



BRIDGEND COUNTY  
BOROUGH COUNCIL

**Responses to representations  
received on the Sustainability  
Appraisal of the Bridgend  
Local Development Plan Pre  
Deposit Proposals & Habitat  
Regulations Assessment  
Screening**

July 2009

## **Comments from the Countryside Council for Wales**



# Cyngor Cefn Gwlad Cymru Countryside Council for Wales

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Ein cyf:/Our ref: C.09.97.07/AB/JH

30 March 2009

Dear Sir

## **BRIDGEND COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN (LDP) – PRE-DEPOSIT PROPOSALS, HRA SCREENING REPORT**

Thank you for giving the Countryside Council for Wales (CCW) the opportunity to comment on the HRA screening report for the Bridgend LDP. Our comments are made in the context of our responsibilities under the Conservation (Natural Habitats & c) Regulations 2004 (as amended) and as adviser to the Welsh Assembly Government on the natural heritage of Wales and its coastal waters.

CCW supports and welcomes Bridgend's efforts in undertaking this assessment process. Our specific comments are contained within Annex 1 to this letter. Our general comments follow.

CCW accepts the use of spatial search areas is a useful tool for HRA screening. However, the implementation of a plan may have significant effects on European sites at a considerable spatial distance. This HRA screening should consider potential effects alone and 'in combination' of the Plan for European sites outwith a 15km zone.

Further explanation is required for the elimination of Dunraven Bay SAC, Blaen Cynan SAC, Crymlyn Bog SAC/Ramsar, Coed Nedd a Mellte SAC, Cardiff Beech Woods SAC and Cwm Cadlan SAC from this HRA process.

Should you have any queries regarding our comments, please contact CCW's Regional Team or Kerry Rogers at our Cardiff office.

Yours sincerely

**Dr M I Hill**  
**Regional Manager**  
**South and East**

cc: Gill Barter, Alison Brown



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## ANNEX 1

### HRA SCREENING, BRIDGEND LDP

- 1.4 It should be noted that while the amended Conservation Regulations refer to assessment of “land use plans”, the Habitats Directive (Art 6(3)) refers to “any plan”. CCW would suggest that further adjustments may yet be required to the Conservation Regulations.
- 3.0 Identification of European Sites. CCW accepts the use of a 15 km search area is useful for the purpose of initial screening. However, the implementation of a plan or project may have significant effects (above or in combination) on European sites at considerable spatial distance from the plan or project area. The potential for spatially distant effects needs to be considered in terms of ‘in combination’ effects and in the context of natural goods, services and resources exploited by the Plan, eg water discharge, water resources, etc.
- 3.3 Further explanation/justification is required on the elimination of Dunraven Bay Sac, Blaen Cynan Sac, Crymlyn Bog SAC/Ramsar, Coed Nedd a Mellte SAC, Cardiff Beech Woods SAC and Cwm Cadlan SAC from the HRA process. The aim of the HRA screening process is to clearly demonstrate the likelihood of significant effects (otherwise) of a plan/project on a European site.  
As discussed in Section 3, the potential effects of a plan/project are not determined by spatial distance. In addition, the potential effects of a plan are not necessarily confined to allocated development.  
CCW would suggest that further justification is required for the exclusion of European sites from the requirement for “appropriate assessment” and that this report acknowledges and makes a commitment to “re-screen” as plan policies and allocations develop.
- 3.4 With regard to “buffer zones” see comments on 3.0 and 3.3 above.
- 4.2 You should note that, in relation to Kenfig SAC, all the features listed are primary features for selection but the fixed dunes are a priority feature. In addition, while erosion of the dune faces is an issue for certain areas of the site, dune stabilisation is also a significant management issue, ie the situation is more complex than just insufficient sediment supply.
- 5.2 Additional impacts may result from transport and infrastructure policies. Consideration needs to be given to potential effects of servicing new development, eg water supply and discharge.
- 6.1 CCW welcomes the commitment to reconsider the assessment. Clarification is required as to whether the HRA screening will be reconsidered as policies develop.

