

BRIDGEND COUNTY  
BOROUGH COUNCIL

**Sustainability Appraisal of  
the Bridgend Local  
Development Plan**

Scoping Report

December 2006



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## **1 Introduction**

- 1.1 This document is the 'Scoping Report' for the Sustainability Appraisal (SA), which incorporates the Strategic Environmental Assessment (SEA), for the Bridgend Local Development Plan (LDP or the Plan). It has been prepared by consultants Baker Associates to assist Bridgend County Borough Council in meeting the requirements of SA and SEA.
- 1.2 The SEA Directive was incorporated into UK law in July 2004. The Directive applies to a range of plans and programmes, including Local Development Plans. The main aim of the SEA process is to contribute to the integration of environmental considerations into the preparation of the LDP to promote more sustainable development. This is achieved by highlighting the potential environmental impacts of the proposed plan as it emerges in order that these can be avoided, or mitigated against, as necessary. To some extent SEA extends the principles of Environmental Impact Assessment to the strategic level, taking into account the more strategic nature of the decisions being made. For the Bridgend LDP the SEA is incorporated into the Sustainability Appraisal (SA) process as a single process, referred to in this report simply as SA.
- 1.3 There are differences between the SEA and SA requirements, with the most significant that SA should deal with all aspects of sustainability (environment, natural resources, economy and social aspects), while SEA is concerned predominantly with the environment and has a statutory position in law.
- 1.4 There are specific reporting and process requirements for SEA prescribed by legislation and set out in Regulations, whereas there is only good practice advice for SA. For simplicity this combined approach is referred to as an SA as this is the guidance that has been adopted for this type of appraisal across Wales and England, including the Conservation (Natural Habitats) Regulations, 2006. The most appropriate and efficient approach to appraisal is to combine the requirements of SEA and SA in to a single process, and this is what will be carried out for the SA of the Bridgend LDP.
- 1.5 It is the intention for this SA of the Bridgend LDP to be part of the preparation of the LDP from the outset and continue throughout the plan-making process, to ensure that every stage of LDP production is subject to SA.
- 1.6 The approach taken in this appraisal is to create a set of sustainability objectives that show what sustainable development means for Bridgend County Borough in order to test the emerging LDP. The term sustainability encompasses economic and social sustainability, but the majority of objectives relate to the natural resource and environment protection and enhancement, reflecting the SEA process. This is similar to the approach used in the SA of the adopted UDP, but within the context of the new LDP consideration has to be given to the requirements of SEA.
- 1.7 As part of deciding on appraisal sustainability objectives for this SA, account will be taken of the existing baseline character of the area and what this means for sustainable development in Bridgend. It will also be necessary to ensure that the objectives of other relevant plans and strategies for the Bridgend area are taken into account.

- 1.8 A requirement of the SEA Regulations is the preparation of an environmental report detailing the SEA process, and this is required (at para.12(2) of the SEA Regulations) to:

*'identify, describe and evaluate the likely significant effects on the environment of:*

*(a) implementing the plan or programme*

*(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.'*

- 1.9 The first stage of preparing the scoping report, completed in May 2006, allowed relevant bodies an early input into the SA in order to ensure agreement is reached on the appropriate methodology and approach for the study. A number of statutory and voluntary organisations responded as well as a number of interested individuals and elected local councillors. A summary of these comments can be found in Appendix 3 and the alterations which arose are summarised in Appendix 3.

- 1.10 The information contained within the revised version sets out a general picture of what the key sustainability issues are in the County Borough and how the appraisal will take these into account. The scoping report:

- provides information on the approach that is to be taken, including explanation of the relationship between the full SA and what has to be done to meet the requirements of the SEA Directive
- sets out information on the baseline for the LDP area, and wider area where necessary, and indicates what impact the Plan may have on this baseline and key sustainability issues
- sets out suggested objectives for the SA
- suggests what is required at this stage from the consultation bodies.

- 1.11 The bodies consulted as part of this consultation were asked to respond on whether the scoping report has identified the most significant sustainability issues in the area, and where relevant, to assist by providing or signposting any other information that may be of use in identifying the potential significant environmental impacts of the LDP. The consultees were also asked to say whether they believed the approach set out for the SA of the LDP is appropriate.

### **The LDP Process**

- 1.12 Work has commenced on the Bridgend LDP following the adoption of the Unitary Development Plan in May 2005, that is the current development plan covering the County Borough area. However, work on the LDP has begun under the requirements of the new planning system in Wales under the Planning and Compulsory Purchase Act 2004. Undertaking a sustainability appraisal of the emerging LDP is a requirement of this Act, and the Regulations that implement the Act in Wales, and SEA is a requirement of LDPs under its own Regulations.

- 1.13 A Timetable and Community Involvement Scheme (CIS) for the preparation of the Bridgend LDP has been prepared, although formal preparation of the LDP commenced on the 7 December 2005, and a Draft Delivery Agreement was submitted to the Welsh Assembly Government on the 8th October 2006. The Welsh Assembly Government Confirmed its agreement to the Delivery Agreement in its submitted form on the 6<sup>th</sup> November 2006.
- 1.14 Throughout the process of LDP preparation, successive stages will be subject to SA. This is in order to ensure that where decisions have to be made on the selection of alternative approaches to development in the Plan area, setting objectives, creating policies and allocating proposals, these are based on a good understanding of the implications for sustainability and with regard to SEA, specifically environmental protection.

## **2 Proposed approach to the sustainability appraisal**

### **Introduction**

- 2.1 This section of the report sets out a methodology for SA of the LDP.
- 2.2 The methodology can be summarised as an appraisal of the strategy, proposals and policies of the LDP in order to assess the likely impact they will have with regard to protecting the environment and achieving more sustainable development.
- 2.3 Delivering sustainable development is one of the key themes of the Welsh Assembly Government (WAG), and the Planning and Compulsory Purchase Act 2004 makes clear that that all LDPs must be subject to sustainability appraisal. This can therefore help to ensure that LDPs play their role in helping to deliver sustainable development as part of the WAG objective. The 2004 Act also makes the completion of such an SA one of the tests of soundness required of the LDP at Independent Examination, that has to be demonstrated before a LDP can be adopted. The need for SA is reiterated in 'Local Development Plans Wales'<sup>1</sup>, which makes clear reference to SA includes meeting the requirements of SEA, and advocates an integrated approach to the two processes.
- 2.4 The approach to SA of LDPs is not yet covered by specific guidance from WAG. There is current guidance on the SA of UDPs produced by WAG in 2002, although this does not cover the full requirements of SEA. More recently WAG produced an interim guidance note on how to retrospectively incorporate the requirements of SEA into the preparation of UDPs, building on the advice given in the earlier SA guide. There are also a number of generic guides on SEA, and most relevant is "A Practical Guide to the Strategic Environmental Assessment Directive" (2005) produced by ODPM in conjunction with WAG, amongst others. However, this guide is generic to SEA of all types of plan and programme and not simply LDPs. The approach to the SA taken here takes into account these sources of guidance, and will be in compliance with the SEA Directives as well as the SA requirements from planning legislation.

### **Sustainability appraisal of the emerging LDP**

- 2.5 The approach that will be taken to this sustainability appraisal of the emerging LDP will vary depending on the stage reached in the LDP preparation. However, each appraisal stage will draw on the definition of sustainable development as set out in the sustainability objectives developed specifically for the SA process.
- 2.6 This scoping report is the first stage of the SA process, and does not directly reflect any of the emerging work on the LDP. However, this SA process can build on an understanding of the area developed during the sustainability appraisal of the adopted UDP, which was also undertaken by Baker Associates.

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<sup>1</sup> 'Local Development Plans Wales', WAG 2005 p14, para. 3.5

- 2.7 The SEA Regulations require that the relative environmental performance of a set of 'reasonable' alternatives for the LDP must be considered. The appraisal of alternatives for the LDP will be based on those alternatives that are put forward for consideration as part of the emerging LDP. This process will consider the relative sustainability implications of implementing the various alternatives, in order to identify to the plan makers which will be most suitable in terms of seeking more sustainable development and protection of the environment. Where the SA identifies that other alternatives, in addition to those identified in the LDP, may be preferential in terms of sustainability these will be identified as part of the SA process. The consideration of alternatives will also be carried out, where appropriate, on the different parts of the LDP. This means initial consideration will be given to the strategic spatial approach for development and levels of growth directed at the County Borough, to ensure the sustainability implications of this are fully understood. This will be followed by consideration of alternatives at a policy and site allocation level as appropriate.
- 2.8 The alternatives for consideration at this stage should be appropriate for their purpose, taking into account that alternatives should be:
- **reasonable**, in that they are plausible alternatives which could be adopted and they are realistic in that they could be implemented i.e. within the ability of the plan, they also do not contradict national policy and are at the appropriate level of decision making
  - **related** to the objectives of the plan, in that they are relevant to the aims and objectives of a spatial plan and within the control of the plan as statutory land use policy
  - related to the **geographical scope** of the plan as they relate to the distribution of development across the whole of the County Borough and only relate to the distribution of development within it.
- 2.9 It will be especially important to consider the alternatives to the overall spatial strategy for development in the County Borough, in order to ensure various types of development are located so as to help reduce the need to travel. Alternatives that could be considered include:
- the overall scale of development to be provided for
  - the location of development, essentially through the use of different permutations of available land and development opportunities
  - the mix of uses in any location and also the density of development (and hence the amount of land taken for development).
- 2.10 Once the more detailed policies of the LDP have been developed by the LDP preparation team, these can be subject to SA using a matrix based approach in which the policies can be compared to the sustainability objectives in order to predict the potential impact on sustainable development. This will help to ensure that the sustainability implications of these policies are understood by those preparing policy, so amendments and additions can be made as appropriate to improve their performance, and help achieve more sustainable development. The appraisal matrices will be accompanied by a written

commentary on the overall likely performance of the plan in guiding development to achieve more sustainable outcomes, which is the primary aim of any LDP.

- 2.11 Other parts of the LDP will also be subject to appraisal at this stage, including the proposals. The SA will also consider the general sustainability issues relating to key proposals and site allocations, however it is not the role of the appraisal to consider in depth specific constraints on all potential sites. It will be the responsibility of the local planning authority to check these are in keeping with sustainable development objectives. It may be suitable for the SA to verify the methods used by the planning authority in selecting sites, and whether this is likely to give rise to sustainable decisions.

### **Appropriate assessment**

- 2.12 It is a requirement of the Habitats Directive<sup>2</sup> that plans and proposals that may have an impact on sites designated under this Directive undergo an 'appropriate assessment'. The purpose of which is to identify if there would be significant adverse effects on these sites from the type of development proposed. Where adverse effects are identified as likely this will prompt the need to consider whether there are alternatives solutions, and/or appropriate mitigation and compensation.
- 2.13 In Bridgend County Borough there are three sites that are designated at a European level for their importance for nature conservation under the Habitats Directive. These are the Special Areas of Conservation at Blackmill Woodlands, Cefn Cribwr Grasslands and Kenfig Burrows (and Merthyr Mawr Warren). All these sites are well away from existing built-up areas in the County Borough, and therefore the LDP is unlikely to have any effect on these areas. At this stage in the preparation of the LDP neither the spatial strategy nor any proposals for development have been finalised. Therefore although it is unlikely that the LDP will have an impact on these sites, as they are well away from existing developed areas, the emerging LDP should be re-assessed at a later stage to verify the location of proposed development and therefore the likelihood of impacts, and whether this would prompt the need for 'appropriate assessment'. Where it is identified that effects, alone or in combination are likely, full appropriate assessment will be undertaken, in line with guidance.

### **Reporting**

- 2.14 A sustainability report will be produced and will be available for consultation at the Deposit stage of the LDP. This report will detail the SA process from the start and through its pre-submission stages. This report will have to meet the detailed assessment and reporting requirements of the SEA Regulations (Schedule 2), with additional material to cover the full sustainability agenda. The report will therefore include:
- a full description of the sustainability baseline, and how the development plan can have an impact on this

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<sup>2</sup> *European Council Directive (92/43/EEC) on the Conservation of natural habitats and of wild fauna and flora implementing in England and Wales under The Conservation (Natural Habitats, &c.) Regulations 1994 (SI2716)*



- identification of other plans and programmes, objectives and strategies that would have relevance to the SEA of the LDP
  - an assessment of the relative sustainability effects of any alternatives and options for development that were considered earlier in LDP preparation, particularly strategic options relating to the level and distribution of development in the County Borough
  - assessment of the LDP strategy, policies and to some extent proposals using the sustainability objectives (incorporating SEA)
  - identification of any significant impacts the LDP may have on sustainability, and where possible ways of mitigating for these
  - discussion of monitoring arrangements for the SA
- 2.15 Similarly, reports will accompany the earlier consultation stages of the Bridgend LDP, when the public can comment on the SA process and 'appropriate assessment' where relevant. The outcomes of this earlier consultation will be incorporated into the Report which accompanies the Deposit LDP and will refer to any changes made to the Plan arising through that consultation.
- 2.16 All of the stages referred to above, at which SA takes place during plan preparation, are clearly set out in the Delivery Agreement for the LDP.

### **3 Baseline sustainability characterisation of Bridgend**

#### **3.1 Introduction**

- 3.1.1 The collection of baseline data is essential when considering the impacts that the LDP is likely to have on the existing situation in the County Borough and is a requirement of the SEA regulations.
- 3.1.2 This section is a collection of key information relating to the existing character of the County Borough. It covers matters relating to population, social, economic characteristics and infrastructure, as well as the natural environment and natural resources. The requirement for information collection comes from the SEA Regulations, which define certain environmental matters that much be addressed in the baseline section. However, as this appraisal process has been widened to include the full sustainability agenda, information has also been collected on social and economic issues, in addition to the environmental issues. The baseline information collection exercise is not 'set in stone' and will differ from other similar exercises depending on available data and local conditions. The baseline can be adjusted or amended by new details made available during the production of the various component parts of the SA, and the results of the scoping exercise.
- 3.1.3 Data was collated from a variety of existing sources, as indicated in the report text and footnotes. Appendix 1 refers to the key sources of data, both online database sources, and various reports from national to local levels used in this Report.
- 3.1.4 The requirement for a collection of baseline data arises from Schedule 2 of the SEA Regulations The purpose is to identify:
- 'relative aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme'*
- 3.1.5 For this application of SA/SEA to a LDP it is important to be practical on the quantity and detail of the information that should be collected. The balance needs to be reached that allows sufficient detail to provide an understanding of the existing sustainability issues to act as a basis for appraisal, without making the task unnecessarily onerous and the collection of material not relevant to the LDP or Plan area. Therefore it is the aim for this exercise to not be a fully quantified statement of every issue in the Plan area and beyond, but a useful summary of the key issues within the area. As a part of this, information collected should reflect the requirements of the SEA Directive that asks for consideration of the following:

- Landscape
- Flora, fauna, biodiversity
- Climate change
- Human health
- Water
- Soil
- Population
- Air

- Cultural heritage
- Material assets (waste and minerals)

Economic and social matters are also addressed here to widen the agenda to include the full range of sustainability issues, as referred to above.

- 3.1.6 Data and information availability varies between topics, and the extent to which it can be made specific to the Plan area. The SEA Regulations require that only information that can 'reasonably be required' needs to be included in the report. This is taking into account 'current knowledge and methods of assessment' (12.3). Therefore, no new data gathering was carried out for the SEA scoping report, data was compiled from various existing sources. During the plan preparation process, where new information becomes available, it may be possible to add this, in particular map-based data.
- 3.1.7 The review takes the main sustainability features in the Plan area, gives concise details of what the situation is now, and where possible makes predictions about the changes to the environmental baseline in the future. However in considering the baseline it must be remembered that the LDP can not influence all facets of sustainability. With much desired change lying beyond the scope of a development plan, it would therefore be inappropriate and misleading to dwell on these matters in this process. An example, of this could be changing agricultural land use which despite having a huge impact on the landscape and wildlife is almost entirely beyond the influence of the LDP. Other key matters that are beyond the scope of influence of the LDP involve the day-to-day behaviour of people. For example, the amount they use a car or where they choose to live or work, although the LDP can ensure that choices are available for people to change their behaviour if they so choose.

## **3.2 Environment and Natural Resource Issues**

### **Landscape Character**

- 3.2.1 The adopted Unitary Development Plan for Bridgend describes countryside as 'that area of land lying outside the designated settlement boundaries'. Within Bridgend County Borough this covers an area of varied landscape ranging from the exposed tops of the coalfield plateau, through upland and lowland valley landscapes and coastal plateau which includes coastal dunes, to the Glamorgan Heritage coastline. This is interspersed with woodlands, moorlands and river valleys and constitutes a rich natural and semi-natural environment.
- 3.2.2 It is important to note the role of agriculture in shaping the Bridgend countryside, although development planning has little influence over this. Approximately 44% of the land area of Bridgend is in agricultural production in 2004<sup>3</sup> (although this does not include common land). This is much less than the 80% figure for Wales as a whole. Nevertheless agricultural land makes an important contribution in terms of landscape. The majority of this agricultural land, around 90% (over 10,000ha), is grassland for sheep farming, with over 71,000 sheep recorded in the agricultural census in 2004. With only just over 4% of this agricultural land used for arable crops (506ha), the majority of which are barley.

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<sup>3</sup> Agricultural Small Area Statistics WAG (2004)

- 3.2.3 The Glamorgan Heritage Coastline is the only nationally designated landscape in the County Borough based on scenic beauty alone. The preservation and enhancement of the undeveloped natural beauty should be the main objective in such areas. The coastal zone of the entire County Borough should also be protected or enhanced as necessary and this may include views to and from the coastal area from the rest of the County Borough.
- 3.2.4 In addition, the adopted UDP designates 'Special Landscape Areas' in the County Borough, the first of which forms part of a wider 'Strategic Coalfield Plateau and its Associated Valley Sides' across South East Wales, while the remainder comprises more local 'Landscape Conservation Area's (LCAs). The adopted UDP designates 19 LCAs for reasons of scenic and amenity value on a County Borough level. The designated LCAs cover some 3,137 hectares, or 12.3% of the County Borough, and although designated in the UDP, originate in the main from the previously adopted Local Plan covering the area. The UDP re-examined the previous assessments of the countryside of the County Borough upon which those designations were based, and took into account more recent landscape assessments and surveys undertaken since they were formerly adopted i.e. *The Landscapes Working for Bridgend County Borough Strategy*, together with assessments undertaken for its *Countryside Strategy* (approved 1998) and *Integrated Action Programme* (under review 1999), and the approved *Local Biodiversity Action Plan*. This led to the designation of three new Landscape Conservations Areas (LCAs) and the amendment of an existing LCA in the UDP.
- 3.2.5 There are many elements that make up the distinctive landscapes of the County Borough, and key features to consider are:
- dark night skies and the impacts of light pollution
  - traditional field systems
  - woodland and trees
  - urbanisation of rural areas
  - tranquillity
  - urban fringe areas
- 3.2.6 Characterisation of the landscape of the Bridgend area is based on a pre 2003 version of the LANDMAP approach. At present this means that the LANDMAP coverage of the area is based on only four layers, although the visual and sensory layer is currently under preparation. It will be important to consider this information when it is made available in preparing the LDP, and in the SA process.
- 3.2.7 As an important component of the landscape, an agriculture resource, a fundamental part of the historic landscape and a public amenity Common Land within the County Borough should be considered and protected from development. Further information on historic landscapes in the County Borough is shown in the Historic Environment section.
- 3.2.8 There are 3,033ha. of registered Common Land in the County Borough (which has an area of 25,500ha.) This represents approximately 12% of the area of the County Borough.

***Implications for the Plan:***

- 3.2.9 The landscape quality of the County Borough should be maintained and where possible enhanced through the LDP. Features in the landscape that have been identified as part of LANDMAP characterisation, and other processes, that contribute to the distinctive local character should be protected wherever they appear.
- 3.2.10 A high level of protection should also be afforded to all the areas identified as having unique landscape quality, in particularly those designated 'Special Landscape Areas', which include 'Landscape Conservation Areas'.

