needs and supply in energy efficiency measures and micro-renewables.

SP10 – Employment and the economy		
Policy Summary: This policy sets out the strategic employment sites that will be protected for business, industrial and distribution employment uses. The policy lists the sites, but sets no criteria for judging potential additional sites.		
Accessibility	**?**	These sites have existing connections to the large towns in the County Borough, so maintaining employment in these locations will be beneficial for local residents. However, all these sites are located in the southern part of the County Borough, meaning they are a long way from the Valley Communities and therefore are very unlikely to help meet the employment needs of these communities and others in the northern area.
Housing	**-**	This policy does not directly relate to this sustainability objective.
Health, safety and security	**?**	New employment sites, particularly those including industrial process will have to be managed and licensed in a way that ensures there are no adverse impacts on the wellbeing of local communities. Some of the strategic sites are in locations that already have a large amount of industrial and other business development, it will be necessary to avoid some communities in the County Borough becoming unfairly harmed by the impacts of large scale employment development near their homes.
Community	**?**	Similar to health and wellbeing, it will be important that the scale of employment development does not cause inequitable harm to some communities of the County Borough, that are adjacent to the focus for a large amount of this type of development, both existing and planned.
Biodiversity	**?**	The development of greenfield sites for employment has the potential to have adverse impacts on biodiversity. Therefore, preserving the diversity of species currently found on the site will be important in the design, layout and landscaping. Development in proximity to internationally designated SAC nature conservation sites will need to take into account potential harm to these sites, this includes development at Island Farm in Bridgend and Ty Draw Farm in North Cornelly.
Landscape	**?**	There is the potential for the development of greenfield sites to have an impact on local landscape character. Therefore, this will therefore need to taken into account in the design and layout of new development.
Built environment	**?**	New employment development should be, where possible, of a design to enhance the area. This will be particularly important in office and business park development, or town centre employment.
Air	**?**	The strategic employment sites are on urban periphery areas, and therefore, there is the risk that without high quality viable transport alternatives, this will result in increase car travel with air quality impacts. An increase in distribution businesses in the area may have an inevitable adverse impact on air quality through increased HGVs on the roads, although quick links to the M4 may limit local impacts of town centre congestion.
Climate change	**?**	Some of the strategic sites are near areas at risk of flood, this will need to be taken into account when considering the suitability of sites for development, and to ensure appropriate flood risk prevention is put in place if necessary.
Water	**-**	This policy does not directly relate to this sustainability objective.

Land/Soil	**?**	This policy will require the development of greenfield sites, and therefore incorporates the loss of open land. There is a quantity of large previously developed sites in the County Borough that could accommodate new employment development, however these are not necessarily in the locations needed by new and expanding businesses.
Minerals and waste	**-**	This policy does not directly relate to this sustainability objective.
Renewable energy	**?**	It should be ensured that new employment development on a large scale makes use of renewable energy, preferably through on-site generation, including wind turbines and other sources. Any heat produced as part of industrial processes should not be wasted, and either used for heating on site or by nearby development.
Employment	●	This policy should help deliver new employment, although the strategic sites would not necessarily help meet the needs of the wider workforce of the County Borough given that these are located in the M4 corridor only.
Wealth creation	●	This policy should help in wealth creation.

Sustainability Summary

This policy should help benefit the local economy of Bridgend County Borough, although the strategic sites are focused on the M4 corridor and therefore do not necessarily meet the needs of the wider community. The strategic sites are mainly on greenfield land and therefore their development could have impact on landscape and biodiversity, and may not represent the most efficient use of land. Some communities, particularly to the southeast of Bridgend may be becoming dominated by large industrial parks, care needs to be taken that this does not harm the wellbeing of local residents.

The policy does not refer to the overall land-bank of employment sites that the strategy proposes for development.

It is not clear why sites have been chosen amongst all possible strategic sites. The policy also does not show how decisions will be made on development of employment land on non-strategic sites, including non-allocated sites, to ensure that they are in line with the spatial strategy.