#### 6.2/Appendix 4

CCW notes the statement that “impacts on Dunraven Bay SAC are unlikely”. This discussion appears to contradict the discussion on Dunraven Bay within Appendix 4 which identifies the potential for a number of adverse effects. Clarification is required as to whether screening has considered potential ‘in combination’ effects with other plans/projects.

- 6.5 CCW agrees that Blackmill Woodlands SAC should be subject to further assessment.
- 6.6 CCW agrees that Kenfig SAC should be subject to further assessment. 'In combination' effects with other plans and programmes must also be considered.
- 6.7 FCW agrees that the Cefn Cribwr Grasslands SAC should be subject to further assessment.
- 6.8 See comments on 6.2.
- 6.9 A number of plans/projects have the potential to engender 'in combination' effects including the Wales Spatial Plan, Regional Transport and Waste Plans, Water Resource Management Plans, etc. CCW would suggest consideration of 'in combination' effects should not be restricted to LDPs. 'In combination' effects of projects have not been considered in this report.

#### **Appendix 2**

See comments on Section 3 with respect to "buffer zones".

#### **Appendix 3**

CCW is disappointed that only a limited number of sites are included within this Appendix. Further to our comments in 3.3 of this report, justification is required as to why other sites within and/or potentially affected by the Bridgend LDP have been screened out of this assessment.

#### **Appendix 4**

See comments on 3.3 and 6.2.



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Ein cyf:/Our ref: C.09.97.07/KR/JH

30 March 2009

Dear Sir

## **BRIDGEND COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN (LDP) PRE-DEPOSIT PROPOSALS CONSULTATION ON SUSTAINABILITY APPRAISAL MARCH 2009**

Thank you for giving the Countryside Council for Wales (CCW) the opportunity to comment on the Sustainability Appraisal/Strategic Environmental Assessment for the draft Pre-Deposit LDP. Our comments are made in the context of our role as a consultant body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and as advisers to the Welsh Assembly Government on the natural heritage of Wales and its coastal waters.

In general, CCW acknowledges the continuing engagement of Bridgend CBC with the SA/SEA process and welcomes many of the recommendations of the SA report, particularly in relation to the assessment of strategic polices. However, we have some significant concerns with the process as it has been carried out, which are summarised below. Our detailed comments are attached in Annex 1 to this letter and our comments on the Habitats Regulations Assessment (HRA), submitted as part of the consultation on the LDP process, will be made separately.

CCW welcomes the acknowledgement that the Strategic Environmental Assessment (SEA) process is separate to, but contained within, the Sustainability Appraisal (SA) carried out on the Bridgend LDP. However, it is important to identify where the assessment process meets the requirements of the SEA regulations within the SA report, and that where evaluations or justifications are being made on the basis of SA criteria. The current SA appraisal does not always do this, which leads to a lack of clarity regarding assessment of the significant environmental aspects of the LDP and, at times, may appear to undermine or devalue the SEA process itself.

The SA/SEA process must also show how it has taken on board the comments of the statutory consultees. It is not clear that this has been the case in the current document and we look forward to seeing how the future iterations of the SA/SEA incorporates both the following comments and those made to previous consultations.



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The SEA (and HRA) process is intended to 'provide for a high level of environmental protection' (Article 1 of the SEA Directive) and therefore ensure that the potential significant environmental effects of the plan being assessed are identified and, where positive, enhanced and when negative, minimised and mitigated. It is also intended to identify a clear baseline from which to measure changes, explore alternatives and identify gaps in knowledge or understanding which will require monitoring as the plan is implemented. To achieve this, the plan must incorporate the findings of the assessment process, where possible, or clearly justify why this is not the case and what alternative steps are being made to address the issues raised. This is a requirement as set out in the Regulations and Government guidance (A Practical Guide to the Strategic Environmental Assessment (SEA) Directive, ODPM, 2005). The SA/SEA process is an iterative one and there should be ample opportunity for SA/SEA and the Plan to change to take account of the developing SEA process. We acknowledge and welcome that some changes have already been made to the LDP as a result of the assessment process, but CCW will be looking forward to seeing how the issues identified, and recommendations made, in the SA/SEA, are fully incorporated into the final Plan.