**Biodiversity**

- 3.2.11 In 2002 the Local Biodiversity Action Plan (LBAP) was prepared for Bridgend County Borough on behalf of the Bridgend Biodiversity Partnership. The approved LBAP was adopted by Bridgend County Borough Council as Supplementary Planning Guidance "to run alongside and inform" the Bridgend UDP on the 5<sup>th</sup> June 2002. The document contains a number of species and habitat specific action plans, setting out the approach that should be taken to conserving UK priority habitats that are present in the County Borough. The LBAP also serves to detail the key areas of biodiversity importance in the area.
- 3.2.12 Three named sites of international / European nature conservation importance within the County Borough receive statutory protection for their international wildlife conservation interest. All three of these are Special Conservation Areas (SAC), designated under the EC Habitats and Species Directive. The SACs are the Kenfig Burrows (and Merthyr Mawr Warren) SAC (coastal dune systems), Cefn Cribwr Grasslands SAC and Blackmill Woodlands SAC.
- 3.2.13 Although these are three named areas in fact they are spread around multiple smaller patches of these habitats, the majority of which are found in the coastal and more southern areas of the County Borough. These are shown in map 3.2. These sites are identified as Natura 2000 sites following European designation, and their protection is covered by European law. This means where a plan or proposed development may harm these an 'appropriate assessment' must be carried out under article 6 of the Habitats Directive. Where negative impacts are identified the plan or proposal can only proceed subject to a number of requirements, including that development is necessary for overriding reasons of public interest and no alternative sites are available.
- 3.2.14 In the case of the Bridgend LDP it is unlikely that the plan will have an impact on these sites, as they are far outside existing built-up areas and in locations identified as countryside, therefore there are strict controls restricting development in these areas. However, appropriate screening for the need for appropriate assessment will need to be carried out for the emerging LDP to test whether a full appropriate assessment will be required. This will be based on the strategy, policies and proposals of the LDP, and its cumulative impacts with the implementation of other plans and programmes. Additional material on these sites and possible impacts will be reported in future SA reporting stages, where the appropriate assessment matters will be covered in a separate section than other SA matters.

3.2.15 These three internationally designated sites are also covered by the national 'Sites of Special Scientific Interest' designation, and this designation also covers a number of other sites in the County Borough, as shown in map 3.1.

The nationally designated sites of nature conservation are:

- twelve Sites of Special Scientific Interest (SSSIs), which include Kenfig SSSI and Merthyr Mawr SSSI that form part of the Kenfig SAC and which are also National Nature Reserves
- other SSSIs include ancient oak woodland, mixed ancient woodland with rich ground flora, wet meadows on peaty soil, valley and upland blanket mire, deep rocky chasms with mosses and ferns, large sand dune systems and geological features

In addition, there are locally designated important sites, namely: *Local Nature Reserves* (LNRs), designated in respect of their habitats.

Statutory designated sites cover 1,215 hectares or 4.8% of the County Borough's land-area, which includes the 974 hectares of the Kenfig SAC. Excluding the sand dune areas, the figure for the protected area reduces markedly to just less than 1% of the County Borough's land-area.

3.2.16 Over 160 non-statutory Sites of Nature Conservation Importance (SINCs) have been identified in the County Borough. These areas have recently been validated, and are now added as a layer to the County Borough Council's Geographic Information System database which is used for development planning and development control purposes. In addition, sites may be adopted or designated as nature reserves by voluntary and private sector bodies such as the county wildlife trusts, Butterfly Conservation and the Woodland Trust. The habitat types identified in the LBAP are also of importance to the County Borough, and the recommendations put forward in that document need to be taken into account by LDP policies.

3.2.17 Bridgend County Borough is rich in a wide range of species due to the area's geographical variation, and the wide range of habitats it contains; in particular, its internationally important sand dune systems. The variety of coastal habitats, which include small areas of saltmarsh, sandy beaches and rocky shoreline, supports a number of species that cannot be found in inland areas. An example is the Strandline Beetle (*Eurynebria complanata*), which at Kenfig is present in one of its most northerly stations in Britain. The Merthyr Mawr and Kenfig sand dune systems are a special case. These constitute some of the best dune areas in Wales, and are rich in fungi, bryophytes, vascular plants, invertebrates and vertebrates. Some species are found in very few other places in Britain, such as the Fen Orchid (*Liparis loeselii*) and the Shrill Carder Bee (*Bombus sylvarum*).

3.2.18 The threats to the wildlife resource, identified in the LBAP, have in the last 100 years been mainly from the gradual attrition caused by built development, including roads, houses and industry. Commercial afforestation and agriculture have also had a direct impact.

3.2.19 Built development impacts include their direct impacts as well as secondary effects including habitat fragmentation which leads to the gradual decline in species diversity on these sites, increased water abstraction, loss of buffer

zones and increased pressure from recreation. Species are also affected by built development, as obviously they require their habitats to be protected in order to survive. They are particularly affected by habitat fragmentation, for example habitat patches are often now too small and fragmented to support Marsh Fritillary butterflies.

- 3.2.20 Other species are affected by pollution, particularly in freshwater habitats, human disturbance, particularly wading birds that nest on the ground. Dewatering via mineral workings can also have an adverse impact on biodiversity and habitats that are reliant on river flows or high water tables. Appendix 2 lists habitats identified in the LBAP, and any potential threat to that habitat identified in the LBAP over which the LDP may have an influence.

***Implications for the plan:***

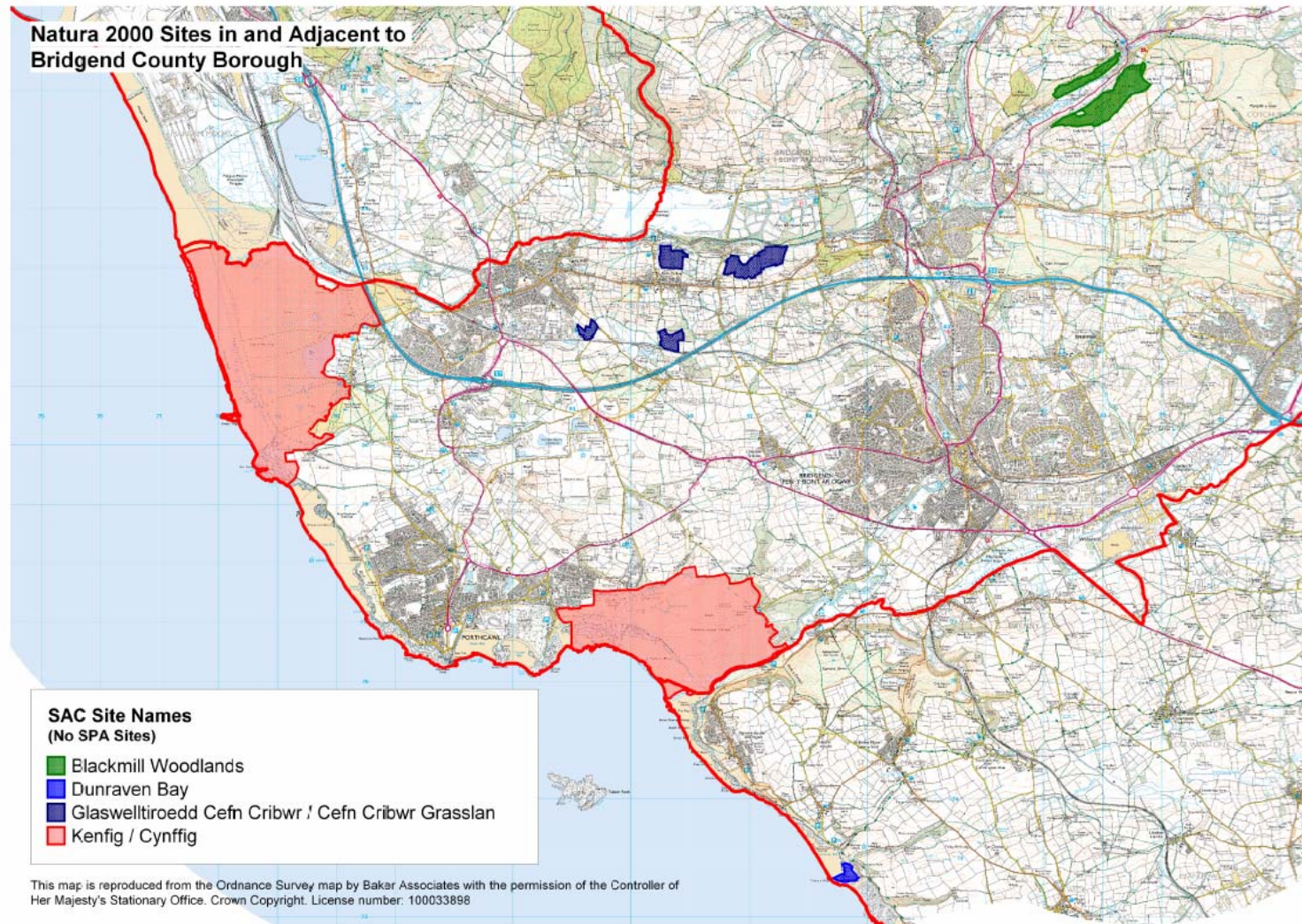
- 3.2.21 The need for new development in the County Borough continues and has to be accommodated through appropriate policies and proposals in the LDP. Notwithstanding this requirement the quality of the environment must also be maintained. For development to be sustainable in terms of biodiversity, it needs to be well planned and controlled.
- 3.2.22 The LDP for Bridgend County Borough, if it is to assist in maintaining and enhancing biodiversity at the local level, should be based on detailed audits of the nature conservation resource and the capacity of the area concerned to accommodate development. The LDP needs to contain policies which address the protection of designated sites of nature conservation importance, conservation of biodiversity in the wider countryside and the enhancement of biodiversity within development, taking into account the specific threats to habitats identified in the LBAP. The assessment of the effects of development proposals requires a disciplined approach, and decision-makers should be sufficiently well advised as to what makes a good environmental assessment and what the opportunities are for conserving or enhancing biodiversity.
- Only in exceptional circumstances of overriding public need or it has clearly been demonstrated that there is a national need, should new development be located in sites with international or national designation respectively, for nature conservation
  - Development plans should ensure that certain species and habitats are protected from harmful development, and this includes secondary impacts, such as the need for water abstraction, pollution from development or habitat fragmentation
  - Where appropriate all new development should help enhance the biodiversity resource in the Plan area, through native species landscaping, appropriate location, and open space management
  - The specific actions endorsed in the LBAP should be taken into account where relevant.
- 3.2.23 If a full appropriate assessment under the Habitats Directive 1994 needs to be completed for the LDP, and it identifies that there are likely to be significant impacts on the designated sites are identified, the adoption and

implementation of the LDP cannot occur unless changes are made to avoid or mitigate against these impacts.





Map 3.2: Nature 2000 sites in and adjacent to Bridgend County Borough



## Climate Change

- 3.2.24 It is predicted by the Intergovernmental Panel for Climate Change (IPCC)<sup>4</sup> that globally there is likely to be an increase in average annual temperature of around 0.8-2.6°C from 1990 temperatures to 2050, and by 0.4-1.1°C by 2025. Although the UK Climate Impacts Programme (UKCIP)<sup>5</sup> identifies for the UK there may be a 2-3.5°C increase in temperatures by the 2080s. The UKCIP predictions also show that average precipitation may show a decrease of 0-15%, with a likelihood of hotter and drier summers and wetter winters. Seasons may change, with spring temperatures occurring one to three weeks earlier and winter temperatures delayed by one to three weeks.
- 3.2.25 There may also be changes in extreme weather events, with high summer temperatures, similar to that of 1995 being experienced in one of five years by 2050s and three in five by the 2080s. Extreme winter precipitation will become more frequent.
- 3.2.26 Sea level changes are predicted by the IPCC to increase by 4 to 32cm from 1990 levels by 2050. In the UK relative sea level rise (including the effect of land movements) will continue to rise along the shoreline, in some parts of the UK this could be up to 86cm. The risk of extreme sea levels, occurring through combinations of high tides, sea-level rise and changes in winds will be experienced more frequently in many coastal locations. This may be a particular risk in the coastal towns and villages of the County Borough, and in particular in Porthcawl.
- Implications for the plan:**
- 3.2.27 Within the County Borough development that leads to an increase in release of gases which contribute to climate change must be minimised, for example by reducing the need to travel by motor vehicles and length of trips wherever possible and increased energy efficiency. The proportion of electricity generated from renewable resources needs to be increased, especially those sources that do not rely on the combustion of fuel e.g. wind turbines. This includes the need to consider small scale renewable energy generation to serve on-site energy needs of new development. Designing new buildings to meet the needs of changing seasonal weather will also be important, as increased summer temperatures and heavier winter rain will impact on the future design of buildings.
- 3.2.28 The impacts of climate change on the LDP area may be wide-ranging. This could include impacts on sensitive ecosystems and landscapes, especially where the ability of these areas to adapt to change is limited. For example, where the natural backward movement of dune systems has been blocked by built development which may mean that these areas cannot adapt to rising sea levels and become subject to erosion as well as increased flood risk.
- 3.2.29 Care will have to be taken in designing new development appropriately so as not to exacerbate risk of flooding etc that is associated with climate change. TAN8 (Strategic search areas for large scale, small and medium wind farm proposals and similar developments) and TAN15 (Flood Risk) include information on minimising flood risk and requirements to minimise emissions.

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<sup>4</sup> Intergovernmental Panel for Climate Change (2001) *Climate Change 2001: Synthesis Report*

<sup>5</sup> UK Climate Impacts Programme (2002) *Climate Change Scenarios for the UK: The UKCIP02 Scientific Report*

The LDP may also have to consider policies for the use of Sustainable Drainage Systems and other actions. The risk of storm surges and sea defence over-topping also needs to be considered. Also plant and animal migratory routes must be maintained so that species can move and adapt to changing climate.

- 3.2.30 There will be various ways in which development will have to adapt to climate change, particularly through the control of water and reducing the risk of flooding. Such considerations will be use of less non-permeable surface materials in new development that do not allow water to soak into the ground, sustainable drainage systems, the efficient use of water should also be taken into consideration. Other adaptations may be required in the design and layout of new building to allow shading and passive cooling to deal with higher summer temperature and prolonged times of high summer temperatures.

## **Water**

### **Surface water quality**

- 3.2.31 The River Quality Objectives set at UK National Government level seek to ensure that water quality in the UK only improves. The Environment Agency website contains details of water quality monitoring within the area of Bridgend County Borough, from fifteen monitoring points (some of which lie outside the boundary of the County Borough)
- 3.2.32 Data is available on the classification of rivers in Bridgend under The Water Framework Directive. This is EC legislation to ensure waters are managed to achieve good quality. All EU Member States must make plans to protect and improve lakes, rivers, groundwaters and coastal water habitats and to prevent flood and manage drought. The data in Figure 3.1 indicates whether the water in Bridgend County Borough is likely to meet the objectives of the Directive. The rivers categorised by the Environment Agency are those of most significance in the Country Borough, and do not necessarily include all surface water bodies. The risk categories for the water bodies are shown in the Figure, and these help to reveal what the impact of new development may have.
- 3.2.33 The data shows that many of the rivers in Bridgend County Borough may fail Water Framework Directive objectives, with four rivers or stretches of river falling into the 'at risk' category and six which are 'probably at risk'. The reasons for this risk are primarily from the physical or 'morphological' alteration many of these rivers have experienced, particularly where they flow through towns and villages and artificial banks. Other reasons are often due to diffuse pollution from discharge sites, which may come from agriculture. The Ogmore and Llynfi are also at risk from point source pollution, and this may be a matter the LDP should take into account.
- 3.2.34 Kenfig Pool, identified as a lake on the Environment Agency website as a 'lake' waterbody, and is categorised as 'probably not at risk' of failing quality objectives under the Water Framework Directive<sup>6</sup>.

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<sup>6</sup> All data from the Environment Agency website [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk) 'What's in your backyard?' section

Figure 3.1: Rivers identified in characterisation under the Water Framework Directive and their risk of failing river targets

River name	River ID	Risk category	Water body type	Main reasons for risk category status
Kenfig (nr.source)	GB110058026170	At risk	Low altitude, small catchment and calcareous geology	<ul style="list-style-type: none"> <li>• Diffuse pollution</li> </ul>
Kenfig	GB110058026180	Probably at risk	Low altitude, small catchment and calcareous geology	<ul style="list-style-type: none"> <li>• Water abstraction</li> <li>• Physical alternation</li> </ul>
Kenfig (nr.tidal limit)	GB110058026440	Probably not at risk	Low altitude, small catchment and calcareous geology	NA
Ewenny River (nr.tital limit)	GB110058026230	Probably not at risk	Low altitude, medium catchment and calcareous geology	NA
Ewenny	GB110058026240	Probably at risk	Low altitude, medium catchment and calcareous geology	<ul style="list-style-type: none"> <li>• Physical alteration</li> </ul>
Ewenny Fawr	GB110058026290	Probably at risk	Low altitude, small catchment and calcareous geology	<ul style="list-style-type: none"> <li>• Physical alteration</li> </ul>
Ewenny Fach	GB110058026270	Probably at risk	Low altitude, small catchment and calcareous geology	<ul style="list-style-type: none"> <li>• Physical alteration</li> </ul>
Ogmore (nearer source)	GB110058026260	At risk	Mid altitude, small catchment and siliceous geology	<ul style="list-style-type: none"> <li>• Diffuse source pollution</li> <li>• Physical alteration</li> </ul>
Ogmore River	GB110058026280	At risk	Mid altitude, medium catchment and siliceous geology	<ul style="list-style-type: none"> <li>• Point source pollution</li> <li>• Diffuse source pollution</li> <li>• Physical alteration</li> </ul>
Garw	GB110058026300	Probably at risk	Mid altitude, small catchment and siliceous geology	<ul style="list-style-type: none"> <li>• Diffuse source pollution</li> </ul>
Garw (nearer source)	GB110058026320	Probably not at risk	Mid altitude, small catchment and siliceous geology	NA
Ogwr Fawr	GB110058026340	Probably at risk	Mid altitude, small catchment and siliceous geology	<ul style="list-style-type: none"> <li>• Diffuse source pollution</li> </ul>
Ogwr Fach	GB110058026310	Probably not at risk	Mid altitude, small catchment and siliceous geology	NA
Llynfi	GB110058026330	At risk	Mid altitude, small catchment and siliceous geology	<ul style="list-style-type: none"> <li>• Point source pollution</li> <li>• Diffuse source pollution</li> <li>• Physical alteration</li> </ul>

Figure 3.2: Water quality objective compliance in and around Bridgend and Pencoed in 2002 to 2004<sup>7</sup>

River name	River stretch	Target	Compliance
ALUN	Conf.R.Ewenny - Conf.Stembridge Brook	Good	Marginal
COLWINSTON BROOK	Conf.R.Alun - Splott Plantation	Fair	Compliant
EWENNY	Conf.Nant Ganna - Conf.Ewenny Fach	Good	Significant Failure
EWENNY	Conf.Nant Pont Sannau - Conf.Nant Ganna	Good	Marginal
EWENNY	Conf.R.Alun - Conf. Nant Pont Sannau	Good	Marginal
EWENNY	Conf.R.Ogmore - Conf.R.Alun	Good	Marginal
EWENNY FACH	Conf.R.Ewenny Fawr - Felindre R.B	Good	Marginal
EWENNY FACH	A473 Road Bridge - Conf.Nant Gofer	Good	Marginal
EWENNY FACH	Conf.Nant Gofer - Llanharan Washery	Good	Significant Failure
EWENNY FACH	Felindre R.B - A473 Road Bridge	Good	Marginal
EWENNY FACH	Llanharan Washery - Pentwyn House	Good	Compliant
EWENNY FAWR	Conf.Ewenny Fach - Conf.Nant Ciwc	Good	Compliant
EWENNY FAWR	Conf.Nant Ciwc - Conf.Nant Crymlyn	Good	Compliant
GARW	Conf.R.Ogmore - Conf.Garw Fechan	Good	Compliant
LLYNFI	Conf.R.Ogmore - Conf.Trib.Coed Tondu	Fair	Compliant
OGMORE	A48 Road Bridge - Conf.Morfa Brook	Good	Compliant
OGMORE	Conf.Morfa Brook - Conf.Nant Ffornwg	Good	Marginal
OGMORE	Conf.Nant Ffornwg - Conf.R.Llynfi	Good	Marginal
OGMORE	Conf.R.Ewenny - A48 Road Bridge	Good	Marginal
OGMORE	Conf.R.Llynfi - Conf.R.Garw	Good	Marginal
NANT CIWC	Conf. R.Ewenny Fawr - Ty'n y Cwm	Good	Compliant
NANT CRYMLYN	Conf.R.Ewenny Fawr - Blaencrymlyn	Good	Compliant

3.2.35 The rivers in and around Bridgend may be most at risk from the impacts of new development. Figure 3.2 shows whether these rivers are meeting water quality objectives.