Main impacts

There will be positive impacts on providing jobs for some of the County Borough workforce, such as Bridgend, Pencoed and the Pyle/Kenfig Cornelly area, and for encouraging economic growth.

There may be negative impacts related to developing greenfield land. The strategic employment sites may also not be in locations that support the wider employment needs of the County Borough as are all located on the M4 corridor.

Strategic sites allocated near internationally designated nature conservation site will have to be developed to avoid impacts on the integrity of these sites, specifically the Kenfig SAC and the Cefn Cribwr Grasslands SACs.

Recommendations and mitigation

- Other plan policy should help prevent against biodiversity and landscape impacts of greenfield development, as well as the risks of flood to new development.
- Evidence could be provided in the LDP or supporting documentation of how sites were selected as the preferred strategic employment sites.
- It may be beneficial to give details on the expected role of town centres, particularly in Bridgend, in helping to provide new employment

development. Town centre locations for office development can be the most sustainable choice, as this type of development creates a lot of commuting trips and should be developed in accessible locations to help reduce car travel.

- It would be beneficial to setting a sound spatial strategy to identify the total quantity of employment land that will be delivered in the LDP as policy.
- For large development sites design briefs or masterplans could be developed to indicate what new development would be expected to provide, this could include high quality design, energy provision schemes including renewable or district supplies, non-car access, and biodiversity enhancement.

SP11 – Retailing and Commercial Centres		
Policy Summary:		
The policy sets out where new commercial and retail development will be permitted. It focuses development of this type in town, district and local neighbourhood centres. The policy also sets out the quantity of new retail floorspace that is needed in Bridgend town centre and bulky-goods needs in the southern part of the County Borough.		
Accessibility	●	Promoting retail development in the town centres should help improve accessibility as these are often is the most accessible locations to most people, by walking, cycling and public transport.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	-	This policy does not directly relate to this sustainability objective.
Community	●	Reinforcing the role of the town and village centres as the location for retail and commercial uses can help in meeting regeneration objectives, and retaining functioning village centres is essential in maintaining and enhancing communities by providing the focus for village life.
Biodiversity	-	This policy does not directly relate to this sustainability objective.
Landscape	-	This policy does not directly relate to this sustainability objective.
Built environment	●	There is the opportunity for this policy to directly contribute to achieving improved built environments in town and village centres, through promoting high quality design in new detail development. This may particularly be the case in Bridgend with the large amount of new retail development raising the potential for large scale renewal of parts of central Bridgend.
Air	?	There may be positive benefits in promoting more centralised shopping, as these locations are more likely to be accessible to greater numbers by foot, cycle or public transport. This should help in reducing car use, and associated air quality impacts.
Climate change	-	This policy does not directly relate to this sustainability objective.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	?	Promoting retail and commercial development in existing built up areas is likely to mean the more efficient use of land compared with developing out-of-town greenfield locations.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.

| Employment | ● | Retaining retail jobs in the County Borough is positive in terms of access to employment. |
| Wealth creation | ● | Improving the retail core of the County Borough by making Bridgend a higher ranked retail centre could help retain spending in the area. In addition, new retail development could help improve the image of the area to investors. |

Sustainability Summary

The distribution of retail and commercial development, after housing and employment, is strategically important in delivering more sustainable development. Retail and commercial provision can help deliver a spatial distribution of development that can contribute to sustainability. For instance, through creating central accessible areas that are the focus of a range of services that mean people have to make fewer trips, helping in the regeneration of town centres and providing local services near the places where people live to provide for day-to-day needs.

It appears that, besides continued support of the Bridgend and Waterton Retail Parks, out-of-town shopping centres will not be permitted. This is supported by the SA as these centres do little to contribute to sustainable development. Out-of-town shopping centres often promote car travel, through their location and design. They are not aimed at meeting local needs, and may be tailored to attract visitors from a wide area, this is not positive for sustainable development as it encourages car travel and associated impacts on air quality, health and climate change. Such shopping centres can also have a detrimental impact on the continued viability and regeneration potential of town and village centres by attracting shops and shoppers out of these areas.