The SA/SEA process should be an integrated approach (Local Development Plans Wales, Welsh Assembly Government, 2005) but it is of some concern that certain elements of the assessment process seem to have been carried out separately to the SA/SEA and therefore do not form part of this report. We would strongly recommend that SA report contains all relevant elements of the appraisal process.

The SA/SEA process is intended to be initiated at the earliest stages of Plan development, thereby allowing all the alternatives and options to be fully appraised. We note, however, that a number of "existing commitments" have resulted in some options being deemed as unachievable and therefore outside the scope of the SA/SEA. It is important to identify what exactly the nature of such existing commitments are, as CCW considers that existing allocations within current local plans that do not have planning permission should not simply be rolled forward, but should be reviewed through the SEA process to ensure that they are sustainable. Even when development is already committed it should still be considered in the context of the Regulations' requirement to consider, cumulative, in-combination and synergistic effects. We, therefore seek clarification on the nature of these "existing commitments" as matter of some urgency.

I hope you find these comments helpful. Please do not hesitate to contact Gill Barter or Kerry Rogers in the first instance if you wish to discuss this response further.

Yours sincerely



**Dr M I Hill**  
**Regional Manager South and East**

cc Bakers Associates

## **Annex 1 Detailed: Comments on the Bridgend CBC Pre Deposit Local Development Plan Sustainability Appraisal Report**

### **2 Approach to the Sustainability Appraisal**

2.1 – 2.4 CCW fully appreciates that the Sustainability Appraisal (SA) incorporates the Strategic Environmental Assessment (SEA) process. We also appreciate that there is a certain degree of flexibility within the SA/SEA process, partly to enable the uncertainties and complexities identified in this appraisal report to be dealt with. However, it is important that the requirements of the SEA regulations are clearly identified within the SA report, particularly where an evaluation of a policy, option or allocation is being made against SA criteria which may not fully reflect the full scope, aims and objectives of the SEA Regulations (2.2). The SA process is fully compatible with the SEA Regulations so this should not be an onerous task, however, it is important that the economic and social values at the core of the SA process do not unintentionally imbalance or mask the environmental criteria as set out in the SEA Regulations. The process must ensure that the evaluation is capable of identifying the significant environmental effects of the plan, and where these effects are potentially negative, appropriate measures recommended to address the potential adverse effects of the subject (policy, allocation, strategy etc.) being assessed.

2.6 Scoping – While it is not a requirement for the SA report to set out how comments and recommendations made at the formal SEA scoping stage have been incorporated into the Plan development process, including such a “change log” does provide a straightforward and transparent method for demonstrating that this has been done. We note that this was included (appendix 3) in an updated scoping report produced in December 2006, on which we were not consulted, though we also note that this does not demonstrate how recommendations have been incorporated into the LDP itself. CCW would welcome this being done as part of the process outlined in 2.10 in future iterations of this report.

2.8 Initial SA of the Growth Options Report - We are somewhat concerned that the assessment of growth options seems to have been restricted by the roll forward of “existing commitments” thereby rendering the lowest growth option unachievable. The SA and SEA process is intended to be initiated at the earliest stages of the Plan development process, allowing all the alternatives and options to be fully assessed. It is important to identify exactly what “roll[ed] forward” means in this context, as CCW considers that existing allocations within the Unitary Development Plan that do not have planning permission should not be simply rolled forward, but should be reviewed through the SEA process to ensure that they are sustainable. We consider this to be the case even if the UDP in question underwent a “retrospective” SEA of its own. Even when development is already committed, it should still be considered in the context of the Regulations’ requirement to consider, cumulative, in-combination and synergistic effects. We, therefore seek clarification on the nature of these “existing commitments” as a matter of some urgency as they may necessitate a significant re-evaluation of the strategic growth options.

### **3 Sustainability Objectives**

3.1 – As we clearly stated in our previous response to the SA/SEA Scoping consultation (September 2006) CCW has strong reservations over the application of the objectives developed for the Unitary Development Plan SA to the LDP.