3.2.36 Figure 3.2 clearly shows that in the monitoring period 2002 to 2004 there were only nine stretches of river that were assessed which could be described as 'compliant' in meeting water quality objectives (out of the 22 sampled locations). There is also one 'significant failure' on the Ewenny at the confluence of Nant Ganna and Ewenny Fach, for reasons of high Biochemical Oxygen Demand, meaning there are high levels of bacteria in the river and therefore low levels of oxygen. This can be caused by high levels of organic pollution, usually from poorly treated wastewater, or high nitrate levels, which trigger high plant growth. Given the location of this monitoring point the cause is most likely to be runoff from agricultural fields.

3.2.37 Other data from the Environment Agency shows that rivers that flow through Maesteg are all compliant with water quality targets, this includes monitoring stations on the Garw, Llynfi, Nant Cedw, Nant Cerdyn, Nant Cwmdu and Nant

<sup>7</sup> All data from the Environment Agency website [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk) 'What's in your backyard?' section

Gadlys. Data from around Pyle also indicated that rivers in this area, particularly the Kenfig, are either in compliance or marginal in meeting quality targets.

#### **Transitional- Estuary Waters**

- 3.2.38 The Environment Agency also collects data on the quality of estuaries and other coastal waters. The Ogmere River Estuary in Bridgend was identified as a '*water body probably at significant risk of failing objectives*', this may be due to the water bodies flowing into the estuary. The Penybont Waste Water Treatment Works, is on the Ogmere near the Ogmere Estuary, the effectiveness of the WWTW at any one time may be reflected in the water quality of the estuary.

#### **Coastal Waters**

- 3.2.39 Quality has improved overall in England and Wales, and over 98% of monitored bathing waters now comply with the imperative standards of the EC Bathing Waters Directive. The target is to achieve, and maintain, at least 97% compliance. Bathing Waters are defined as;

*'Fresh or sea water in which bathing is explicitly authorised or is not prohibited and is traditionally practiced by a large number of bathers'*

- 3.2.40 Outer Bristol Channel North, which represents the coast of Bridgend is classified as 'at risk' by the Environment Agency. The coastal waters at Ogmere-by-Sea in the Vale of Glamorgan were given a rating of water body significantly 'at risk' of failing objectives by the Environment Agency. However, in 2004, the waters around Rest Bay and Sandy Bay- Porthcawl (in the south west of the County Borough) were compliant with guide values of the EU Bathing Water Directive. In 2005 results showed that neither of these areas were failing to conform to this Directive's limit value, in the total coliforms and faecal coliforms taken. Tests taken at Rest Bay, Porthcawl also passed the higher, guideline standards which take into account compliance with the Bathing Water Directive as well as other factors not related to water quality, which is the recommended, highest standard of bathing water in the Encams Seaside Awards in 2004 and awarded the Green Grade. The compliance with the Bathing Water Directive has economic and social sustainability implications in terms of tourism and increased visitors attracted due to the fact there are Blue Flag beaches.

- 3.2.41 Recent improvements in waste water treatment and the construction of Combined Sewerage Overflows (CSOs) in Bridgend County Borough to avoid storm events which discharge polluted water directly into rivers, has resulted in improvements to water quality, particularly bathing waters which had been adversely affected by diffuse water pollution i.e. faecal pollution and that from agricultural and/or urban runoff after heavy rain.

#### **Ground Water**

- 3.2.42 There are three groundwater locations identified within the County Borough one is categorised 'not at risk', the other two are categorised 'at risk' and 'probably at risk'. As with river water quality these have been characterised as part of implementing the Water Framework Directive, by Environment Agency Wales.

#### **Water Resources**

- 3.2.43 The Environment Agency Wales has produced a Water Resources Strategy for Wales, the strategy reflects issues relating to water resource availability. It

looks 25 years ahead, and considers the many changes that may occur over this time. Around 24% of the total amount of water abstraction licensed in Wales is for direct use by industry and commerce. Most of the remainder is used for public water supply, however, nearly half the water abstracted for public water supply is transferred out of Wales, although this is more common in North Wales.

- 3.2.44 Although changes predicted for agricultural, industrial and commercial water use require increases in supply, the impacts of these are localised. The total requirements predicted in 2025 under all the scenarios considered for Wales as a whole are less than the current total licensed quantity.
- 3.2.45 Climate change is of great significance to water resources. Present analysis suggests that over the next 25 years, summers could become drier and winters wetter, but with a likely average reduction in precipitation levels, with temperatures likely to increase<sup>8</sup>. Therefore water needs and availability will need to be kept under review although Wales is often considered to have abundant water resources. There are some areas where improvements to the water environment may nevertheless, be necessary. This may require the recovery of some 13 million litres per day (Ml/d) from existing licensed abstractions; therefore continued availability of reliable public water supply is essential. With a recommended enhancement of public water supply by up to 7 Ml/d above present levels by minor resource development and infrastructure improvement to move water from areas of surplus to areas of need<sup>9</sup>.

***Implications for the plan:***

- 3.2.46 Generally water quality in and around the County Borough is good, although at risk, and this must be maintained and where necessary, (in regard to the rivers which are at risk) improved. However the ways in which the LDP can effect this are limited. Therefore it must be ensured that there is sufficient sewage treatment capacity for all new development, in all locations throughout the County Borough. Every attempt should be made in new development to secure conditions and section 106 agreements to improve drainage including prevention of storm runoff being directly discharged into surface waters. In addition if practicable river banks may need to be reverted to a more natural form, and any existing culvert removed.
- 3.2.47 Design of new development should aim to incorporate as many water efficiency features as possible, as well as water treatment where suitable. New development should be built only when it ensures that there is sufficient sewerage capacity available. It may also be suitable to ensure flood risk is reduced through appropriate measures, such as those set out in the climate change section of this document.
- 3.2.48 Other implications include the importance of ensuring where previously developed sites are redeveloped potential contamination is recognised and suitable remediation is carried out prior to re-development.

**Flood Risk**

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<sup>8</sup> The National Assembly for Wales (2001) *Climate Change Wales: Learning to Live Differently*;

<sup>9</sup> Environment Agency Wales (2001) *Water Resources for Wales: a strategy for the future*



- 3.2.49 Areas of Flood Risk are identified on the Environment Agency flood maps for all main rivers and minor watercourses in the County Borough.<sup>10</sup> In general along these rivers the risks of flooding range from 'significant' to 'low'. Areas at significant risk (a 1 in 75 probability) include that area around the Bridgend Recreation Centre and playing fields adjacent to the River Ogmore down to its confluence with the Ewenny. There is also a 'significant' risk up the Ewenny to Pencoed. It may also be suitable to cross reference these maps with those contained in TAN15 Flood Risk.
- 3.2.50 There are also risks of flooding in Pyle (low) from the Kenfig, and in the valley towns of Maesteg (significant) and Ogmore Vale (significant). There is also a risk of tidal inundation in parts of Porthcawl.
- 3.2.51 Despite flood defences in Bridgend on the Ogmore, some defences near Junction 35 of the M4 on the Ewenny, and defences at Maesteg on the Llynfi, there is the increased risk of 'over-topping' in times of very high flow following storm events. The risk from storm surges is of particular significance in Porthcawl. These risks need to be taken into account when deciding on appropriate locations for new development.

***Implications for the plan:***

- 3.2.52 Flooding represents a significant risk to human health and property in the existing built up area, and fluvial flooding in particular is likely to increase with climate change. Therefore it is important that development on the flood plain, and in flood risk areas, is subject to flood consequences assessments, and wherever possible sustainable drainage systems implemented for rain water management. The rivers that flow through the urban area have higher flood risks related to them, although the land area at risk is limited to a few metres either side of rivers. There is also a risk from tidal inundation in coastal and estuary locations. Whereas at present coastal defences prevent this, climate change and sea level rise could act together to increase risk of 'over-topping' of these defences causing flooding. Therefore proposed development behind current flood defences will need to take this eventuality into account. Detailed planning guidance on the management of flood risk when formulating proposals in Development Plans and in future Development Control is given in Planning Policy Wales Technical Advice Note (TAN) 15. (WAG 2004).<sup>11</sup>

**Air Quality**

- 3.2.53 Bridgend does not currently have any Air Quality Management Areas, but figures from the air quality archive<sup>12</sup> 2004, 2005, and projections to 2010 show that air quality will improve based on predicted improvements in cleaner technology, particularly in cars. Neighbouring Counties of Swansea and Neath Port Talbot, all have Air Quality Management Areas in place, Bridgend is at risk of poor air quality particularly as the M4 crosses the County Borough. There is little data on other air pollutants such as nitrous oxides and ozone available for Bridgend that is in a form useful for this baseline information gathering process.

***Implications for the plan:***

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<sup>10</sup> Environment Agency – [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk) Flood maps

<sup>11</sup> Planning Policy Wales Technical Advice Note 15: Development and Flood Risk. (WAG) July 2004

<sup>12</sup> Local air quality management [www.airquality.co.uk](http://www.airquality.co.uk)

- 3.2.54 The relatively good air quality of the County Borough should be maintained. This will mean helping to reduce the need to travel by car, as this is a main contributor to air pollution. Also the LDP should ensure polluting development does not occur near sensitive receptors such as residential neighbourhoods, schools and hospitals.

### **Transport**

- 3.2.55 Bridgend County Borough Council is located midway between Cardiff and Swansea on the M4 corridor (the Cork to Kiev Euro-route). The County Borough has good road communications – having 3 junctions off the M4 Motorway. It has a mainline railway link to Cardiff / London and other major cities, a local line to Maesteg and the Vale of Glamorgan line to Cardiff via Barry recently reopened for passengers. Cardiff Wales Airport lies some 15 miles to the south east. The location on the M4 has had a significant effect on the new development attracted to the County Borough. The reason for this is that new development is attracted to the County Borough because of quick access onto the motorway system. This has economic advantages for the County Borough, although the level to which new development attracted by the M4 has direct sustainability benefits for existing communities of Bridgend should be assessed further. The benefits of the road are tempered by the associated potential for increasing traffic levels and localised congestion, safety and air quality problems.
- 3.2.56 SEWTA (The South East Wales Transport Alliance), is a consortium comprising of the 10 local authorities in South East Wales, including Bridgend County Borough Council. It does not, however, have a direct responsibility for highways or road safety. It serves to encourage funding for transport from National and UK sources. SEWTA's focus is the delivery of integrated transport, encouraging modal choice, and promoting more sustainable transport modes. It's counter part in the South West SWWITCH, (South West Wales Integrated Transport Consortium) which incorporates the Counties of Neath Port Talbot, Swansea, Carmarthen and Pembrokeshire, has similar aims to SEWTA.
- 3.2.57 In the 'Transport Grant Bid 2006/7' SEWTA set out their approach to future transport needs<sup>13</sup>. Those relevant to Bridgend include improvements to the Maesteg rail line, to improve frequency of trains and a new station to be built at Brackla. There are also bus priority schemes in Bridgend town, and new transport interchanges are planned.
- 3.2.58 The main transport links to the northern valleys of Bridgend County Borough, of Llynfi, Garw and Ogmore is via Junction 36 of the M4 which also represents the gateway to the southern part of the County Borough where the majority of existing employment opportunities can be found. The operational capacity of the junction has been exceeded in recent years, and the lack of train connections to the Garw and Ogmore valleys means that many of Bridgend's most deprived communities have been disadvantaged in terms of accessing the labour market and areas of expanding economic growth.
- 3.2.59 It is now also generally acknowledged, including in the adopted UDP, that while new construction of roads may create extra highway capacity, this will not, in itself, solve all of the problems caused by traffic congestion. Other more environmentally acceptable measures, such as a physical reduction in

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<sup>13</sup> South East Wales Transport Alliance [www.sewta.gov.uk](http://www.sewta.gov.uk)

highway capacity, as suggested in the transport section of the adopted UDP, should be considered in addressing the issues involved.

- 3.2.60 The Council recognises that by pursuing this approach, which is justified on economic and environmental grounds, some cars may be displaced, especially during peak periods, with initial inconvenience to their users. Such losses could, however, be mitigated by the further provision of priority measures to aid efficient movement of buses, cyclists and pedestrians, thereby supplementing progress which has already been made on pedestrianisation plans, cycle and community routes and providing safe routes to schools in the County Borough, whilst encouraging modal shift, and improving the local environment. In this respect, the Council has previously stated its confidence that the overall impact of its transportation policies will be to the social, economic and environmental benefit of all residents of the County Borough.

***Implications for the plan:***

- 3.2.61 The LDP in partnership with the new South East Wales Regional Transport Plan to be produced by SEWTA, must ensure the economic and environmental health of the County Borough. Improving access for those without cars and encouraging those with cars to use alternative forms of transport should be a fundamental objective of the LDP to ensure environmental impacts are minimised and there is equity of access to jobs and services. Major transport schemes will be assessed under other regimes, but the LDP must set standards for ensuring major schemes are constructed only when there is a proven need and where local environmental and social impacts can be mitigated. Opening up routes into the valleys, particularly by more sustainable transport modes is a key aspect of ensuring these communities can partake in the economic growth resulting from proximity to the M4.

**Historic Environment**

- 3.2.62 The built heritage encompasses ancient monuments, listed and other historic buildings, conservation areas, and historic parks, gardens and landscapes. It is important that the nation's cultural experience, as expressed through its historic and built environment, is enjoyed in an undiminished and preferably enhanced form by future generations. The built heritage, because it reminds us of our origins and is essentially traditional in its appeal, plays a particularly significant part in our quality of life. Historic buildings, ancient monuments and other elements of the cultural heritage can frequently be important and abiding contributors to the character and identity of local communities. As well as its cultural and aesthetic importance, which is of itself worthy of preservation, the built heritage can provide a major source in the study of a community's history, and can attract substantial economic benefits to an area; whilst the conservation of the energy and materials used in the construction of historic buildings is inherently sustainable. The County Borough contains many rich and varied examples of man's built heritage ranging from prehistoric times to the present day. Iron Age hill forts, Norman castles, Tudor Great Houses, estate villages, industrial heritage and Victorian or Edwardian buildings of distinction enhance local character throughout the County Borough, and should be protected and enhanced in the public interest. Welsh planning guidance advises that it should be protected, and local authorities should maintain and strengthen their crucial role in securing its conservation.

- 3.2.63 Archaeological remains are a finite and non-renewable resource, and in most cases they are also fragile and vulnerable to erosion, damage and destruction. As the product of human activity in the County Borough since pre-historic times, these remains are now in varying states of condition and completeness. Some remains are small and barely visible in the modern landscape e.g. an eroded Bronze Age tumulus or burial mound, a rampart to an Iron Age hill fort or a mediaeval field pattern; whereas others may be more substantial and well preserved e.g. Coity Castle, the Old Bridge at Bridgend, and the Bedford Iron Works. The County Borough contains 62 scheduled monuments of national importance. In addition there are many known archaeological monuments which do not benefit from being scheduled but nonetheless are recorded on the County Sites and Monuments Record which is maintained by Glamorgan-Gwent Archaeological Trust. All ancient monuments are material considerations in the planning process. The Council considers the archaeological resource of the County Borough to be considerable and varied, and should therefore be managed appropriately, and in the interests of sustainable development.
- 3.2.64 Cadw's records show that there are 361 listings of buildings of special architectural or historic interest in the County Borough, consisting of 8 buildings at Grade I (of exceptional interest), 37 at Grade II\* (of particular importance of more than special interest) and 316 Grade II (of special interest which warrant every effort being made to preserve them). The County Borough also contains 15 designated Conservation Areas, designated for their special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, which are often the historic centres of towns and villages. The setting of listed buildings and conservation areas are also important to retain where these add value to the building and / or the area concerned.
- 3.2.65 Part 1 of the *Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales* prepared by Cadw/CCW/ICOMOS addresses historic parks and gardens. The County Borough contains 5 historic parks and gardens, of which one, Merthyr Mawr House is grade II\*, and Bryngarw, Court Colman, Glanrhyd Hospital and Tythegston are grade II. Part 2 of the above *Register* addresses historic landscapes. Part 2.1 includes two areas of the County Borough in a single landscape of 'Outstanding Historic Interest': Merthyr Mawr Warren and Kenfig & Margam Burrows are important littoral sand dune landscapes incorporating archaeological sites buried beneath the sand. Part 2.2 includes Margam Mountain as a landscape of 'Special Historic Interest' extending from Neath Port Talbot County Borough to Bridgend County Borough. This landscape is a discrete block of the South Wales uplands which displays continuity, density, and diversity of human occupation from the prehistoric period to the recent past. These denitrified historic landscapes, and other landscapes of the County Borough, often also make an important contribution to biodiversity due the presence of important landscape features and land management practices which may have remained unchanged for a long time.

***Implications for the Plan:***

- 3.2.66 Care for the built heritage is fundamental to sustainable development. Any development which directly affects architecturally or historically important buildings, areas, monuments, historic parks & gardens and historic landscapes or their settings must take into account their specific characteristics and ensure that they are preserved or enhanced. Any development will need to take into account the quality of the historic

environment in the area. The LDP should encourage high quality design and carefully-sited accessible development that is both in keeping and scale with its location and sensitive to the character of the historic built environment.

### **Open Space**

- 3.2.67 The Council's Policy and Strategy Document "Development and Management of Children's Play Areas" (Nov 1998) sets the parameters for a review of the level and standard of the current service and provides the framework for its future management and development. Periodic reviews of this policy will be carried out to ensure the continued evolution and improvement in line with developments in children's play, as required to inform policy in the emerging LDP.
- 3.2.68 The Council's proposed minimum standard of 2.4 hectares per 1000 population for 'Open Space' is derived from the NPFA's recommendation for Outdoor Playing Space which includes Children's Playing Space and Outdoor Sport and an additional requirement for Public Open Space. This minimum standard should be met or exceeded wherever possible in all new housing developments. Developers will be required to secure the provision of open space and other recreational facilities in accordance with planning conditions or through planning agreements/obligations. The exact requirements for each proposal will, thereby, be subject to agreement with the Council, and will address any community loss and/or increased deficiency in recreation provision resulting from the proposed development(s). Although the needs will be clearly dependant on the findings of any future review.
- 3.2.69 The rights of way network provides a major recreational resource and the opportunity to experience a variety of landscapes and settlements within the County Borough. Using the network has health benefits and can be a good way to help residents maintain a healthy lifestyle. The Council is committed to produce a Rights of Way Improvement Plan by November 2007.
- 3.2.70 The network of public rights of way in the County Borough includes 497 km of public footpaths, 81 km of public bridleways and 7 km of Byways Open to All Traffic. There are also 34 km of community route/cycle tracks. All of these provide Bridgend with a substantial traffic free alternative network for commuting to work, travelling to school or enjoying the countryside for recreation and leisure reasons.
- 3.2.71 The provision of urban green space is of importance to sustainable communities providing recreation and space for exercise. 'Providing Accessible Natural Greenspace in Towns and Cities - A Practical guide to assessing the resources and implementation of standards for provision in Wales', (CCW / WAG (2003)) draws upon work carried out by English agencies and justifies the importance of open space in urban areas in Wales and sets standards for its provision.