This policy approach should help in this by promoting development in town centres, concentrating on improving the retail provision of Bridgend, Porthcawl and Maesteg town centres. More information could be provided in the policy on where additional bulky comparison goods retail floorspace will be provided in the 'south of the County Borough'.

The policy states that new retail and commercial development will be focused in the identified areas, it is not clear whether this type of development if proposed in other locations will be permitted – for instance in association with regeneration initiatives. For example, mixed use developments in Maesteg and other areas could accommodate new retail development and be beneficial in achieving the regeneration needed in these towns.

Main impacts

There are potential positive impacts of this policy on aiding regeneration of town centres, in particular Bridgend where there is an expectation for a large amount of new retail development. Aiming to protect existing district and local centres is also essential in helping to reduce the need to travel and maintaining the heart of communities.

There may be some impacts that cannot be predicted as the exact location of new retail and commercial development is not set out in this policy, such as the location of new allocations and the coverage of centres.

Recommendations and mitigation

- The district and local neighbourhood centres will need to be defined in LDP policy and maps, and the extent of these areas will need to ensure it encompasses all of the retail areas concerned.
- The policy will have to be implemented alongside other policies, or design briefs, to ensure new development is of high design quality and

contributes to sustainable development. This is particularly associated with the large development in Bridgend where schemes need to aid the revitalisation of the town centre, provide development that has good access by non-car modes and which could contribute to low and zero carbon development.

SP12 - Tourism		
Policy Summary:		
This policy supports tourism development in the County Borough. The policy lists the strategic areas where tourism is expected to aid regeneration, including Porthcawl, the Llynfi Valley by means of Cycle Routes, and Bryngarw Country Park and the Garw Valley.		
Accessibility	-	This policy does not directly relate to this sustainability objective.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	The policy does promote strategic tourism schemes related to outdoor recreation, which is positive in meeting this sustainability objective.
Community	?	The economic benefits of increasing tourism and tourism spend in parts of the County Borough could help achieve regeneration benefits for communities in the area. Attracting tourists could be a key to supporting communities in more remote areas, such as the villages.
Biodiversity	?	Adjacent to the built-up area of Porthcawl are areas of high importance for biodiversity, i.e. the Kenfig SAC sites. Therefore, any development in the town will need to ensure this does not adversely impact on the integrity of these sites.
Landscape	?	Development in Porthcawl will need to be designed and located to ensure it does not harm the Heritage Coast.
Built environment	?	New tourism related development will need to be of a high built quality, to protect the high quality natural environment that is the focus for much of the tourism to the area, particularly in the valleys and near the Porthcawl Heritage Coast.
Air	-	This policy does not directly relate to this sustainability objective.
Climate change	-	This policy does not directly relate to this sustainability objective.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	-	This policy does not directly relate to this sustainability objective.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.
Employment	●	Tourism is an important component of the economy of the County Borough and therefore encouraging higher spend tourism will help support new employment opportunities.
Wealth creation	●	Tourism is an important component of the economy of the County Borough and therefore encouraging higher spend tourism will help support wealth creation.

Sustainability Summary

Tourism is an important part of the economy of the County Borough, and there is potential to increase the amount visitors spend when they visit the area through provision of new facilities and more serviced accommodation. Essential to achieving more sustainable tourism is increasing visitor spend per head, rather than simply increasing the number of tourists who spend little in the local area. For example, there needs to be high quality serviced accommodation, more attractions and associated development such as restaurants, shops and cafes. This will help improve wealth creation in the County Borough from tourism but not increase the number of unsustainable car trips.

Tourism also has a role to play in delivering regeneration to areas of high quality natural environment but which lack other employment opportunities. This policy helps define strategic areas that need to be the focus of new tourism initiatives, although this will need to be in conjunction with other plans and strategies. The policy also encourages high quality tourism accommodation and facilities, although does not proactively set out how these can be delivered.