In addition, we are unconvinced that the process behind the development of these SA objectives takes fully into account the legal requirements of the SEA Regulations. While we note that many of the aspect areas identified in Annex 1 of the SEA Directive are now adequately covered in the suite of SA objectives, our previous comments and concerns must remain.

3.2 - 3.3 In our response to the Bridgend SA/SEA scoping report (September 2006) we recommended a further 43 plans, policies or programmes which we felt the SA/SEA should take into consideration. There is no reference to whether these plans were considered or any further indication as to how the SA/SEA has taken into account the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects of these other plans, policies and programmes. We note that an explanation of the process, as well as a full list of the baseline characteristics, is available (BLP4). However, as we have no record of having been formally consulted on this, the inclusion of an annex to this document listing the key elements of this scoping report, and how it has influenced the selection and drafting of the objectives, would have been both useful and expected.

3.4 – 3.10 CCW acknowledge the importance of sustainable development and its application, through the Sustainability Assessment process, to the LDP. However, while the SA process is fully compatible with the SEA process, it is not identical and this section of the report should clearly set out how the requirements of the SEA Regulations have been complied with. As it currently stands this is not the case.

3.11 While it is appreciated that developing objectives, identifying indicators and quantifying targets is not easy or straightforward, it is an important part of the SEA evaluation process. Indicators will change as the plan develops and the assessment is refined; final targets will be amended, added or removed depending on how the plan reacts to the SEA and the significant effects are narrowed down. Ultimately, only a small number of indicators and targets may be taken forward from the SEA process to the final iteration of the plan to measure its predicted environmental effects. The current form of the objectives, while helpfully clarified by the sub-objectives, make it difficult to see how any of the environmental impacts have been evaluated. This is clearly illustrated when these are applied to the LDP objectives, which have no negative sustainability elements identified for them. While it is highly commendable that the LDP objectives fully embrace all aspects of sustainable development we find it unlikely that no potential negative environmental aspects are contained within them.

The descriptive methodology used, without clear reference to the objectives, is also of some concern. Without applying some form of evaluation, related to the SA objectives, it is very difficult to see how any significant environmental effects resulting from the various elements of the LDP have been identified. While we appreciate that indicators will be identified as part of the development of the monitoring framework, this will not assist in identifying, quantifying or enhancing/avoiding/mitigating the significant environmental effects of these elements of the plan at the evaluation stage. Given this, we seek reassurance that the current methodology, as it stands, effectively meets the requirements of the SEA Regulations.

3.12 CCW welcomes the intention to develop indicators for monitoring, but emphasise again that these should also form part of the overall evaluation process.

3.13 Despite the concerns noted above, CCW welcomes the identification of the majority of the sustainability objectives and their sub-objectives as listed in table 3.1. Many of the sub-objectives could be developed into useful and meaningful indicators and targets and should be considered alongside the possible indicators and targets identified in table 10.1. One concern is the lack of a compatibility assessment within this section to ensure that the objectives do not have their own environmental impacts. We would recommend that this be carried out and included in future iterations of this report to illustrate the environmental sustainability of all the objectives.

Table 3.1

- Health Safety and Security – Rather than “open space” recommend reference to Accessible Natural Green Space as defined by the CCW toolkit. In addition to reducing car use by encouraging walking and cycling the sub-objective should indicate how this will be achieved eg by supporting local initiatives such as “safe Routes to School” and infrastructure improvements such as “Home-zones”
- Biodiversity – recommend including “and seeks to enhance connectivity” to the sub-objective on avoiding habitat fragmentation
- The sub-objective relating to historic landscapes should seek to ensure that any significant development is fully assessed using recommended methodology (ie ASIDoHL 2)
- Air – There should also be a more general sub-objective that sets out the aim of maintaining air quality in the wider context including impacts on habitats and species.
- Land/Soils – a sub-objective specifically relating to preservation of “carbon rich” soil (for example deep peat deposits) should be considered
- Minerals and waste – the first sub-objective should contain a caveat that the winning of all mineral resources will be subject to an appropriate level of assessment where environmental impacts are likely.
- Renewable energy – The first sub-objective should also contain a caveat that all major renewable energy developments will be subject to an appropriate level of assessment where environmental impacts (including those on landscape) are likely.
- Employment and Wealth Creation – it should be noted that several of these sub-objectives have the potential to have significant negative environmental effects.