### ***Implications for the plan:***

- 3.2.72 The recently carried out audits of land available for outdoor sporting activities and children's playing space in the County Borough showed that there was a deficiency in overall provision, however there are significantly lower levels of other forms of open space in some parts of the County Borough. This means that any intensification of residential development in certain locations could result in a drop in the availability of recreation space per person. The LDP must not only protect existing open space but encourage extra provision as

part of any development , taking into account the results of further assessments undertaken during LDP preparation.

- 3.2.73 New development located in close proximity to existing public rights of way networks should ensure that it makes appropriate access provision onto these networks from the development. Where possible such development could also contribute towards its enhancement and upkeep, in terms of quality and safety for use.

### **Minerals**

- 3.2.74 Bridgend County Borough has two active limestone quarries at Cornelly, and Gaens near South Cornelly, which produce about 1.75 million tonnes per year of aggregates and high quality limestone for steel manufacture. There is also a sandstone quarry at Cefn Cribbwr which operates intermittently; an inactive limestone quarry at Grove, South Cornelly; and a dormant quarry at Stormy Down. Coal is extracted at Park Slip West by opencast operations. All of the small mines in the area have ceased working. There are a number of land based sand and gravel resource areas which have been safeguarded to avoid sterilisation.

- 3.2.75 Data on current reserves is only given in the South Wales Regional Aggregate Working Party Annual Report (2003) as a combined total for Blaenau Gwent, Merthyr Tydfil, Monmouthshire, Newport, Torfaen and Bridgend. Data shows that sales of crushed rock has fallen since 2001 when it was 1.54 million tonnes, to 2003 when it was only 0.73 million tonnes. The reserves at the end of 2003 were 75.3 million tonnes for these six authority areas combined, although confidentiality means no individual landbank figures are available. There is a strong and consistent market for limestone with low sandstone resources capable of exploitation.

- 3.2.76 The use of minerals and protection of primary resources should be a consideration of other aspects of the LDP, for example reducing use of primary materials for construction, and re-use of construction and demolition wastes.

### ***Implications for plan:***

- 3.2.77 Development in the Bridgend Country Borough needs to take into account the landbank of minerals and rock in the area and ensure there is a minimum of 10 years supply for hardrock throughout the plan period commensurate with MTAN 1 and the SWRAWP Regional Technical Statement. Development should be appropriately located so as not to sterilise these resources. The LDP should ensure that any new applications for mines or quarries take into account environmental and social impacts of this type of development.

### **Waste**

- 3.2.78 Bridgend County Borough is part of the South West Wales Regional waste area, and the strategy set out for waste in this area is the 'Regional Waste Plan for the South West Wales Region' (2003). This plan sets out considerations for the future management of waste in the area, including the reduction of waste and more sustainable waste management, and meeting European and UK waste management obligations and targets. The plan follows the main principles of regional self sufficiency, the proximity principle, the waste hierarchy (reduce, re-use, recycle/compost, recovery, disposal), and sustainability.

- 3.2.79 Background information on waste management is included in the 'Strategic Assessment Report' (2002) for the South West Wales Regional Waste Plan Forum. This identified that total waste arisings in Bridgend was 356,672 tonnes (not including agricultural waste which raises the total to 416,634 tonnes), in 2000/2001. The majority of waste was from construction and demolition, with a large amount from commercial and industry (not including special wastes) and only around 18% municipal waste. However over 90% of construction and demolition wastes are recycled, and some waste is exported. In Bridgend data shows that 116,696 tonnes was landfilled in 2000/2001, and 1,287,198 tonnes in the South West region in total. Therefore there is a heavy reliance on landfill in the area at the current time. There has been a marked and significant increase in the level of recycling of commercial / industrial waste highlighted by the number of new MRF's.
- 3.2.80 The following waste facilities are utilised by Bridgend County Borough Council. A new materials recovery and energy centre at Crymlyn Burrows in Neath Port Talbot to manage all household and some trade waste collected in the County Borough (a joint venture scheme). In addition, three new Household Waste Recycling Centres (CA sites) have recently been constructed at Maesteg, Ogmere Vale and Brynmenyn to provide local public facilities for the proper disposal of household wastes.
- 3.2.81 The identified strategy for waste management is to bring about a reduction in landfilling and increase in composting and materials recovery, seeking to increase recycling and composting from 8% in 2000/1 to 69% in 2013. Therefore new facilities will be required, including Materials Recycling Facilities, and composting sites.

**Implications for plan:**

- 3.2.82 It is important that the Bridgend LDP takes into account the future waste management needs of the wider South West Wales region in accordance with the Regional Waste Plan. This is in order to ensure that there is sufficient suitable land available for the development of facilities that will support more sustainable management facilities, such as compost sites and materials recycling. The LDP will need to show a good understanding of these requirements, and ideally could identify suitable sites or areas through allocations in the plan. This will enable stakeholders, including the public, to better comment on any proposals at a strategic level.

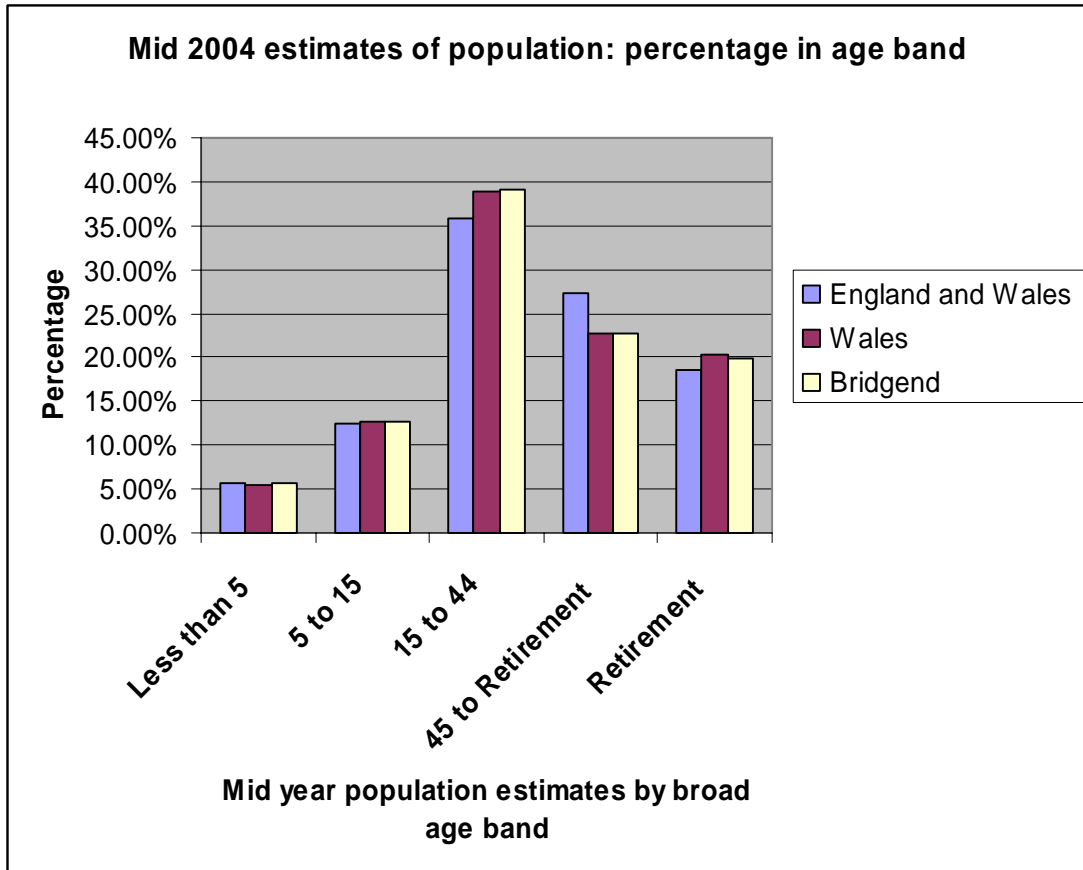
### **3.3 Social and Economic Issues**

#### **Population and Housing growth**

- 3.3.1 The Land Use Strategy of the current UDP contains a requirement for 9950 new dwellings to satisfy the future housing needs of Bridgend County Borough in the period 1996-2016. This reflects a continuation of the population growth in the County Borough over the last forty years from 108,950 in 1961 to 128,700 in 2001. Overall, however, population growth rates are 2 per cent lower than that of Wales as a whole. The population density of Bridgend in 2004 averaged 511 people per square kilometre, compared with an average of 139 for Wales, reflecting the relatively urban nature of much of the County Borough.
- 3.3.2 In mid-2004 Bridgend had an estimated 130,400 residents with 78,800 people of working age, which is almost equal to the Wales average.

3.3.3 According to the 2004 Mid Year Estimate 32.2% of the population is accounted for in the age groups of 20-44, which is the same as the Wales average but lower than the England and Wales average. These statistics are shown in Figure 3.3. The 2004 Mid Year estimates also indicate that there is a marginally lower percentage of people aged 15-19 than the England and Wales average. There is a slightly lower proportion of people in Bridgend of retirement age compared to the Wales average. (19.8% compared with 20.4%); although this is higher than the England and Wales average at 18.6%.

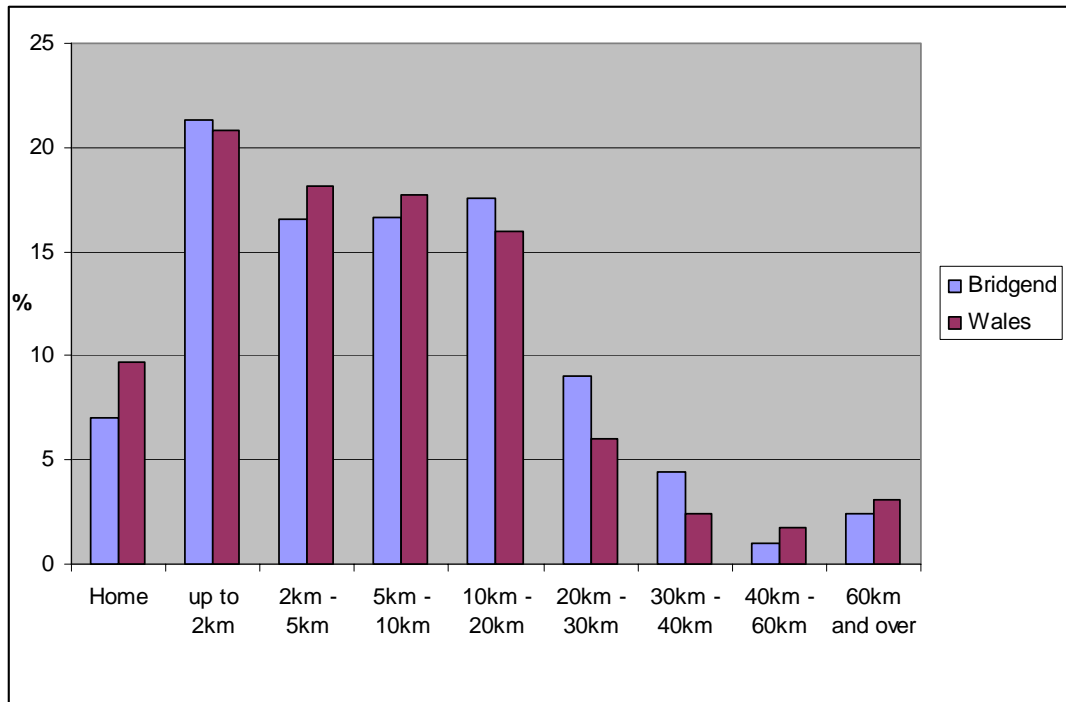
Figure 3.3: Population estimates mid 2004: proportion by band



3.3.4 In-migration has had a significant influence. Major improvements to the area's infrastructure, for example, the construction of the M4 motorway in the late 1970's and early 1980's, and prestigious inward investment projects by the Ford Motor Co., and Sony, boosted the attractions of Bridgend, as a near neighbour to Cardiff, to in-migrants. Figure 3.4 shows that many in Bridgend commute further to work than the Wales average, suggesting out commuting is higher than in many other areas. Most notably the rates for 10km - 40km are higher than the Wales average. The number of home workers is notably lower. Commuting details are discussed further in paragraph 3.3.26,

Figure 3.4 Travel to work by distance.





- 3.3.5 Those inward investments bolstered the pre-existing local demand for additional housing in the area, and was satisfied to a substantial degree by the development of new residential areas e.g. the eastward expansion of Bridgend town at Brackla comprising, approximately 4,000 new dwellings and the extension of existing residential areas in other towns e.g. Pencoed; and the progressive expansion of Porthcawl which also attracted people seeking retirement. Currently further major expansion of Bridgend is occurring at Broadlands to the west with another area planned for Parc Derwen to the northeast.
- 3.3.6 The 2001 Census also reported that there were 53,342 households in the County Borough. The projection methodology used to calculate the housing requirements in the UDP uses data on existing households and population of the County Borough and incorporates a migration element that would account for ongoing regional and local factors which could influence future levels of in-migrant growth in the County Borough, e.g. the possible implications of an implemented Green Belt around Cardiff, and the realisation of the full potential of Cardiff Bay. The requirements of meeting needs of an economically expanding Cardiff are also highlighted in the Wales Spatial Plan. As a result of the Council's projected overall housing requirement and resultant household change, as contained in the UDP, the County Borough's population is projected to rise to 140,355 by 2016 although this may be subject to revision by an agreed set of population and household projections currently under discussion by the South East Wales Planning Group. This growth, coupled with national trends to form smaller households, produces an estimated increase of 6,557 households, between 2001 and 2016. This corresponds with a dwelling requirement of 7,350 over the same period
- 3.3.7 A housing needs survey carried out in 2002 estimated over the five year period to 2007 1170 new affordable dwellings would have to be provided, based on a study of the housing need in the area. This study identified that over 2 per cent of the households in Bridgend were in housing need at that time.

- 3.3.8 Statistics on Welsh language speaking in Bridgend from the 2001 census show that the percentage of residents of the area who could speak Welsh increased from 8.3 per cent in 1991 to 10.8 per cent in 2001, an increase of 2.5%. Although this proportion is still well below the Wales average of 20.8%<sup>14</sup>.

***Implications for the Plan:***

- 3.3.9 The LDP will have a major impact on housing provision, as the Council is charged with setting and / or agreeing in a Regional context the housing requirement for the plan period, as well as allocating suitable sites to deliver much of this requirement. Planning to deliver sufficient housing to meet the future needs of the local residents is essential. This is coupled with ensuring housing comes forward at an appropriate rate to support the economy of the area, and in suitable locations to support a sustainable spatial strategy and reducing the need to travel. The LDP must also work in partnership with the Local Housing Strategy to ensure the right type of housing is built to deliver housing to all especially those least able to afford it.
- 3.3.10 The Plan in partnership with the Local Housing Strategy should give clear definition on what the authority considers to be affordable in the plan area in terms of relationship between local income levels and house prices or rents for different types of households. With a suitable affordable housing target set up for new sites. The LDP will need to consider how to reverse the pockets of deprivation throughout the County Borough, and help ensure equitable access to decent housing, jobs and services for all.
- 3.3.11 Figures for distances travelled to work indicate that the LDP can have a role to play in reducing these distances, to bring more in line with the Wales average. More self-contained towns providing homes and jobs should help in achieving this. It may also be suitable for the LDP to consider how home working levels can be encouraged and improved, as the reduced travel this creates can have many sustainability benefits.

**Health and Disparities**

- 3.3.12 Bridgend Local Health Board is responsible for joined-up-thinking and improvement of the human health of those living in the County Borough. The “*Assessment of need for Bridgend County Borough*” document published in 2003 outlines some of the key issues for those living in the County Borough. This document was the initial needs assessment for the preparation of the “*Health Social Care and Well Being Strategy*” 2005-2008 which was approved in December 2004.
- 3.3.13 There is a good deal of useful health and well-being baseline data, only some of which is included below. Generally, although the County Borough has higher employment levels than the Wales average, and lower levels of smoking, the overall health levels in the County Borough need to be improved.
- 3.3.14 From the ‘Welsh Health Survey 1998’, Bridgend County Borough has poorer mental and physical health than the all Wales average. (It should be noted, however, that figures for mental health may be skewed by the presence of a substantial mental health facility in the County Borough.) Only 26% of adults in Bridgend County Borough are active at the recommended levels for health

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<sup>14</sup> Welsh Language Board *Census 2001: Main statistics about Welsh*

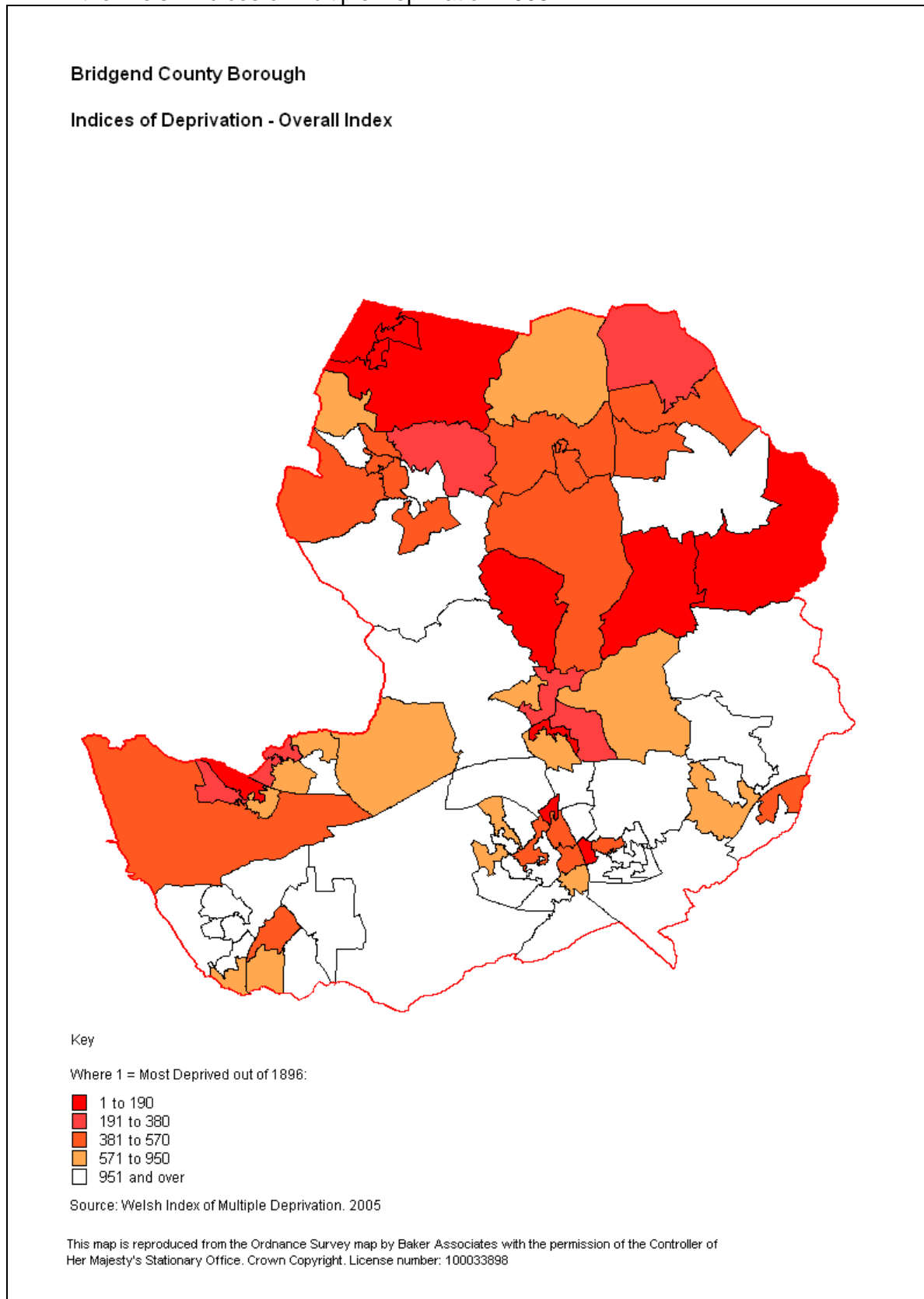
(3 or more occasions per week of moderate to strenuous exercise), just above the Welsh average. In 2000, one third of boys aged 11-12 and half of boys aged 15-16 in Wales took part in physical activity outside school for at least four hours per week. Only one fifth of girls aged 11-16 exercised at this level. Poverty and overcrowding are still associated with the spread of communicable disease such as TB (tuberculosis). Studies also show that physical health problems and psychological distress have been found to be related to overcrowding, damp housing, mould, indoor pollutants, cold and homelessness within the County Borough.