Main impacts

There is the potential for positive impacts related to economic regeneration of areas through tourism. Lack of detail in the policy of how these developments will be delivered means that assessing impacts with any certainty is not possible, and this may also impact on delivery of the policy aims.

Recommendations and mitigation

- Care will need to be taken in promoting tourism-related development in Porthcawl to ensure it does not harm the integrity of the Kenfig SAC, this could be achieved through additional policy protection.
- Care will need to be taken in promoting new tourism development in Porthcawl to protect the landscape character of the Heritage Coast.
- Policy could be developed to ensure that existing tourism development is protected, particularly existing serviced accommodation.
- This policy will need to be implemented in conjunction with other plans and strategies for tourism in the County Borough.

SP13 – Housing		
Policy Summary:		
This policy sets out the overall provision of 8100 new dwellings to be delivered up to 2021 in the County Borough (or around 578 per year from 2007 to 2021). The policy also sets out the strategic sites for housing development, that will help deliver the LDP strategy.		
Accessibility	?	Meeting this objective depends on the location of development, where new housing is proposed near existing employment sites and town centres this will mean good access to jobs and services, without careful public transport planning peripheral development can have adverse impacts.
Housing	●	This policy should help meet this objective, although additional information on how affordable needs will be met could improve this.
Health, safety and security	●	Provision of housing to meet peoples' needs is essential to ensure wellbeing and security.
Community	●	The strategic sites include new housing to be delivered in communities in need of regeneration.
Biodiversity	?	There is likely to be some inevitable impact on biodiversity through the development of 8,100 homes. However, the extent of these impacts can be mitigated against through appropriate policy control. Particular attention will need to be given to any new housing development in proximity to the SAC sites in the County Borough, most importantly in Porthcawl that is surrounded on the coast by sensitive areas, but also Parc Derwen.
Landscape	?	Development on the periphery of towns and villages will need to be determined with a view to avoiding landscape impacts.
Built environment	●	New housing presents the opportunity to enhance the built environment, through high quality design, and on larger sites the potential for carefully design urban layouts, to create high quality living spaces.
Air	?	There may be impacts on air, this may depend on the extent to which it is possible to create more joined up development that reduces the need to travel.
Climate change	?	New housing development will have to be built in a way that allows it to be adaptable to withstand the impacts of a changing climate. This will include the need to ensure new development is not in areas at risk of flood, or will increase the risk of flood elsewhere. New homes will also have to be designed to take into account higher summer temperatures without the need for air conditioning. Development in Porthcawl waterfront will need to include sea defences to take into account rising sea levels.
Water	?	New development will create an additional requirement for sewerage and potable water supply.
Land/Soil	?	Much new development is to be directed to greenfield land, and this may not be the most efficient use of land. However, housing is also to be delivered on previously developed sites. It will also be necessary to ensure appropriate remediation of contaminated land when necessary.
Minerals and waste	?	New development will require provision for the sorting and collection of recyclable waste.

Renewable energy	?	In larger new development sites for either all housing or mixed use, there is the potential to ensure energy is used more efficiently and for the proportion of energy to be generated from renewable resources to be set.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	?	Provision of new housing to meet diverse needs is essential in maintaining a workforce in the County Borough.

Sustainability Summary

Setting out how housing development is to be delivered is one of the key roles of the LDP and the location where this is developed can have a major impact on delivering sustainable development. However, only around a quarter of the total figure of 8100 homes remains to be delivered through the LDP and the strategy that has been developed. Therefore, ensuring this development is directed in a way that helps meet the chosen LDP strategy is essential. The spatial strategy for the LDP includes a clear desire to aid regeneration through the delivery of housing to areas in need in the County Borough. The policy sets out strategic housing development sites to help deliver the strategy, although there is no quantification of expected yield. Including yield for each strategic site, and also the quantification of the overall distribution of housing throughout the County Borough is crucial in delivering a sustainable spatial strategy. Without this information it is difficult to understand how policy will be used to deliver the objectives and vision for the LDP, such as meeting regeneration objectives, and reducing traffic growth by locating new homes near jobs.