#### **4 The Purpose of sustainability appraisal**

Article 1 of the SEA Directive (2001/42/EC) states that [the SEA process] is to provide for a high level of environmental protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development’. For the purpose of this SEA/SA, therefore, it must be borne in mind that the principal goal is to ‘provide for a high level of environmental protection’ and not to just ameliorate damaging environmental policies or “deliver more sustainable development”.

CCW understands the SA/SEA process is focussed on the Significant Environmental Impacts of the plan in its widest context and that the Habitats Regulation Assessment is being carried out separately.

However the combined SEA/SA must also conform to the Conservation (Natural Habitats & c) (England and Wales) Regulations 2007 (The Habitats Regulations) and both the findings of this assessment and the general duties of the Authority in relation to the Habitats Regulations must be clearly identified in this report.

## **5 Sustainability Appraisal of the Vision and Objectives**

5.2 CCW welcomes the application of the Sustainability Objectives (subject to the concerns identified above) to the LDP objectives. We agree that the amended LDP objectives do cover many of the issues identified in the SEA guidance. However, in the appraisal table (appendix 1) the potential significant environmental effects have not been clearly identified, particularly where “unknown” or “neutral” effects have been recorded. For example, for OBJ1a and b no potential sustainability issues have been identified for landscape or biodiversity, despite both development objectives having the potential to have impacts (both positive and negative) on these factors. Similarly for OBJ1c identifies an “?” against these two factors but the comments section does not clarify what the possible positive and/or negative effects might be. It may be more appropriate to use a “+/-“ indicator for this type of assessment rather than a “?”.

Another example would be the SA objective for “Energy” which appears to have no relationship with any of the LDP Objectives other than transport and renewable energy generation – it is particularly unclear how reducing traffic congestion and encouraging modal change is likely to contribute to greater sustainability in renewable energy generation while Regeneration Objectives OBJ3a, and particularly OBJ3c, have no relationship with it and OBJ2a (promoting, conserving and enhancing the natural environment) has no potential negative contributions. There are several more similar examples. CCW does welcome the identification of possible adverse impacts in the comments section for some LDP Objectives (such as OBJ2e - renewable energy generation, OBJ3b allocation of land for development) but would question why Objectives with a similar potential for having adverse impacts, such as housing objective OBJ4c, do not. The potential positive contribution that could be made by Objective OBJ2c (mitigating/avoiding flood risk) to biodiversity, in the form new pond and wetland creation etc., has also been missed.

It is possible that considerable additional evaluation work was carried out as part of the production of this table which is a simplification of this complex process. However, as it currently stands, CCW would question its usefulness in the appraisal process and would strongly recommend any additional work is included, or further clarification of the assessments carried out presented.

5.2 Given the comments above, the list of issues raised in this section appears somewhat restricted.

## **6 SA of the Growth Options**

We note that the appraisal of the various growth options contained within this report is a summary of other sustainability appraisals carried out in the summer of 2007. While it is not necessary for us to be consulted on every aspect of the SEA process it is difficult to fully appreciate the context of these summaries without seeing how the SA objectives have been applied.

We note that there appear to be additional SA appraisals contained within the main Pre-deposit LDP document and we would welcome clarification as to whether these are to be considered part of this Sustainability Appraisal.

Similarly, it is not necessarily incorrect to simplify the assessment process to evaluate growth “themes” rather than assess every element of the LDP option individually or selectively apply the most relevant SA Objective to the option in question. However, it is necessary for the SA/SEA process to show how the “significant environmental effects” of the options have been evaluated and it is not clear in the current report how this has been done. We would emphasise that this does not mean that CCW disagree with the findings of the SEA report, more that it is difficult to assess the basis for which these recommendations are being made or that they have fully considered all the relevant environmental issues.