- 3.3.15 The study '*An Integrated Healthcare Strategy for Primary Care Premises*' (April 2004) for Bridgend Local Health Board, identified key characteristics of the health of the County Borough. This identified disparities in the health of the County Borough's residents hidden in the local authority wide statistics. These disparities may in part be caused by the geography of the area, and the possible isolation of valley communities to the north of the area. This leads to a sparse population pattern, with 21 out of 28 electoral divisions having population density of less than 10 per hectare. The study identifies a possible issue with access to health services in the north of the County Borough. Two communities (out of seventeen) were identified in the County Borough as having a low range of health providers, limited to local GP surgeries.
- 3.3.16 Statistics from the Welsh Index of Multiple Deprivation 2005<sup>15</sup> give an overall measure of deprivation throughout Wales. This is shown for Bridgend County Borough in map 3.3. The data is provided on a Lower Super Output (LSOA) geographical area basis of which there are 85 in Bridgend County Borough out of a total in Wales of 1896. The overall index shows that 10 LSOAs in Bridgend County Borough are in the most deprived 10% in Wales. The three most deprived LSOAs in Bridgend are:
- two parts of Caerau ward, the first ranked 35 out of 1896 in Wales, and the second ranked 66 out of 1896 in Wales
  - Bettws ward ranked 62 out of 1896 in Wales
- 3.3.17 Other LSOAs in the 10% most deprived in Bridgend are: Blackmill (whole ward), and parts of the wards of Sarn, Cornelly, Brackla and Morfa (Bridgend).
- 3.3.18 The least deprived areas are generally, south of the M4 but also include parts of Maesteg, Llangynwyd and Ogmores Vale.

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<sup>15</sup> Welsh Index of Multiple Deprivation 2005

Map 3.3: Map showing relative deprivation levels in Bridgend County Borough using the Welsh Indices of Multiple Deprivation 2005



3.3.19 The report *Health Social Care and Wellbeing: assessment of need for Bridgend County Borough (2003)* gives some findings on health and deprivation in the County Borough. The report indicates that the north of the County Borough experiences more hardship than areas to the south of the M4. Although the map shows some areas as less deprived it is likely that there are pockets of deprivation throughout the area. In particular where communities are more isolated with fewer services. These more geographically isolated people do not use services available to them for a range of reasons, including transport and communication. Disparities and high levels of poverty are linked to other issues, such as higher crime rates, risk of health problems including mental health, and even increased child pedestrian injury.

*Implications for the Plan*

- 3.3.20 The planning system can generally only play a minor role in improving health. Other factors such as lifestyle and poverty are likely to be more significant factors in health indices. However the planning system can influence issues such as road safety through layout and design and encouraging exercise through open space provision and protection. Physical aspects of regeneration are also likely to come forward through the effecting issues such as housing quality.
- 3.3.21 The LDP will have a more limited local role in transport planning given the move to strategic planning in Regional Transport Plans, however it can promote more sustainable modes of transport, especially that help promote equity of access such as bus use. Therefore the LDP does have a role to play in ensuring new health, training and other matters are suitably located to meet local peoples' needs and that they can be accessed by alternatives to the car.
- 3.3.22 The LDP recognises the disparities of the County Borough and actively aims to direct development to tackle such issues. As a result, future development that would benefit less deprived communities at the expense of those which are already well-served may need to be considered in the interest of achieving a more sustainable balance.

**Employment**

3.3.23 Bridgend has been identified as one of the ten fastest growing local authorities in the UK in terms of job creation. Of particular note is the fact that in 1995 manufacturing employee jobs stood at 29.7% of total employment, whereas in the latest NOMIS Labour Profile it stood at 21.2% representing a significant downward trend. Since 2004 there has been a continuing and dramatic contraction of manufacturing jobs. On the other hand, service employee jobs in Bridgend stood at 65% in 1995 compared with 73.4% in the latest NOMIS Labour Profile. Unemployment figures from the 2004 Labour Force Survey indicate that the unemployment rate for Bridgend stood at 3.7%, lower than that for Wales and the UK at 4.8% and 4.7% respectively. On the other hand figures from the 2006 Claimant Count method indicate that the unemployment rate for Bridgend is 2.9% which is higher than the corresponding Wales and UK figure at 2.6%. The Employment Rate for Bridgend in 2004 was 74.6% above that for both Wales (71.2%) and the UK (74.2%).

- 3.3.24 Despite the considerable success of inward investment and the local economic transformation from almost total dependence on coal and heavy engineering to the current situation where services and light engineering/manufacturing are dominant, there are still significant weaknesses in the local economy. New jobs established in the growing service sector often tend to be part time and therefore do not fully compensate for the loss of jobs previously associated with deep coal mining and heavy manufacturing, and do not provide employment for the same groups who lost their jobs through closure of these industries and in the same areas. This is borne out as whilst the overall economy of the County Borough continues to be buoyant it disguises significant local anomalies.
- 3.3.25 The employment base is concentrated in the south-east of the County Borough, with just five wards in the south accounting for 50% of total employment. The northern valley communities however continue to face the problems which are typical of many former mining communities throughout South Wales, with high levels of youth unemployment and economic inactivity. Eight wards are within the two hundred most deprived wards in Wales. Bridgend County Borough qualifies for Objective 1 assistance from the EU, the criteria for which are based on higher than average unemployment, lack of services and poor basic infrastructure
- 3.3.26 Statistics on commuting of employees and self-employed to and from the County Borough for work show that around 17,200 people commute out of Bridgend for their main job and 14,200 commute into Bridgend County Borough, a net outflow in working age population of 3%. Of the outcommuters around 4000 travel to Cardiff and 3000 each to Rhondda Cynon Taff and Neath Port Talbot, other out commuting is to the Vale of Glamorgan, Swansea and outside Wales. Those commuting into Bridgend come from Rhondda Cynon Taff and Neath Port Talbot, with 4000 and 3000 commuters respectively, other significant amounts of in commuting are from the Vale of Glamorgan, Cardiff and Swansea<sup>16</sup> (see Figure 3.4).

***Implications for the plan***

- 3.3.27 In Bridgend there are a variety of socioeconomic factors such as a low skills base and lack of entrepreneurial initiative that may present an underlying weakness in the economy. Recent progress has been effective in increasing overall employment levels, but may have not been sufficient to overcome the complex and deep seated economic and social problems faced by the County Borough especially within the disadvantaged valley areas. The LDP must ensure that it works in order to encourage higher levels of economic growth and that the correct type of growth is encouraged throughout the area, and ensuring new jobs are provided to meet the skills of the local workforce, and that skills are developed to meet the type of employment proposed.
- 3.3.28 The Plan should support growing business sectors, and seek to actively encourage the diversification of the economy especially towards higher value-added products and services, so that it is less reliant on traditional manufacturing, which has seen a dramatic decline in recent years, highlighting the economy's vulnerability.
- 3.3.29 There is currently a net out commuting from Bridgend and in terms of achieving greater sustainability it may be appropriate for the LDP to ensure

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<sup>16</sup> National Statistics (30/11/05) *Statistical Bulletin – Statistics on Commuting in Wales* (all figures are based on Annual Population Survey 2004)

that working patterns in Bridgend become more self-contained, raising the percentage of residents who work in the County Borough. Although the Wales Spatial Plan shows that Bridgend has a supporting role to neighbouring authorities, particularly Cardiff, the LDP should seek to ensure that these movements are made by sustainable modes of transport.

### **Tourism**

3.3.30 Tourism is a growing part of the local economy<sup>17</sup>. Hence, the tourism potential of Bridgend County Borough is very important and significant in providing continued economic and environmental benefits. It is important to continue to encourage and increase the number of overnight visitors to the area who are likely to spend more than day trippers. To assist in this, proposals for new tourism related development will be supported by the Council. This should lead to the widening of the range of attractions and facilities available, thereby attracting more visitors and increasing income generation and employment opportunities.

3.3.31 The adopted UDP identifies that there are difficulties in collecting data and estimating precisely the value and volume of tourism in Bridgend. However, Bridgend County Borough Council has adopted the STEAM (*Scarborough Tourism Economic Activity Monitor*) methodology. This is a computer based analysis package which aims to quantify the value and volume of tourism. The assessment for Bridgend for 2004 indicated that approximately 3,319 full time equivalent jobs are directly provided in tourism, with another 1,349 indirectly provided. There are some 3,670,000 visitors to the County Borough per annum although approximately 85 percent of these are day visitors only. 157,000 visitors stayed in serviced accommodation, 191,000 visitors stayed in non-serviced accommodation and 201,000 persons stayed with friends and relatives. The overall expenditure by visitors to Bridgend County Borough was about £236 million. For Porthcawl, the main holiday destination in the County Borough, STEAM analysis found that there were 1,105 full time equivalent jobs provided directly and indirectly by tourism. With 912,000 visitors to Porthcawl; the overall expenditure by visitors to Porthcawl was £59.2 million of which £12.2 million went on accommodation.

### ***Implications for the plan***

3.3.32 The LDP in partnership with other strategies for the area should help to increase the tourism visits and spend in Bridgend. Increasing the spend of tourists is the key to a more sustainable approach to tourism, as this would not necessarily require an increase in the number of overall visitors, with potential negative impacts such as visitor pressure on the environment, and an increase in car travel. This can be achieved through the LDP by ensuring appropriate policies are in place to support tourism facilities, and particularly those that would bring more value to the economy and encourage overnight stays. Although this needs to be subject to appropriate environmental limitations, including development within existing towns and villages rather than in the open countryside. Notwithstanding this, some tourism activities require a countryside location by virtue of their nature, e.g. equestrian and outdoor pursuits, and the Plan will also make appropriate provision in these regards.

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<sup>17</sup> This is reflected in the current STEAM figures for the area (see para. 3.3.31 above) and the newly published 'Good Practice Guide on Planning for Tourism' (Dept. for Communities and Local Government (May 2006)).

#### **4 Other plans and strategies informing the Sustainability Appraisal**

- 4.1 It is the nature of local planning that there exists additional and overlapping policy at various levels that must be taken account, as well as legislative and procedural requirements at other levels of government. The LDP will aim to not just implement local policy objectives but deliver land use policy for Wales as well as take account the policies from national agencies and partner organisations.
- 4.2 Many other documents prepared by the local authority and others provide context for the LDP – in the form of objectives that the LDP should help to meet, or complementary material in the form of policies and programmes.
- 4.3 In addition to local level plans and strategies a large amount of guidance on development planning comes from the Wales level, in the form of Planning Policy Wales and the Technical Advice Notes (TANs), published by the Welsh Assembly Government.
- 4.4 It is important for the LDP and the SA alike to take on board the messages from these documents in order to ensure that a unified approach is taken to the development of the plan area. For the SA, the way that these can be best taken into account in the appraisal process is by ensuring there are relevant objectives in the Sustainability framework for each matter.
- 4.5 The rest of this section sets out many of the main plans and guidance that will have relevance to the preparation of the LDP to the extent of considering what sustainable development objectives have been set and how these may be met through the LDP.
- 4.6 It is important to acknowledge that many other documents, guidance notes and policies are for the LDP rather than the SA to take into account. The coverage of plans and strategies is kept to a reasonable level of detail to make the process manageable.

##### **International policies**

- 4.7 The SA takes into account policies set at an international level, both those set by the United Nations, such as the Kyoto Protocol, 1992 on climate change and the need to limit greenhouse gas emissions, as well as the environmental legislation from the European Commission, outlined below.
- 4.8 The EC Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna 92/43/EEC – considers the conservation of flora and fauna and on a network of protected areas in Europe, including special protection areas.
- 4.9 The Water Framework Directive 2000/60/EC – considers sustainable water use and water quality protection in river catchments. The Environment Agency has a duty to prepare River Basin Management Plans (in consultation and liaison with various stakeholders) to implement the Directive. Bridgend County Borough falls within the 'Western Wales River Basin District' (RBD) the management plan for which is at early stage of preparation by the Environment Agency – Wales).



- 4.10 The Air Quality Framework Directive 92/62/EC – seeks to control air pollution.
- 4.11 Various waste management Directives including the Landfill Directive 99/31/EC – seek the more sustainable management of waste, including setting targets for recycling rates of waste, with implications for general waste management policies.

#### **United Kingdom Government Policies**

- 4.12 The United Kingdom 'Biodiversity Action Plan' (1994) is the overall action plan for habitat and species protection in the UK, this is translated locally in Bridgend, in the approved Local Biodiversity Action Plan. In addition, the pre existing Development Plan and Supplementary Planning Guidance (SPG) can provide a reciprocal role in informing SA of the new LDP.
- 4.13 The United Kingdom 'Waste Strategy' (2000) sets a vision for the approach to waste management in the UK, including targets for reducing industrial and commercial waste to landfill to 85% of 1998 levels by 2005, and recycling 30% of household waste by 2010. Therefore the LDP needs to ensure that it promotes the more efficient use of resources.
- 4.14 The 'Air Quality Strategy for England, Scotland, Wales and Northern Ireland' (2000), includes the need to improve air quality, and sets specific targets for this.
- 4.15 'A Better Quality of Life; A strategy for sustainable development in the United Kingdom' (1999) and the updated strategy 'Securing the Future' (2005) set out the UK wide sustainable development agenda.

#### **Welsh Assembly Government policies and strategies**

- 4.16 The key documents are 'Planning Policy Wales (2002) and Minerals Planning Policy Wales (2000) which' outline the principles and aspirations for planning and mineral planning policies of the Welsh Assembly Government (WSG). The promotion of sustainable development is a central consideration of both documents.
- 4.17 The way that the land use planning system can be used to contribute to achieving the above, and WAG's other strategic objectives with respect to the economy, overcoming social disadvantage, and seeking equal opportunities is set out in thematic sections in Planning Policy Wales. Sustainable development will therefore be a key priority for the policies of the LDP.
- 4.18 From time to time, the policy advice contained in Planning Policy Wales is updated and amended in the form of Ministerial Interim Planning Policy Statements (or MIPPS). To date, 3 have been issued by WAG dealing with 'Planning for Renewable Energy' (2005), 'Planning for Retailing and Town Centres' (2005), and 'Housing' (2006) respectively. More recently a Draft MIPPS has been released on Planning, Health and Well-Being (02/2006).
- 4.19 The 'Wales Spatial Plan' (November 2004) is the national spatial plan for Wales. Bridgend falls in the transitional zone between South East Wales, 'the Capital Network', which is Wales' most populous region, and the Swansea Bay area. For most planning purposes waste issues excepted, Bridgend relates to the South East Wales area. This area is characterised by major economic and social disparities. As the main economic driver of Wales the

emphasis is on creating a coherent urban network where all of Wales is able to benefit from its prosperity.

4.20 The Welsh Assembly Government's 'Environmental Strategy for Wales' (2006) outlines its long term comprehensive strategy for the protection of the environment of Wales. LDP's will be expected to have regard to the strategy as it attempts to protect and conserve Wales' distinctive habitats and landscapes while considering climate change. The Strategy focuses on 5 key environmental themes:

- Addressing climate change – (which) covers mitigation and adaptation.
- Sustainable Resource use – covers materials consumption and waste; water; soils; minerals and aggregates.
- Distinctive Biodiversity, landscapes and seascapes – covers biodiversity; the marine environment; landscapes and seascapes and their historic component.
- Our local environment – covers the built environment and access to green space; environmental nuisances; walkability in urban areas and access to the countryside and coast; and flood risk management. (and)
- Environmental hazards – covers pollution and chemicals and radioactivity.

4.22 The full suite of Technical Advice Notes has been referred to in order to inform the SA of the LDP. However, TANs with particular inference to the SA process are set out below. Some of these are in the process of being updated to more closely accord with the WAG's policies expressed through Planning Policy Wales (2002) and its strategies for a sustainable future for Wales particularly in respect of health and well-being and our environment.

- Technical Advice Note 1 – Joint Housing Land Availability Studies (2006), which provides guidance on the preparation of annual studies, the purpose of which is to monitor market and affordable housing to ensure that sufficient land is genuinely available to provide a 5 year supply of housing.
- Technical Advice Note 2: Planning and Affordable Housing (2006). This provides practical guidance on the role of the planning system in delivering affordable housing, stressing the need for planning and housing authorities to work together in participation with stakeholders to undertake local housing assessments. The Guidance requires Local Planning Authorities to identify an affordable housing target, indicate how that will be achieved and monitor its provisions taking action where necessary to ensure the target is met.
- Technical Advice Note 4: Retailing and Town Centres, (1996). This offers practical advice on policy formulation for town centres and retail including, needs assessments, general principles and car parking standards.
- Technical Advice Note 5: Nature Conservation and Planning, (1996). This gives detailed advice on protection and designation of Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). TAN 5 also looks at SSSI's and Local Nature Reserves (LNRs). Nature conservation outside of statutory sites and areas is also advised, namely

in Sites of Importance for Nature Conservation (SINCs) and Regionally Important Geological Sites RIGS. Protecting and conserving nature generally is also discussed in TAN 5. A Draft Revision of TAN5 was published in 2006 the aim of which is to update the TAN in line with the strategic policy set out in Planning Policy Wales (2002). A more recently published Draft Annex to the TAN addresses the assessment of Development Plans in Wales under the provisions of the Habitats Regulations.

- Technical Advice Note 6, Agricultural and Rural Development (2000). This outlines policy and guidance on rural, specifically agricultural and rural economic affairs. The TAN includes guidance on farm development and diversification, the re-use and conversion of rural buildings, forestry and development involving horses.
- Technical Advice Note 8, Renewable Energy (2005). This has specific land use implications for all forms of development of renewable energy sources including those for onshore wind energy. The LPA along with the neighbouring County Boroughs of Neath Port Talbot and Rhondda Cynon Taff (et al) have commissioned ARUP and partners to produce a Study to recommend refinement of Strategic Search Areas for major on-shore wind energy developments. The findings of the Study will inform future proposals in the LDP.
- Technical Advice Note 12, Design, (2002). This includes important advice on many aspects of urban and building design. The TAN covers a wide range of issues important to general sustainability including; inclusive design, transport and movement, landscape, biodiversity, urban regeneration, the public realm, public buildings, public art, the historic environment, housing design and layout, employment and commercial areas, rural areas, resource efficient buildings, and design and public safety.
- Technical Advice Note 13, Tourism, (1997). This encourages good planning with regard to tourism and the promotion of sustainable tourism. A Draft Revision of TAN13 was published in 2006 the aim of which is to update the TAN in line with the strategic policy set out in Planning Policy Wales (2002).
- Technical Advice Note 14, Coastal Development, (1998). This encourages well designed, and sustainable development where appropriate on the coast and in coastal areas.
- Technical Advice Note 15, Development and Flood Risk, (2004). This provides Guidance to authorities regarding development and flooding, including the need to consider the effects of Climate Change and the use of Flood Risk maps.
- Technical Advice Note 16 Sport and Recreation, (1998). This outlines safeguarding provisions and the development of sport and recreation facilities through the planning system. A Draft Revision of TAN 16 was published in 2006 the aim of which is to update the TAN in line with the strategic policy set out in Planning Policy Wales (2002).
- Technical Advice Note 18, Transport, (1998), gives detailed advice on the policies and procedures regarding planning and transport and concerning new infrastructure. It has guidance, on walking, cycling, as well as inland waterways and public transport. A Draft Revision of TAN18 was

published in 2006 the aim of which is to update the TAN in line with the strategic policy set out in Planning Policy Wales (2002).