There may also be impacts on the natural environment from development of the strategic sites (and the rest of the residual development), through the development of greenfield land. For instance, there could be impacts on biodiversity, landscape and in the efficient use of land. The extent of these impacts cannot be identified from this policy, and it would be useful to see how these four strategic sites were selected.

Main impacts

New housing can clearly help meet the housing need in the County Borough, although some investigation of how affordable needs will be met could aid this.

There are likely to be some impacts on environmental protection through development at this scale. The extent of this cannot be predicted at this stage.

Recommendations and mitigation

- The policy should contain a more detailed breakdown of expected housing yield on each strategic site
- Include in policy a breakdown of the expected housing provision in each sub-area of the County Borough
- As part of the spatial approach to delivering development to meet needs strategic policy should address delivery of affordable housing, for example proportional targets set at variable rates in different parts of the County Borough,
- Whether there is any expectation that housing will be delivered on previously developed land in preference to greenfield sites, could be included as policy
- Density requirements for development should be set as policy to ensure the efficient use of land
- Details of housing in rural areas should be addressed, for example through the use of rural exception sites to deliver rural affordable housing

if necessary
- Detailed policies should be developed for each strategic site, and design briefs or masterplans prepared giving detailed guidance on what the Council will expect from the development of these sites. This could include details of type of housing to be provided (include affordable housing provision), housing density, the design of development, the use of energy in new development, such as renewable energy or community power, transport provision, and biodiversity enhancement.
- Policies to mitigate against the possible impact of this scale of development will also be necessary, i.e. upon biodiversity and landscape protection, and avoiding risk of flood
- It would be useful to see how these sites have been selected out of a range of alternatives sites, as being those most suitable to deliver the strategy and therefore also sustainable development
- Housing growth will need to be implemented alongside other plans and strategies including how increased visitor pressure will be managed on the Kenfig SAC arising from large scale development in Porthcawl.

SP14 – Community uses		
Policy Summary: The aim of the policy is the to provide new community facilities to meet the needs of local communities, this will be achieved through the allocation of land. Existing community facilities will also be protected. Where suitable, areas will be identified as 'community hubs' where community facilities are to be grouped.		
Accessibility	**?**	Providing community facilities to meet local needs is essential in providing equitable access for all. Community hubs could be of major benefit in terms of equitable access with many facilities provided in a single location.
Housing	**-**	This policy does not directly relate to this sustainability objective.
Health, safety and security	●	Provision of community facilities is essential in providing for healthy communities, as this will include public open space and sport facilities as well as healthcare provision.
Community	●	This policy approach is intended to help support communities in a variety of ways, including education, healthcare and leisure services.
Biodiversity	**-**	This policy does not directly relate to this sustainability objective.
Landscape	**-**	This policy does not directly relate to this sustainability objective.
Built environment	●	Provision of community services can help in improving the built environment. This is particularly where it includes new open space and parks that have an important contribution to make to urban living..
Air	**?**	New accessible community facilities, especially as community hubs can help in reducing the number of trips made by car, with positive impacts on air quality.
Climate change	**?**	Provision of new open space is important as part of a changing climate, as summers get warmer it will be necessary to have good outside space provision suitable for informal recreation and leisure.
Water	**-**	This policy does not directly relate to this sustainability objective.
Land/Soil	**-**	This policy does not directly relate to this sustainability objective.
Minerals and waste	**-**	This policy does not directly relate to this sustainability objective.
Renewable energy	**-**	This policy does not directly relate to this sustainability objective.
Employment	**-**	This policy does not directly relate to this sustainability objective.
Wealth creation	**?**	Creating high quality places to live will help enhance the image of the County Borough, encouraging businesses to move to, and stay in the area as they grow.

Sustainability Summary
Having a wide range of community facilities in place to meet the needs of the resident population and workforce is essential in supporting people throughout their lives. Good quality provision can help improve peoples' wellbeing, ranging from good access to education, healthcare, recreational facilities and open space.
Provision of community hubs could be beneficial in the regeneration of areas and supporting local communities and could become a community focus. They should also have the advantage of providing a many facilities in a single location that should help reduce the trips people have to make to meet day-to-day needs, which could help reduce car travel. As community hubs are of strategic importance it would be beneficial to see where these strategic sites will be developed as part of the spatial strategy or key diagram.
It is not clear what evidence the Council is seeking to enable allocations to be made for all of the facilities listed. Furthermore, it may be that the locations in need of change over the plan period and allocations at this time cannot take this into account. Also, even if land is allocated a way must still be found to actually deliver that development, for instance through other strategies and funding, or in some instances through developer conditions and contributions.
Main impacts
If successfully implemented this policy is likely to be of benefit to local communities, including in their health and wellbeing.
Recommendations and mitigation
• To successfully deliver new community facilities in some locations there will be a need for the LDP to be a jointed up approach of the LDP with other plans and strategies
• The policy should include more detail of the location of community hubs

SP15 - Infrastructure		
Policy Summary:		
This policy simply sets out the matters for which legal agreements will be sought to achieve necessary community and infrastructure benefits from development.		
Accessibility	●	Providing the infrastructure to meet the demands created by new development is crucial in providing accessible facilities. This will include agreements on provision of education facilities, public transport and community facilities.
Housing	●	This policy includes agreements to secure affordable housing.
Health, safety and security	●	Infrastructure agreements will be negotiated on sports and open space, education and community facilities, all of which are necessary in improving wellbeing.
Community	●	Legal agreements can help secure a variety of benefits for the communities, from open space to climate change adaptation.
Biodiversity	●	The policy includes protection, enhancement and management of the natural environment as a matter that can be covered by legal agreement.
Landscape	●	The policy includes protection, enhancement and management of the natural environment as a matter that can be covered by legal agreement.
Built environment	●	The policy includes protection, enhancement and management of the historic and built environment as a matter that can be covered by legal agreement.
Air	?	Policy include public transport improvements as part of legal agreements, and it is hoped that this can help reduce car use and therefore air quality impacts.
Climate change	●	Climate change adaptation is a matter on which legal agreement can be sought, although it does not include any details of what this might be.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	-	This policy does not directly relate to this sustainability objective.
Minerals and waste	?	The policy includes the need to make provision for waste management and recycling facilities, although there are no details as to the extent of this provision.
Renewable energy	●	The policy includes climate change mitigation as one of the considerations for legal agreements, and this should be backed by policy on specific schemes to deliver more efficient energy use or the generation of renewable energy.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	-	This policy does not directly relate to this sustainability objective.

Sustainability Summary
Using legal agreements as well as conditions can help deliver development that can mitigate against the potential adverse impacts it may create. Such as, to meet the needs of future residents through improved capacity and availability of educational facilities and providing new open space, and reduce impacts on the environment through environmental enhancement and reducing energy demand.
The policy does not address water infrastructure issues and it may be suitable to seek agreements relating to the infrastructure requirements for the treatment of waste water, or related to reducing flood impacts through sustainability drainage systems. Similarly for soil there could be agreements on land reclamation and decontamination as part of policy provisions.
Main impacts
This policy is likely to have positive sustainability impacts relating to improving the quality of development.
Recommendations and mitigation
- Where legal agreements are to be negotiated these will need to be backed up by policy requirements, including meeting specific thresholds and targets for issues such as affordable housing and reducing energy demand.   - Policy should set out the phasing of delivery of these infrastructure elements, as in many instances it will be necessary for these to be place prior to the completion of development. This not only relates to utilities infrastructure, but also to those measures which will contribute towards sustainable communities and sustainable travel.