- Technical Advice Note 20, The Welsh Language - Unitary Development Plans and Planning Control, (2000), encourages planning authorities to fully take account of the effects of Plans on the Welsh Language, specifically advertising and other controls.
- Technical Advice Note 21, Waste (2001). This is intended to facilitate the introduction of a comprehensive, integrated and sustainable land use planning framework for waste management in Wales.
- Minerals Technical Advice Note (MTAN)1: Aggregates (2004)
- Minerals Technical Advice Note (MTAN)2: Coal issued in Draft form (2006).

As further Draft Revised or Final TANs and / or Regulations or Circulars are issued by WAG over the course of Plan preparation, these too will inform the SA of the LDP where appropriate.

### **Local and Regional Policy**

- 4.23 There are several other Local and Regional Plans and Strategies which will influence the preparation of the LDP. Those referred to below are not intended to be a complete list of plans, or a definitive account of their contents. Rather, it is intended to indicate those areas of Plans and Strategies upon which SA of the LDP will principally focus. Other Plans and Strategies or their revisions may also arise during the preparation of the LDP, especially those LDPs of neighbouring local authorities which are proceeding through the same process but are at different stages of preparation.
- 4.24 As a strategic issue, TAN 21 introduced 3 regional waste areas for Wales. Bridgend is located in the South West Wales region with, Swansea, Carmarthenshire, Pembrokeshire, Ceredigion and the Pembrokeshire Coast, Brecon Beacons National Park and Neath Port Talbot.
- 4.25 These authorities have produced a Regional Waste Strategy (2003), one of whose aims is to provide a land use-planning framework to enable individual authorities in the region to allocate sites in their development plans for new waste management facilities.
- 4.26 Neath Port Talbot County Borough Council, is the authority to the north and west of the County Borough. The Neath Port Talbot UDP Public Inquiry officially closed in August, the inspectors report is due later in 2006. The proposed plan, makes an effort to separate the two County Boroughs and retain their distinctiveness through Green Wedge policies in the south west of the County Borough where the developed area of Bridgend abuts. In the more rural north east of the County Borough, rural development policies protect the area from development. Neath Port Talbot has suffered from population loss over a period of years. The strategic aims of the UDP are to halt this trend and encourage regeneration and development within town and village centres.
- 4.27 The Vale of Glamorgan County Borough has an adopted UDP (2005) and has commenced the earliest stages of producing a LDP. The Vale is an area of high quality farmland and attractive townscapes. The area also has a number

of tourist attractions. The UDP concentrates on maintaining and enhancing the Vale's landscape and townscape and concentrating on improving pockets of deprivation.

- 4.28 Rhondda Cynon Taf County Borough, which borders Bridgend to the east and north has also commenced the earliest stages of producing a LDP. The authority's existing Development Plan emphasises the need for economic regeneration and improvements to access in the northern uplands part of the authority area.
- 4.29 In addition to Bridgend County Borough Council all three authorities are responsible for public transport and highways in their respective areas. However as outlined in 3.2.56 SEWTA and SWWITCH, made up of their respective local authorities largely consider the strategic issues and major investments in each region. The Rhondda Cynon Taf local improvement plan is a cross cutting plan for regeneration and improvement.
- 4.30 One of the most important documents to be considered in LDP preparation and its SA is the **Community Strategy**. The Bridgend Community Strategy has been produced through the Bridgend Local Strategic Partnership and provides an overarching framework for all other strategies in the County Borough, including the Local Development Plan.
- 4.31 The Community Strategy's vision for Bridgend is,
- "To steer the County Borough's natural, human and financial resources to help residents lead independent lives to the full".*
- 4.32 The Strategy is divided into six key themes; quality of life, the environment, prosperity, safer communities, health and inclusion.
- 4.33 Although most of the aims and sub-objectives of the Community Strategy will bear some relationship with the aims of sustainability, some will have specific reference to the LDP and sustainability issues. In this respect, these six key themes are:
- quality of life; the LDP should be expected to improve the overall quality of life for people in the County Borough through improvements to the built and semi natural environment and detailed design and layout of developments
  - the environment; the LDP can help to protect and enhance the built and natural environment. The Plan will also have a role to play in increasing the amount of waste that is recycled, Also it can assist in creating a higher proportion of energy from sustainable sources.
  - prosperity; the LDP can help to create a mix of employment sites in good and accessible locations as well as protect existing employment sites from higher value land uses. Through its policies the Plan can also help to secure new infrastructure investment opportunities.
  - safer communities; through its policies the LDP can encourage good design of new developments and improvements of existing ones, reduce crime and fear of crime, as well as aim to reduce the potential for accidents..

- health; the LDP can encourage sport and activity through promotion and protection of open space. The Plan also has an essential role to play in providing affordable housing and providing opportunities for enhanced health care provision.
  - inclusion; a specific way in which the LDP could contribute to this objective is through ensuring a good mix and sufficient amount of housing of all tenures and types. A mix of tenures and sizes in new development should be sought and accessibility for all considered.
- 4.34 The approved **Bridgend Sustainable Economic Regeneration Strategy (2003)** sets out the long term aims and objectives for the economic development of the County Borough in the form of a 10 – 15 year agenda. It is accompanied by a three year Action Plan. It focuses on an ‘ambitious and innovative’ vision for the County Borough providing fresh direction for inward investment within the context of the Wales Spatial Plan. It incorporates a ‘Sustainability Index’ against which projects and proposals are evaluated.
- 4.35 **The Local Housing Strategy (2004)** has a number of key priorities which include improving the condition, suitability and energy efficiency of existing housing; making use of vacant properties, preventing and reducing homelessness; providing affordable housing and meeting the needs of people with special housing requirements; engaging in community regeneration and encouraging ‘Living in the Town’ initiative. The Welsh Assembly Government is however currently consulting on the need to provide a replacement Local Housing Strategy by 2007, which will need to consider the local housing system, land-use planning framework, market and affordable housing, energy efficiency, housing for vulnerable groups and community regeneration.
- 4.36 **The Health Social Care and Wellbeing Strategy (2005-2008)**, was jointly prepared by the Council’s Housing and Community Well-being Division, Bridgend Local Health Board and others – collectively known as the Bridgend Partnership Board. It considers the means of identifying and addressing unmet health, social care and well-being needs of the County Borough.
- 4.37 The approved **Bridgend County Tourism Strategy (2002-06)** provides an agreed strategic framework that reflects the views of the tourism industry, and aims to develop, co-ordinate and manage tourism in order to maximise its benefits to the local economy whilst minimising any adverse effects on local communities and the environment.
- 4.38 Bridgend County Borough Council has an approved ‘**Local Biodiversity Action Plan**’ (LBAP). The plan outlines important baseline information for biodiversity in the area and how areas of high biodiversity value are to be protected and improved.
- 4.39 The LBAP for Bridgend has a number of direct implications for the LDP and is a major consideration for the SA. The main land use implications of which are protecting and where possible enhancing biodiversity through development and addressing the demand for development whilst protecting biodiversity.
- 4.40 **The Bridgend County Borough Council Draft Single Education Plan 2006-2008**. This identifies the Council’s priorities, strategies and targets for its education provision for the ensuing 2 years. It succeeds earlier strategies and seeks to integrate with the former School Organisation Plan, Early Years

Development Plan and Behaviour Support Plan. It should have relevance in this respect to the SA of the LDP, and to the plan proposals themselves.

- 4.41 The '**Countryside Strategy for Bridgend** (2002). This provides a strategic framework for the sustainable development and management of countryside and urban green spaces in the County Borough. It outlines a number of objectives and principles which the LDP should consider when it deals with the countryside and urban green space issues.
- 4.42 The '**Swansea Bay Shoreline Management Plan**' (2005). This Plan will have specific implications for where development can and cannot take place along the shoreline in the County Borough and the overall strategy for management of and development around its shoreline.
- 4.43 The '**Local Transport Plan**' 2005–2010. This outlines the transportation policies of the authority. The Bridgend LTP was originally approved in 2001. The LTP is the mechanism for bringing together a wide range of practical measures to produce a comprehensive integrated transportation strategy and sets out the key transport-related goals and priorities for the Council for the period 2005/06 to 2009/10. It will be replaced during the Plan period of the LDP by the South East Wales Regional Transport Plan which is being prepared by SEWTA.

## 5 The sustainability objectives

- 5.1 The objectives proposed for use in the 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 will be relevant to the LDP for Bridgend, taking into account other plans and strategies as well as the baseline sustainability considerations (section 3). The previous sustainability objectives used in the appraisal of the UDP were developed in consultation with officers of the LPA. The objectives are a key part of the consultation process on the scoping report, as it is important that those consulted agree that these are the main sustainability issues facing Bridgend. The set of sustainability objectives that will be used in the SA process have taken into account comments made upon the Draft Scoping Report where relevant.
- 5.2 The sustainability objectives are based on an understanding of sustainability as:
- that natural resources should be efficiently used so that future generations can meet their needs
  - that access to resources for some should not be denied by the actions of others now and in the future.
- 5.3 To use these objectives in examining a land use or spatial plan however, something more specific is needed, and we use the idea of a sustainability framework as establishing a common understanding of what it means to achieve greater sustainability amongst those involved with examining a plan.
- 5.4 The original sustainable development strategy of the UK Government, sustainable development strategy, 'A Better Quality of Life' (May 1999): adopted four objectives, namely:
- 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.
- 5.5 This approach has been updated following the publication of the new UK strategy for sustainable development 'Securing the Future'. This was produced in conjunction with the UK shared strategy framework 'One future – different paths' (March 2005) which states that the goal of sustainable development:
- '...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'*



- 5.6 Hence, 'Securing the Future' the new Sustainable Development Strategy sets out five guiding principles that replace the former four aims of the older strategy, as quoted in paragraph 5.4. 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
- 5.7 However, the headings used in the 1999 Strategy will continue to be used in this appraisal as they are a more useful way of organising the Sustainability Framework for the LDP.
- 5.8 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. It 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. Quantifying each of these objectives, and developing relevant indicators is difficult 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 for it 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. It may however be possible to update these objectives with targets by the time the SEA of the LDP occurs, and as part of the monitoring process.
- 5.9 The objectives presented in Figure 5.1 take the form of a 'headline' which expresses what matter the objectives relate to. This is followed by the objective itself which sets out what the Plan should be promoting in terms of achieving more sustainable development. These are each accompanied by a set of ways the Plan may directly impact on the objectives. These are only intended as examples as there are other ways the Plan can fulfil the objective, and they are intended to better describe the objective and its relationship to an LDP. These objectives have been developed using information from other plans and strategies in the area, in particular, the Bridgend County Borough Community Strategy 2005-2016.

Figure 5.1 The sustainability framework for the Bridgend LDP

<b>Concern</b>	<b>Objective</b>	<b>Supporting objectives</b>
<b>Social progress which recognises the needs of everyone</b>		
Accessibility	<b>To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough.</b>	<ul style="list-style-type: none"> <li>• Promote sustainable transport infrastructure, and integrated transport approaches</li> <li>• Implement an access hierarchy, putting pedestrians at the top and car users at the bottom</li> <li>• Promote alternative modes of transport where feasible.</li> <li>• Ensure all have access to essential facilities and services, by a variety of modes of transport</li> <li>• Reduce reliance on the car for transport</li> <li>• Reduce existing disparities to access to services, decent homes and jobs</li> </ul>
Housing	<b>To provide the opportunity for people to meet their housing needs</b>	<ul style="list-style-type: none"> <li>• Meet the housing requirements of the area in ways which help build sustainable communities</li> <li>• Provide affordable housing to meet identified needs</li> <li>• Help provide good quality housing throughout the County Borough</li> </ul>
Health, safety and security	<b>To improve overall levels of health and safety, including the sense of security, for all in the County Borough</b>	<ul style="list-style-type: none"> <li>• Improve access for all to good quality health services for planned and emergency healthcare, leisure and social facilities</li> <li>• Enhance opportunities for healthy living and empower people to take responsibility for their own health – including improving access to open space</li> <li>• Encourage people to reduce car use, and travel by walking and cycling</li> <li>• Encourage new development to be designed for security and safety principles</li> </ul>
Community	<b>To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend</b>	<ul style="list-style-type: none"> <li>• Strengthen community spirit and wellbeing</li> <li>• Challenge anti-social behaviour by creating an environment where it is difficult for such behaviour to flourish</li> <li>• 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</li> </ul>
<b>Effective protection of the environment</b>		
Biodiversity	<b>To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value</b>	<ul style="list-style-type: none"> <li>• Conserve the local biodiversity as a result of land management and flood management</li> <li>• Conserve areas designated for national and international biodiversity significance</li> <li>• Protect and enhance habitats wherever possible, and help contribute towards biodiversity</li> <li>• Ensure new development avoids the further fragmentation of habitats, and the destruction of movement routes for flora and fauna</li> <li>• Help implement the Local Biodiversity Action Plan actions and/or targets</li> </ul>
Landscape	<b>To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements</b>	<ul style="list-style-type: none"> <li>• Protect and enhance the County Borough's urban, rural and coastal landscapes and to maintain and increase access to open space</li> <li>• To instil in local communities, a pride in their surroundings</li> <li>• Will it help to protect areas identified for their historic landscape importance</li> <li>• To bring the natural environment under positive management, including natural habitats, the historic built and natural environment and land environment meeting national quality standards.</li> </ul>
Built Environment	<b>To maintain and enhance the quality of</b>	<ul style="list-style-type: none"> <li>• Protect and enhance sites, features and areas of historical, archaeological, architectural and cultural value and their</li> </ul>

	<b>the built environment, including the cultural/historic heritage</b>	<p>setting, including features of local cultural significance</p> <ul style="list-style-type: none"> <li>• Encourage and support specific improvement projects</li> <li>• Maintain and enhance the built quality of settlements</li> <li>• Ensure that the County Borough remains a region of diverse and distinctive heritage and landscape</li> <li>• Ensure the most appropriate design advice and guidance is made available in connection with proposals for development to enhance built environment quality</li> </ul>
<b>Prudent use of natural resources</b>		
Air	<b>To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere</b>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Ensure all new development takes into account the need to maintain and improve residential amenity</li> </ul>
Climate change	<b>To ensure that new development takes into account the effects of climate change</b>	<ul style="list-style-type: none"> <li>• Avoid development from being located in areas at substantive risk from fluvial flooding, including incorporating sustainable drainage systems in new development where appropriate</li> <li>• Take into consideration the risks of storm surges and sea defences being overtopped when planning new development in areas of risk from tidal flooding</li> <li>• Ensure development is constructed with high energy efficiency standards to reduce energy consumption</li> <li>• 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</li> </ul>
Water	<b>To maintain and improve the quality and quantity of ground waters, river waters and coastal and bathing waters</b>	<ul style="list-style-type: none"> <li>• New development should be constructed so as to ensure that water is used efficiently</li> <li>• Improve and maintain coastal bathing waters at Rest Bay and Porthcawl, and transitional waters at Ogmores-by-Sea</li> <li>• Protect water bodies from pollution, for example by ensuring there is sufficient suitable waste water treatment infrastructure</li> </ul>
Land / Soil	<b>To use land efficiently, retaining undeveloped land and bringing damaged land back into use</b>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Protect soil of higher agricultural grades from development</li> <li>• Ensure that appropriate remediation of contaminated sites is undertaken prior to development</li> </ul>
Minerals and waste	<b>To maintain the stock of minerals and non renewable primary resources</b>	<ul style="list-style-type: none"> <li>• Ensure mineral resources are used efficiently and with the least environmental damage</li> <li>• Ensure the recycling and reuse of building materials wherever possible, such as for aggregate, in preference to primary mineral resources</li> <li>• Reduce use of primary resources through providing appropriate sites for sustainable waste management, including re-processing, recycling and sorting</li> </ul>
Renewable energy	<b>To increase the opportunities for energy generation from renewable energy sources</b>	<ul style="list-style-type: none"> <li>• Promote the generation of energy from renewable sources</li> <li>• Ensure that, where appropriate, new developments generate a proportion of their energy from renewable sources on site</li> </ul>
<b>Maintenance of high and stable levels of economic growth and employment</b>		
Employment	<b>To ensure that there is a vibrant local economy which is at the forefront of a wider regional economy and provide diversity of employment</b>	<ul style="list-style-type: none"> <li>• Maintain a motivated, highly skilled and well educated workforce</li> <li>• Improve access to employment for all residents of County Borough, and help reduce disparities</li> <li>• Provide an infrastructure of transport, communications and land development, which attracts and retains local</li> </ul>

	<b>within the County Borough and support a culture of entrepreneurship</b>	businesses. <ul style="list-style-type: none"> <li>• Ensure Bridgend continues to be a ‘working district’, providing diverse job opportunities for local people</li> </ul>
Wealth creation	<b>To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity</b>	<ul style="list-style-type: none"> <li>• Achieve economic benefits resulting from tourism</li> <li>• Ensure necessary infrastructure to support a sustainable economy</li> <li>• Maintain a coherent and successful range of business support that is widely available and assists the competitiveness of local companies and local supply chains</li> </ul>

## 6 Scoping and the involvement of the consultation bodies

- 6.1 Para.12(5) of the SEA Regulations includes the statement that *'when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.'*
- 6.2 In this case the 'responsible authority' is Bridgend County Borough Council, and the 'consultation bodies' are identified in the Regulations as:
- Countryside Council for Wales (CCW)
  - Cadw
  - Environment Agency - Wales.
- 6.3 Local Development Plans Wales (2005) paragraph 5.2 indicates that the scoping report is intended for the three environmental consultation bodies identified in the SEA Regulations (Wales) as well as stakeholders, making clear that these bodies are responsible for ensuring that the Council have identified the sustainability issues in the LDP area appropriately through their consultation responses on the Scoping Report.
- 6.4 Some of the matters in the SEA Regulations relate strongly to the specific remit of the consultation bodies identified in the Regulations, and this shown in Figure 6.1.

Figure 6.1 Roles of the Consultation Bodies

Consultation body	Environmental issues identified in the SEA Directive within the remit of the consultation body
CCW	Biodiversity, largely in the form of significant habitats, and vulnerable species. Landscape designations and possibly landscape character.
Cadw	Cultural heritage including architectural and archaeological heritage.
Environment Agency Wales	Soil, water (groundwater, freshwater bodies and the sea), air quality and climatic factors.

- 6.5 As this SA does not solely concern the environment, but includes social and economic issues, widening the consultees at this stage to include other relevant stakeholders is both appropriate and desirable. This includes representatives of other departments within the County Borough Council and other bodies, as referred to in the Community Involvement Scheme in the Delivery Agreement for the LDP. Although it is only the three 'Consultation Bodies' that have a statutory duty to make a response to the SEA of the Plan.
- 6.6 In this Scoping Report we are seeking the opinions of and response from the Consultation Bodies in respect of:
- the proposed methodology of the SEA, and any other matters that should be included
  - the baseline sustainability characterisation, and whether all relevant issues have been identified; whether the information is accurate, and guidance on sources of additional information where there appear to be gaps or errors

- the proposed sustainability objectives for use in the SEA of the Plan, whether all appropriate directions of change have been identified, or where they could be quantified
- plans, programmes, strategies etc that contain environmental and sustainability objectives that would be of relevance to the LDP.

## Appendix 1

### Key Sources of Baseline Information

Bridgend Biodiversity Partnership (2002) *A biodiversity action plan*

Bridgend County Borough Council (May 2005) *Unitary Development Plan*

Bridgend County Borough Council (November 1998) *Development and Management of Children's Play Areas*

Bridgend Local Health Board and Bridgend County Borough Council (November 2003) *Health, Social Care and Wellbeing: assessment of need for Bridgend County Borough – Summary*

Bridgend Local Health Board (April 2004) *An integrated healthcare strategy for primary care premises* Issue no 3

Bridgend Local Strategic Partnership *Bridgend County Borough Community Strategy 2005-2016*

Cadw *Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales*

Environment Agency Wales (2001) *Water Resources for Wales: a strategy for the future*

Environment Agency website [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk) 'What's in your backyard?' section

Environment Agency – [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk) Flood maps

European Council Directive (92/43/EEC) on the Conservation of natural habitats and of wild fauna and flora

WAG (2004) Agricultural Small Area Statistics

Intergovernmental Panel for Climate Change (2001) *Climate Change 2001: Synthesis Report*

Local air quality management [www.airquality.co.uk](http://www.airquality.co.uk)

The National Assembly for Wales (2001) *Climate Change Wales: Learning to Live Differently*

National Statistics (30/11/05) *Statistical Bulletin – Statistics on Commuting in Wales* (all figures are based on Annual Population Survey 2004)

South Wales Regional Aggregate Working Party (2003) Annual Report 2003

South West Wales Regional Waste Plan (2002) *Strategic Assessment Report*

South West Wales Regional Waste (2003) *Regional Waste Plan for the South West Wales Region*

UK Climate Impacts Programme (2002) *Climate Change Scenarios for the UK: The UKCIP02 Scientific Report*

Welsh Index of Multiple Deprivation 2005

Welsh Language Board *Census 2001: Main statistics about Welsh*



## Appendix 2

### Habitats identified in the Local Biodiversity Action Plan

The following habitats are those that are identified in the Local Biodiversity Action Plan, and for each the threats are listed as they appear in the Action Plan, over which the LDP may have some influence.

#### **Ancient and/or species-rich hedgerows**

- removal of hedges and/or hedgebanks for road widening
- loss of large networks of hedgerows as a result of planning permissions for new developments (e.g. housing, business and retail parks, road schemes etc)

#### **Lowland ancient woodlands**

- clearance of woodlands for development, including residential and business developments, road schemes, quarrying etc
- fragmentation of woodlands leading to the creation of small 'islands' of habitat which are inherently less biodiversity rich and more vulnerable to deterioration and loss of species
- inappropriate and damaging recreational use, including paint-ball, car rallying, motorbike scrambling
- climate change and atmospheric pollution leading to changes in the vegetation composition, loss of specialised lichens and invertebrates etc.

#### **Upland oak woodlands**

- atmospheric pollution and global warming: deteriorating air quality is a threat especially to rare and characteristic lower plants and lichens
- economic development pressures, which may lead to clearance
- fragmentation of woodlands leading to the creation of small 'islands' of habitat which are inherently less biodiversity rich and more vulnerable to deterioration and loss of species

#### **Upland mixed ash woodlands**

- quarrying: many of the remaining woodlands lie on commercially valuable limestone
- climate change and atmospheric pollution leading to changes in the vegetation composition

#### **Wet Woodlands**

- habitat loss to development for housing, business and industrial sites, road schemes etc.
- lowering of water tables through increased abstraction, resulting in succession to 'dry' woodland types
- hydrological changes resulting from flood prevention and river engineering measures
- climate change and atmospheric pollution leading to changes in the vegetation composition

#### **Lowland wood pasture and parklands**

- loss through change of use, including development such as housing or golf courses

- changes to ground-water levels leading to water stress and tree death, resulting from abstraction, drainage, neighbouring development, roads, drought and climate change
- isolation and fragmentation of remaining parklands and wood-pasture sites in the landscape

#### **Hay meadows and old pastures**

- loss of habitat to industrial, residential and road scheme developments, opencast mining, land reclamation schemes, landfill operations and tipping
- remaining sites are often fragmented and isolated, creating 'islands; of habitats that are inherently less biodiversity rich and more susceptible to loss of species and deterioration
- planning developments, which affect species-rich grasslands are increasingly being supported by unproven 'habitat translocation' proposals, in which the grasslands of interest are lifted and moved to another location. These schemes are usually poorly designed and executed, and gathering research evidence indicates a poor rate of success even where the operations are carried out to a high standard.

#### **Lowland dry grassland**

- loss of habitat to industrial, residential and road scheme developments, opencast mining, land reclamation schemes, landfill operations and tipping
- remaining sites are often fragmented and isolated, creating 'islands; of habitats that are inherently less biodiversity rich and more susceptible to loss of species and deterioration

#### **Calcareous grasslands**

- loss of habitat to industrial, residential and road scheme developments, opencast mining, land reclamation schemes, landfill operations and tipping
- loss of habitat to quarrying: many sites lie on commercially significant limestone reserves
- remaining sites are often fragmented and isolated, creating 'islands; of habitats that are inherently less biodiversity rich and more susceptible to loss of species and deterioration
- planning developments, which affect species-rich grasslands are increasingly being supported by unproven 'habitat translocation' proposals, in which the grasslands of interest are lifted and moved to another location. These schemes are usually poorly designed and executed, and gathering research evidence indicates a poor rate of success even where the operations are carried out to a high standard.

#### **Heathlands**

- development, particularly new roads and road widening schemes, housing and business park development, mineral extraction and infrastructure scheme. Many secondary heathland sites are targeted for 'land restoration' either to agriculture or for redevelopment
- recreational pressure, including dog-walking

#### **Purple moor-grass and rush pastures**

- industrial, residential and road development; many sites have been lost or fragmented by developments, the fragmented site often suffering

deterioration through disrupted drainage regimes, and cessation of traditional management

#### **Coastal and floodplain grazing marshes**

- development for minerals or aggregate abstraction
- increased groundwater abstraction leading to a lowering of the water table
- industrialisation, road building and rapid spread of urban areas
- inappropriate flood defence work

#### **Reedbeds**

- loss through development, including residential, business and road schemes

#### **Fens and flushes**

- increased water abstraction from underlying aquifers also results in drying-out or reduction in the water flow from the spring lines, lowering of water tables, and changes in water quality

#### **Blanket bog**

- atmospheric pollution, especially by sulphates and nitrates, can cause changes in bog vegetation, with the loss of some sensitive moss and other species
- development (e.g. housing, industrial and road schemes) is a problem especially in the lowlands, although some upland sites are also threatened by wind-farm and hydroelectric schemes

#### **Coastal sand dunes**

- loss through development, especially for industrial and commercial uses, and waste tipping
- falling water tables

### Appendix 3: Bridgend Sustainability Appraisal Baseline Report: Record of changes made to scoping resulting from consultation

This Appendix contains summarised comments. The actual representations made upon the Draft Scoping Report (July 2006) are available from Bridgend County Borough Council and can be viewed at [www.bridgend.gov.uk](http://www.bridgend.gov.uk).

Respondent	Comments (paragraph numbers refer to consultation version of the Scoping Report)	Response
<p>Countryside Council for Wales</p>	<p>General comments:</p> <p>Appropriate assessment            Conclusions should not be drawn at this stage that the LDP will have no impact on the European designated nature conservation sites in Bridgend. The approach to this should be improved with separation from the rest of the report and reference from within the baseline.</p> <p>Format of the report            The report follows the sustainability appraisal headings and may lead to difficulties of interpretation. The sustainability framework may not be sufficiently robust in terms of SEA. In addition it must be robust enough to take into account a range of impacts.</p>	<p>Appropriate assessment            The wording of the section on appropriate assessment will be changed to reflect that this is an ongoing process of assessment, and successive iterations of the LDP will be appraised for their likely impact on these designated areas. In future reporting stages of the SA the appropriate assessment will be presented in its own section, to reflect the separation of this issue from the rest of the SA.</p> <p>Format of the report            Whilst it is important to reflect on the interaction between different topics, it is necessary for some division to make reporting possible and this is the reason for topic separation. The comments made for each matter do reflect the interaction between topics to some extent. The sustainability framework covers the matters expected by the SEA Regulations, with the addition of additional criteria to fulfil the Planning Act requirements of sustainability appraisal. Consideration of the range of impact the LDP can have (e.g. long term, cumulative etc.) will be part of the appraisal process carried out of the LDP during preparation, and will be contained in future reporting stages of the SA.</p>

	<p>Alternatives There is some confusion as to how the assessment of alternatives will be carried out.</p> <p>Community strategy The SA and the Community Strategy should be complementary. The LDP should give spatial expression to the elements of the Community Strategy that relate to the use and development of the land. The priorities of the Community Strategy should be incorporated into the SA/SEA.</p> <p>Specific comments:</p> <ul style="list-style-type: none"> <li>• 1.2 Recommend a change of wording in 1.2, to bring SR more in line with Directive.</li> <li>• 1.3 Change of wording to recognise guidance.</li> <li>• 1.5/1.7 Care must be taken not to 'water down' SEA objectives and the protection of the natural environment, and in the use of 'sustainability'</li> </ul>	<p>Alternatives It is in the nature of preparing an LDP that various options for proceeding with the strategy and proposals of the plan are open to consideration of alternatives. The SA has a vital role to play in assessing these alternatives, as suggested by the Council, in addition to suggesting other approaches that may have more positive sustainability implications. This will be part of future stages of the SA.</p> <p>Community strategy The relationship between Community Strategy and LDP is an important one, and the SA does have a role to play in ensuring the LDP recognises this. Section 4 of the Scoping Report highlights the key matters arising from the Community Strategy in relation to the LDP, and the six key themes are picked up by the sustainability framework.</p> <p>Specific comments</p> <ul style="list-style-type: none"> <li>• Action: Wording changed to add clarity, although this differs in some respects from that proposed by CCW.</li> <li>• Action: Wording changed as proposed by CCW.</li> <li>• The SA recognises the importance of protection of the natural environment. Although all the 'sustainability objectives' will be used in the appraisal process, where it is identified there will be</li> </ul>
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	<ul style="list-style-type: none"> <li>• 1.10, 2.2, 2.5 Re-use of term sustainability.</li> <li>• 2.7 SA must cover all aspects relating to SEA Annex 1; sentence 3, does not outline which alternatives are to be looked at.</li> <li>• 2.7 objectives for sustainable development may not equate to desired/required objective for SEA</li> <li>• 2.9 Suggest an other alternative of 'whether development is appropriate' at all.</li> </ul>	<p>harm to the natural environment, particularly internationally designated nature conservation sites, this will be identified as being particularly significant.</p> <p>The appraisal process itself will not try and identify a balanced approach to seeking solutions – and will identify each individual impact that may arise, it is also for plan makers to ensure that they take the findings properly into account in producing the LDP. An additional paragraph has been added to describe the use of the term sustainability to paragraph 1.5.</p> <ul style="list-style-type: none"> <li>• Action: see comment to 1.5/1.7</li> <li>• Action: This paragraph has been re-written to reflect the process that will be followed. Moving forward with the SA process will clarify exact alternatives to be considered. Visioning, and the generation of alternative strategic options is the next and ongoing stage in LDP preparation. However, prior to this, the LPA is canvassing developers, landowners (including public bodies) and the public regarding 'candidate sites' for potential consideration for development, with a view to producing a 'Site Register'.</li> <li>• The SA objectives do cover those matters in the SEA Directive, and it will be ensured during appraisal that weight is given to the consideration of these objectives.</li> <li>• It is unlikely that this will represent a 'realistic' alternative, as no development would not be possible under national policy – and no development in Bridgend County Borough would only displace development elsewhere, with likely environmental impacts related to increased commuting. Instead a 'business as</li> </ul>
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	<ul style="list-style-type: none"> <li>• 2.12 European level conservation areas. It is important that Bridgend undertake tests of significance on the impact of the plan on Natura 2000 sites. Appropriate assessment needs to be carried out if there are likely to be impacts, or it is not clear there will be no impacts. If the LDP is shown to have an adverse impact that <i>it should not proceed</i>.</li> <li>• 2.13 Add assessment in third sentence, and reference to SEA in fourth bullet</li> <li>• 2.14 Reference to appropriate assessment</li> <li>• 3.6 Where additional information becomes available, this can be added later</li> <li>• 3.11 Landscape value and landscape quality; Clarify LANDMAP; consider woodlands, field systems consider light pollution, tranquillity.</li> <li>• 3.15 Believe section would appear to 'be very weak' in terms of habitats directive.</li> <li>• 3.20 Objectives need to be strengthened in light of the habitats directive.</li> </ul>	<p>usual' approach will be considered.</p> <ul style="list-style-type: none"> <li>• The screening for Appropriate assessment will continue in moving forward with the SA, in order to identify whether it is likely any impact will occur (alone or in combination). If it is deemed necessary a full appropriate assessment will be undertaken to identify the significance of the impact. Appropriate assessment will be ongoing, at each specific stage of the LDP preparation. Action: additional text included.</li> <li>• Action: text amended.</li> <li>• Action: reference included</li> <li>• Action: a reference to update has been made</li> <li>• Action: Text has been altered, to take account of suggestions where appropriate. Matter relating to agricultural land use in the County Borough are not included as the LDP can have very little influence over agricultural practice and the choices made on the land management of these areas.</li> <li>• Action: Changes have been made to this section of the report setting out how appropriate assessment will be dealt with through the SA process, including how future stages in SA reporting will include more detail on these matters.</li> <li>• Action: an addition has been made to this implications section of the baseline information, to set out the requirement for</li> </ul>
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	<ul style="list-style-type: none"> <li>• 3.21 - 3.26 Include detail in coverage of climate change issues.</li> <li>• 3.27 - 3.36 There needs to be greater detail on what is creating these risks. It should also include a reference to sustainable drainage and the impacts of climate change.</li> <li>• 3.37 information such as leakage rates for the area should be considered.</li> <li>• 3.39-3.40 should make reference to sustainable drainage systems and permeable surfaces, and water supply matters</li> <li>• 3.41 Should refer to TAN15 flood maps instead of EA flood maps.</li> <li>• 3.45 Should refer to other air pollutants.</li> <li>• 3.47 Clarify M4 comments.</li> <li>• 3.51 Urbanisation of rural roads.</li> <li>• 3.52 Common land and foreshore reference.</li> <li>• 3.55 Cross-reference natural heritage and nature</li> </ul>	<p>appropriate assessment.</p> <ul style="list-style-type: none"> <li>• Action: TAN references added, and the addition of specifics as ways of adapting to climate change.</li> <li>• Action: the risks are indicated in figure 3.1, however this data was from the Environment Agency website and did not include any additional information on these risks. This is a gap in the available data, although interpretation of figures 3.1 and 3.2 is shown in paragraphs of this section.</li> <li>• Action: none leakage is controlled by the water utility companies, not the LDP.</li> <li>• Action: cross referenced to the climate change section that contains relevant details.</li> <li>• Action: refer to both.</li> <li>• Action: there is a lack of available data on other pollutants for Bridgend, now noted in the paragraph.</li> <li>• Action: Clarified.</li> <li>• Action: now covered within other objectives.</li> <li>• Action: Now covered in landscape section. Some basic statistics have been added.</li> <li>• Action: Amended.</li> </ul>
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	<p>conservation.</p> <ul style="list-style-type: none"> <li>• 3.57 Seek a relevant document from CCW on urban open space.</li> <li>• 3.58/9 Refer to other sections.</li> <li>• 3.60 Refer to dredging policy.</li>   <li>• 3.61 Refer to Conservation Regs. 2004.</li>   <li>• 3.77 This does not refer to the matters such as the availability of brownfield sites, or utilities and service provision is adequate to support continued growth. Travel to work data may be required to show the level of commuting in and out of the County Borough. Need to consider transport modes in the Borough.</li>   <li>• 4.6-4.10 Suggesting following additions; <ul style="list-style-type: none"> <li>• A number of international conventions</li>   <li>• A number of European directives</li> <li>• Local and regional policy.</li> </ul> </li>   <li>• 5.1 'Concerned' about reworked Sustainability Objectives within light SEA.</li> </ul>	<ul style="list-style-type: none"> <li>• Action: CCW Greenspace Guidelines reviewed and changes made where relevant</li>   <li>• Action: 3.58 amended</li>   <li>• This is a matter of environmental management rather than a matter for land use planning and the LDP.</li>   <li>• Would not seem an appropriate place for this reference.</li>   <li>• Action: none, such detailed assessment will be part of other pieces of the evidence base for the LDP, and will be an important part of plan making (if not undertaken this will be referred to in later stages of SA reporting. Action: TTW data has now been added to paragraph 3.70. Destinations and sources of commuting are shown already in the baseline information on employment.</li>   <li>• Some selective policies will be included. <ul style="list-style-type: none"> <li>• the majority of these are covered in proceeding policy (including TANS) or have limited relevance to a LDP and its SA. Many of them have been mentioned implicitly, but most of them are covered in UK and national documents. Listing them would add nothing to the SA process.</li> <li>• Covered in national and UK policy (including TANS)</li> <li>• These issues are for the LDP to take account of. In these cases it does not seem logical for the SA to replicate work and summarise large documents.</li> </ul> </li>   <li>• The primary concern of the framework is to comply with the SEA and other legal regulations. The framework has been</li> </ul>
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	<ul style="list-style-type: none"> <li>• 5.2 to 5.9 These objectives should be based on those in those in the ODPM / WAG Guidance on SA</li> </ul>	<p>considered very carefully and there is every confidence it considers the implication of the SEA Directive. Without specific suggestions from consultees changes are difficult to make. Similar sets of objectives, although tailored to the other local circumstances, have been successfully used in SA/SEA elsewhere in England and Wales. Appropriate assessment will not make use of these objectives, as this is separate process.</p> <ul style="list-style-type: none"> <li>• The approach taken in setting these objectives for the SA is not greatly different than those in the ODPM / WAG guidance, essentially covering the same topics. However, the set for Bridgend are more succinct, which is essential in creating a manageable SA process for a plan of this type. In addition the objectives chosen for this SA are those over which the LDP could be expected to have a clear relationship. This is essential in making the process understandable and fit for purpose, as by including objectives where the LDP has little impact and no cause and effect relationship can be established would not be appropriate for an SA of an LDP.</li> </ul>
Vale of Glamorgan Council	<ul style="list-style-type: none"> <li>• The approach is clearly set out.</li> <li>• The data could be easier to read, with more maps and charts.</li> <li>• May be useful to set out the implications of the plans and strategies identified in section 4</li> <li>• 3.48 &amp; 3.51 information within this paragraph is not entirely correct.</li> </ul>	<ul style="list-style-type: none"> <li>• No action required.</li> <li>• Action: Further charts and maps will be considered, where of most use.</li> <li>• Some detail is included for these plans, although to cover each in depth would be a very large task, and is unlikely to be of sufficient benefit to the SA process to be a worthwhile task.</li> <li>• Action: This information has been altered in light of these useful comments.</li> </ul>
Neath Port Talbot Council	<ul style="list-style-type: none"> <li>• Assessment of the effects of the BLDP on neighbouring areas.</li> <li>• Should include info on adjoining LAs.</li> </ul>	<ul style="list-style-type: none"> <li>• Action: A number of changes have been made, although it is difficult to adequately cover this issue, it will be important for the plan makers to ensure this issues is sufficiently addressed.</li> <li>• Action: included for some neighbouring authorities' plans.</li> </ul>
Environment	<ul style="list-style-type: none"> <li>• 3.18 threats to biodiversity from water extraction</li> </ul>	<ul style="list-style-type: none"> <li>• Action: text amended.</li> </ul>

Agency Wales	<ul style="list-style-type: none"> <li>• 3.41 Slightly misleading on flood risk</li> </ul>	<ul style="list-style-type: none"> <li>• Action: text amended to refer to TAN 15 Flood Risk maps.</li> </ul>
CADW	<ul style="list-style-type: none"> <li>• Unfortunate that the assessment process is now called SA rather than SEA, and gives the appearance of losing sight of the SEA component.</li> <li>• It may be worthwhile referencing Historic Landscapes in the landscape section of the Baseline</li> <li>• some figures on listed buildings do not match CADW's own records.</li> <li>• WAG's Environment Strategy relates to LDP.</li> <li>• Table 5.1 Use of term built environment.</li> <li>• Table 5.1 Explicit reference to structures of architectural importance.</li> </ul>	<ul style="list-style-type: none"> <li>• It is explained early in the process that this is an SEA widened to include the consideration of social and economic matters – in order to fulfil the SA requirements of the 2004 Planning Act. The SEA component has not been lost, but integrated into a larger process.</li> <li>• Action: reference made as suggested by CADW</li> <li>• Action: updated to reflect the latest data received by the LPA from CADW.</li> <li>• Action: WAG's Environment Strategy has been reviewed and alterations have been made to the document.</li> <li>• Action: text amended to reflect these comments.</li> <li>• Action: a reference to architectural quality has been added</li> </ul>
Bridgend Local Health Board	<ul style="list-style-type: none"> <li>• Comments specific to the LDP in general rather than the SA/SEA.</li> <li>• Key strategies overlooked, include the Bridgend Community Safety Strategy 2005-08.</li> </ul>	<ul style="list-style-type: none"> <li>• No action required.</li> <li>• Action: Several new pieces of baseline data have been added and a new section on health, where it was felt it was relevant to the planning system. The information was appreciated.</li> </ul>
Welsh Water/Dwr Cymru	<ul style="list-style-type: none"> <li>• No comments.</li> </ul>	<ul style="list-style-type: none"> <li>• No Action Required.</li> </ul>
Councillor M Quick	<ul style="list-style-type: none"> <li>• No comments.</li> </ul>	<ul style="list-style-type: none"> <li>• No Action Required.</li> </ul>

Councillor A E Davies	<ul style="list-style-type: none"> <li>• Look at neighbouring authorities</li> <li>• Tourism, local identity, needs adding throughout the report.</li> <li>• Need greater reference to the Objective 1 Programmes.</li> <li>• Reference to 'Sense of Place' should be made in sustainability objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Action: appropriate additional material has been added on the plans and strategies of neighbouring authorities</li> <li>• This issue is addressed in the Tourism, Heritage and economy sections, to a level relevant to a LDP SA.</li> <li>• Objective 1 is summarised in 3.80, it will be a matter that the LDP preparation team must assess.</li> <li>• Although this is an important matter to consider it is not included in the objectives, instead it is implicit in the built environment and community objectives.</li> </ul>
British Geological Survey	<ul style="list-style-type: none"> <li>• No comments.</li> </ul>	<ul style="list-style-type: none"> <li>• No action needed.</li> </ul>
Design Commission for Wales	<ul style="list-style-type: none"> <li>• 5.2 Resource use needs to be reduced to become more sustainable</li> <li>• Table 5.1 economic growth and employment should include developing local supply chains</li> </ul>	<ul style="list-style-type: none"> <li>• The sustainability appraisal contains the consideration of reducing resource use as one of its key themes, in terms of water, energy and materials</li> <li>• Consideration of local supply chains has been added into the wealth creation sub-objectives in figure 5.1.</li> </ul>
Bro Morgannwg NHS Trust	<ul style="list-style-type: none"> <li>• 2.10 Confusing wording</li> <li>• 3.5 No baseline data on human health.</li> <li>• 5.2 Access to resources matters should be better addressed to reflect equality</li> <li>• Figure 5.1 Reflect land use implications of improved health facilities and services.</li> </ul>	<ul style="list-style-type: none"> <li>• Action: The text has been amended. It is hoped it is now clearer.</li> <li>• Action: An additional section on health has been added to the baseline.</li> <li>• Action: Text altered to make this clearer, that this relates to natural resources, and the second bullet makes clear access now should be equitable.</li> <li>• Action: figure 5.1 is amended to ensure services are <i>good quality</i>, which implies improved where necessary.</li> </ul>

Mr VS Hughes	<ul style="list-style-type: none"> <li>No comments.</li> </ul>	<ul style="list-style-type: none"> <li>No actions needed.</li> </ul>
Mr PD Kinsella	<ul style="list-style-type: none"> <li>No comments.</li> </ul>	<ul style="list-style-type: none"> <li>No actions needed.</li> </ul>
Mr Gareth AMES	<ul style="list-style-type: none"> <li>No comments.</li> </ul>	<ul style="list-style-type: none"> <li>No actions needed.</li> </ul>
Porthcawl Civic Trust Society	<ul style="list-style-type: none"> <li>No comments.</li> </ul>	<ul style="list-style-type: none"> <li>No actions needed.</li> </ul>
Mr & Mrs RJ Hayes	<ul style="list-style-type: none"> <li>No comments.</li> </ul>	<ul style="list-style-type: none"> <li>No actions needed.</li> </ul>
British Horse Society	<ul style="list-style-type: none"> <li>No reference to public rights of way or public access land in recreation section. No reference to "Rights of Way Improvement Plan"</li> </ul>	<ul style="list-style-type: none"> <li>Action: This omission has been accepted and baseline data and reference to urban green space and the ROWIP are now included.</li> </ul>
Porthcawl 4M group	<ul style="list-style-type: none"> <li>No comments.</li> </ul>	<ul style="list-style-type: none"> <li>No actions needed.</li> </ul>
South Wales Sea Fisheries	<ul style="list-style-type: none"> <li>No real consideration of the sea beyond defence and bathing, such as commercial fishing and aquaculture, watersports, recreation, tourism, biodiversity, landing marine aggregates – through consideration of Coastal Zone Management</li> </ul>	<ul style="list-style-type: none"> <li>Given the current jurisdiction of LAs is to mean low water mark, the LDP does not cover uses below this point. Matters related to the economic uses of the coast and shore are considered in the economics section, and the impact of new built development on the coast will be assessed for biodiversity impact (on and off shore)</li> </ul>
Bridgend Housing Partnership	<ul style="list-style-type: none"> <li>Affordable housing for those in the County Borough is a concern. There is anecdotal evidence that in-migration for cheaper housing is occurring, and much new housing supply is used for this.</li> </ul>	<ul style="list-style-type: none"> <li>Consideration of housing levels in the correct locations is an important consideration of the SA, and there is a sustainability objective related to this point. The SA will seek to ensure the LDP takes these matters fully into account. It will also be an objective of sustainable development to see more self-containment of jobs and homes in the County Borough to reduce the need to travel – and where this is made secure sustainable modes.</li> </ul>

Bridgend Town Centre Forum	<ul style="list-style-type: none"> <li>Section 3: it may be suitable to add baseline categories of health, housing needs, crime, health impact assessment</li> <li>Suggestions for inclusion of additional plans and programmes relevant to the area</li> </ul>	<ul style="list-style-type: none"> <li>Action: additional material has been added on health and disparities, including some reference to crime, reference to housing needs is already included in the section of the baseline report.</li> <li>While the suggested additional strategies etc are important considerations for LDP preparation, their inclusion is not of sufficient relevance to this SA of an LDP, and therefore are not included.</li> </ul>
Communities First Bridgend	<ul style="list-style-type: none"> <li>Employment figures are too vague and should be looked at ward level.</li> </ul>	<ul style="list-style-type: none"> <li>The SA deals with Strategic level issues, and the wider possible effects of the overall plan. It is unnecessary to include very detailed baseline data in the SA, as the LDP will consider this as part of a robust evidence base.</li> </ul>
Mr Alec McKenzie	<ul style="list-style-type: none"> <li>No comments.</li> </ul>	<ul style="list-style-type: none"> <li>No actions required.</li> </ul>
H Price	<ul style="list-style-type: none"> <li>No comments.</li> </ul>	<ul style="list-style-type: none"> <li>No actions required.</li> </ul>
Island Farm Action Group	<ul style="list-style-type: none"> <li>The SA does not cover species and habitats not specifically protected in law or higher level protection, for example dormice.</li> <li>Will appropriate assessment under the Habitats Directive be part of the SA?</li> <li>Endorse comments on landscape.</li> <li>Sequential test should be used for mineral workings.</li> <li>Green Wedges, re-instatement of a specific green Wedge at Island Farm.</li> </ul>	<ul style="list-style-type: none"> <li>The SA makes reference to the LBAP and non statutory areas of importance in 3.16, and the general protection of species.</li> <li>Appropriate assessment will be part of the SA process, and screening for need and assessment will take place as necessary.</li> <li>No actions required.</li> <li>It is not the role of the SA to suggest specific policy, although the protection and efficient use of land is a sustainable objective, therefore all policies proposing a use of land will be subject to appraisal against this objective.</li> <li>Green Wedges are planning rather than environmental designations (although retaining the individual character of settlements may be of relevance). It will be up to the more</li> </ul>

		<p>detailed parts of the LDP to consider this, it is not the role of the SA, if not included in the LDP the SA may highlight this matter for inclusion.</p>
Greenfields Land Reclamation Wales	<ul style="list-style-type: none"> <li>No comments</li> </ul>	<ul style="list-style-type: none"> <li>No action required</li> </ul>
Laleston Community Council	<ul style="list-style-type: none"> <li>Timescale for comments for was not sufficient</li> <li>No mention of reaching saturation point on greenfield land</li> <li>3.20 suggested word change to first bullet to replace 'exceptional circumstances' with 'national emergencies'</li> </ul>	<ul style="list-style-type: none"> <li>The statutory time period for comments was given. The LPA address timescales for the stages of LDP preparation in its Delivery Agreement.</li> <li>This matter will be part of the SA process itself, as making efficient use of land is a sustainability objective for the process</li> <li>The wording comes from a legislative requirement and therefore cannot be changed to "national emergencies", although additional wording has been added for clarification.</li> </ul>
Glamorgan and Gwent Archaeological Trust	<ul style="list-style-type: none"> <li>If they can be of assistance please contact them</li> </ul>	<ul style="list-style-type: none"> <li>Noted</li> </ul>

Notes following Stakeholder Meeting 15<sup>th</sup> August 2006 (The Questions posed to the Forum are in Bold type)  
 Combined notes from table discussions of Scoping Report at Stakeholder event

<b>Comments</b> (paragraph numbers refer to consultation version of the Scoping Report)	<b>Response</b>
<p><b><u>Q1. Do you agree with the proposed approach to the SA?</u></b></p> <ul style="list-style-type: none"> <li>• Reasonably happy with approach, but difficult to comment due to generality of the terms and references</li> <li>• Need to take view of adjoining LAs into account</li> <li>• Follows guidance and good practice, sets it out quite clearly</li> <li>• 'No development' option should be considered</li> <li>• Lack of quantification is concerning</li> <li>• Is it just an administrative process, is it cost effective?</li> <li>• Appraisal of alternatives</li> <li>• Suggest that before completing the matrix, assessment is done thoroughly – could send matrices to the community to get their views?</li> </ul> <p>Stakeholders should use their expertise to take part in the process</p> <ul style="list-style-type: none"> <li>• Ridiculously complicated</li> </ul>	<ul style="list-style-type: none"> <li>• Due to the large area covered by the County Borough it is not possible to express matters on too detailed a level, as this would not be a reasonable amount of information to collect for this task.</li> <li>• Some additional material has been added on the plans and strategies of neighbouring LAs</li> <li>• Noted.</li> <li>• Not appropriate under expectation of national policy.</li> <li>• Additional quantification may begin to be added to the sustainability objectives as the Council develops a monitoring scheme for the LDP.</li> <li>• SEA and SA are both required by regulation, but beyond this the appraisal stages of the SA will actively help create a more sustainable and better LDP through a process of critical assessment.</li> <li>• This will be part of the SA.</li> <li>• Completing all matrices with the help of communities may be worthwhile – but would be extremely time consuming. There will be various stages of SA reporting where the public can comment on the SA, including matrices, and these comments can be taken on board in successive stages of the appraisal.</li> <li>• To some extent the process that must be followed is set out in the SEA Regulation, the approach taken to this SA aims to keep</li> </ul>



<ul style="list-style-type: none"> <li>• Agrees SA should be done by external consultants as gives a degree of independence</li> <li>• Document is clear to understand, user friendly</li> <li>• CCW have concern over approach to Appropriate Assessment</li> </ul>	<p>the process simple and although meeting these requirements do this in a way that will help produce a better outcome.</p> <ul style="list-style-type: none"> <li>• Noted.</li> <li>• Noted.</li> <li>• See response to CCW comments as set out in first schedule above.</li> </ul>
<p><b><u>Q2. Do you agree with the sustainability characterisation of Bridgend County Borough?</u></b></p> <ul style="list-style-type: none"> <li>• There should be a reference to ‘sense of place’</li> <li>• In response to comment – is there enough information? Need to be more concerned with impacts otherwise could keep just gathering more and more information.</li> <li>• Helpful to have more diagrams and maps</li> <li>• Useful for more comparison with the UK and Wales when data is presented</li> <li>• Error in reference to SEWTA’s work and reference to ‘South East Wales Regional Transport Plan’</li> <li>• Schedule of categories covered quite comprehensive</li> </ul>	<ul style="list-style-type: none"> <li>• Although this is an important matter to consider it is not included in the objectives, instead it is implicit in the built environment and community objectives.</li> <li>• The SA is in agreement with this statement, it is hoped the level of information in the baseline characterisation is sufficient to identify the main issue in the area, as the only purpose is in helping the accuracy of impact assessment.</li> <li>• Some additional maps have been added, one of the difficulties with getting these in a report of this type is the lack of on-line GIS information for Wales.</li> <li>• Where available comparison data is included, often where reporting findings of other plans and strategies comparator data is not included and the source is not given.</li> <li>• Amended</li> <li>• Noted</li> </ul>

<ul style="list-style-type: none"> <li>• Could include other statistics, health, housing, crime etc.</li> <li>• The document is lengthy – not following the ethos of the LDP, simpler if not repetitive of National Policy, too complicated</li> <li>• Lack of community sustainability – people won't be able to relate to it if they can't identify the issues where they live, information needs to be collected on a local level.</li> <li>• Should aim for a realistic compromise between commercial and sustainable objectives</li> <li>• Most people do not have the knowledge to question the information</li> <li>• Good start, but information needs to be kept under review</li> </ul>	<ul style="list-style-type: none"> <li>• Additional information has been added on health and disparities, which refers to crime, some information on housing is already contained in the report.</li> <li>• The regulatory process of SEA requires specific requirements to be met in reporting, which leads to longer reporting – it is not covered by the same Regulations as LDP plan making.</li> <li>• The information is collected to help guide a plan covering the whole of the County Borough, collecting detailed information on every community would not be possible or appropriate at this stage. Additional material should be collected where appropriate as part of evidence gathering for the LDP.</li> <li>• The objectives cover all areas, compromise is not the intent of the sustainability appraisal, and wherever possible an approach that is beneficial (or at least not harmful) to any objective should be found.</li> <li>• This is a technical document in order to satisfy statutory requirements for SA / SEA.</li> <li>• Noted</li> </ul>
<p><b>Q3. Do you agree that the other plans and strategies in Section 4 should be used to inform the SA?</b></p> <ul style="list-style-type: none"> <li>• Reference to Objective 1</li> <li>• Information on neighbouring LAs strategies and plans is required– in particularly UDPs etc and strategic development sites</li> <li>• Not clear how these plans and strategies relate to</li> </ul>	<ul style="list-style-type: none"> <li>• There is a reference to the Objective 1 area in the text.</li> <li>• Some additional information has now been included.</li> <li>• These are helpful in identifying the sustainability objectives for</li> </ul>

<p>the SA/SEA</p> <ul style="list-style-type: none"> <li>• Include: heath strategies, the WAG National Economic Development Strategy, Community Safety and Young People Strategies, Bridgend's Contaminated Land Strategy, Municipal Waste Strategy, Environment Agency strategies</li> <li>• Repeating what is already out there – a bit complicated</li> <li>• Competing priorities between Councils</li> <li>• Need to kept under review</li> </ul> <p><b>Q4. Do you agree with the sustainability objectives for use in the SA?</b></p> <ul style="list-style-type: none"> <li>• 'Accessibility' sustainability objectives should encourage sub-regional transport planning</li> <li>• Some sustainability objectives may counter others, how will this be managed?</li> <li>• What about the smell of water treatment</li> <li>• Accessibility, should check against SEWTA objectives</li> <li>• Promote new development along sustainable</li> </ul>	<p>the SA.</p> <ul style="list-style-type: none"> <li>• Some additional strategies have been added, however the scope and quantity of plans and strategies that are relevant to the SA has to be limited, in order to make the task realistic for its purpose.</li> <li>• The SA does agree to some extent on this, but the SEA process requires certain regulatory reporting requirements, including the identification of relevant plans and strategies.</li> <li>• This is an important point and should be picked up by the LDP team as part of their evidence gathering for LDP preparation</li> <li>• Noted</li> <li>• The SA will consider whether the LDP makes appropriate provision for reducing car use and ensuring all trips – within and to and from the authority can be made by alternative means. This falls under sustainability objectives relating to energy use and air quality.</li> <li>• The purpose of the SA will not be to weigh up the sustainability objectives against one another, instead it will be to make explicit all the likely sustainability impacts of the emerging LDP. This will help those preparing the LDP to find ways to avoid and mitigate against these.</li> <li>• Not possible to cover all detailed matters</li> <li>• Noted</li> <li>• One of the roles of the SA is to ensure a sustainable spatial</li> </ul>
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<p>transport routes</p> <ul style="list-style-type: none"> <li>• May be necessary to reference equality issues as in community strategy</li> <li>• Needs to be an objective on waste currently too directed at minerals</li> <li>• No targets, is this a bit basic?</li> <li>• Perhaps too much environmental bias – only total of 6 social and economic objectives</li> <li>• Need to kept under review</li> <li>• Needs a reference to education</li> </ul> <p><b><u>Q5. Do you have any other comments to make about the SA?</u></b></p> <ul style="list-style-type: none"> <li>• Is it realistic or are there too many variables?</li> <li>• Concern over cost effectiveness</li> <li>• The sustainability appraisal is not sustainable</li> <li>• Hard decisions have to be taken</li> </ul>	<p>strategy for new development is developed for the LDP, one such consideration will be accessibility of new development by public transport.</p> <ul style="list-style-type: none"> <li>• Additional points have been added to the objectives to reflect the important of equity of access in the County Borough</li> <li>• The objective has been renamed to reflect that it covers waste issues as well as minerals.</li> <li>• Targets may be added relevant to the LDP monitoring process</li> <li>• The number of objectives is irrelevant as no scoring of impacts will take place, with all impacts having their own weight.</li> <li>• Noted</li> <li>• Education is part of the skills section</li> </ul> <ul style="list-style-type: none"> <li>• Sustainability is a complex issue composed of many matters, moving forward with the SA may help better identify the key matters of sustainability in relation to the LDP</li> <li>• SA must be completed, for an independent and critical assessment of the emerging LDP it may be most suitable to use those from outside the authority for the assessment</li> <li>• Noted – not clear the intention of this comment</li> <li>• Agreed: SA is a complicated process, but it can be a tool in helping make some decisions.</li> </ul>
<ul style="list-style-type: none"> <li>• Approach does not go far enough in improving Authority's sustainability performance</li> <li>• Need to use fewer resources now</li> <li>• Need to involve local communities</li> </ul>	<ul style="list-style-type: none"> <li>• This is the first stage of the SA – the appraisal has not yet taken place as there is nothing yet to appraise. In addition the SA is only of the LDP rather than the wider performance of the Authority.</li> <li>• This objective has been changed</li> <li>• Local communities have the chance to comment on the SA</li> </ul>

<ul style="list-style-type: none"> <li>• Evidence base is weak and too general</li>   <li>• The South East Wales Biodiversity Records Centre has agreed to provide information for the LDP</li>   <li>• 3.1- 3.5 refer to the SEA regulations</li> <li>• Transport section factually inaccurate</li> <li>• Paragraph 4.36 led to a discussion of car parking and is incorrect</li>   <li>• 5.2 regarding sustained objectives is incorrect</li> <li>• Targets may be suitable in the sustainability objectives</li> </ul>	<p>reports that are made public during LDP preparation</p> <ul style="list-style-type: none"> <li>• The amount of information collected has to be in accordance with its use in the SA, collecting a large amount of detailed data would add little to the appraisal process and be extremely time consuming, there is a balance to be struck between detail and time constraints.</li> <li>• The scoping report evidence gathering is primarily for the SA, evidence gathering for the LDP needs to be an independent exercise, and include the detailed and community based issues in order to ensure a good quality plan – biodiversity information will be part of this</li> <li>• Changes have been made to this section</li> <li>• Changes have been made to this section.</li> <li>• There is no paragraph 4.36 and it is not clear what is referred to. Car parking issues may be one of the matters addressed in the LDP to reduce car use, and promote alternatives sources – although the SA cannot comment at this time.</li> <li>• This has been amended</li> <li>• The objectives indicate the direction of change that is desired in meeting the objective, although there are no clear targets</li> </ul>
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