6.4 - 6.8 We appreciate that it is not straightforward to evaluate the potential impacts of a general growth option but it is important to consider all the potential significant environmental impacts before making recommendations. For example, the potential negative impacts on biodiversity, landscape, soil and mineral provision are listed in relation to development on green field land but there are also impacts to water quality, flood risk (even if not on the flood plain it may lead to reduction in infiltration rates and synergistic effects further down the catchment), access to green space etc. Many of these could be mitigated for by inclusion of suitable policies or approaches and some may also have significant positive environmental potential. However, without a clear methodology for how this has been assessed it is difficult to ascertain if this is the case.

6.11 – 6.13 We note that the LDP proposes adapting the medium growth model and this is assessed as acceptable in the SA despite an annual allocation for new homes being greater than that recommended by South East Wales Strategic Planning Group (540 pa rather than 462 pa). We agree that the implications of adopting this level of growth will depend on a number of factors, such as where, how and when the proposed growth is implemented but it is one of the functions of the SEA to attempt to evaluate what the significant environmental effects of this might be. Further evaluation and refinement of the assessment can take place when this extra detail is available, however, by that stage it is highly likely that the direction of the preferred strategy will have already been set.

6.14 - 6.21 CCW does not disagree with the majority of the statements in this section relating to the likely sustainability effects of the three employment growth options. However, the comments made above in relation to the housing options are also applicable here. We note the rationale used for not carrying out a more detailed appraisal, set out in appendix 3, but feel that this does not address the requirements of the SEA to assess the significant environmental impacts of the proposals. We understand that to make too many assumptions based on lack of data could result in misleading outputs, but it is also true that unless some basic assumptions are made then there is a risk that the whole assessment might become subjective. In this instance, the four assumptions made in the appraisal do not include any environmental elements, despite all three options being likely to have a number of positive and negative environmental effects regardless of how they are implemented. To comply with the requirements of the SEA Regulations we would normally expect to see an analysis of how each of these growth options has been assessed (for example, against the SA objectives) to predict their potential impact on the environment.

We would also expect to see some form of justification and mitigation measures, with suitable caveats to cover the inherent uncertainties, where potential significant effects have been identified. We note that some of the questions raised in this section are clarified in later sections of the SA in relation to specific strategy elements and policies and the proposed mitigation for them. It may be possible to cross reference back to this section to help clarify the assessments made on the three growth options. We look forward to further consideration of this in future iterations of this document.

## **7 SA of Spatial Strategy Options**

The SEA Regulations require and assessment of alternatives as part of the evaluation process. We note that in section 7.4, the evaluation of the three strategic options were carried out by the plan preparation team using the LDP objectives and this is not included in the SA report. WAG guidance on preparing LDPs clearly states “Throughout the pre-deposit participation stage (LDP Regulation 14), authorities must undertake sustainability appraisal of the strategic options and work with the environmental consultation bodies (under the SEA Regulations) and stakeholders on an initial sustainability appraisal report. This will inform the decision making process and identification and development of the preferred strategy.”

We welcome that the SA does include an assessment of the strategic options using the SA objectives. However, as identified in the report itself (7.5), the separation of this process has led to a number of assumptions having to be made which may compromise the assessment to some degree. Whereas most of these may be reasonable, the assumption that “policies will be in place to mitigate against adverse impacts on the natural environment” is not compatible with the aim of assessing the respective significant environmental effects of the three options. It should be part of the role of this assessment to identify what form such policies might take and what they will need to consider with respect to each of the proposed options. In addition, the assumption that uncommitted allocations can be reviewed requires further clarification, as CCW considers that existing allocations within current local plans that do not have planning permission should not simply be rolled forward, but should be reviewed through the SEA process to ensure that they are sustainable.

7.6 CCW recognise that the SA/SEA process will develop as additional information on various elements, such as allocations or policy detail, becomes available. However, many of the wider environmental impacts can be assessed, with suitable caveats, even at this stage and it is important to consider these as part of the assessment. This is particularly important when considering potential significant environmental effects that the options may have on biodiversity and the natural environment, air quality, landscape etc. and what strategic policy options may be available and/or required to enhance or mitigate these effects.

### 7.8 Summary of impacts;

- Accessibility and air quality. We welcome the recognition of the importance of modal transport change as a key factor in assessing the three options’ impacts on air quality.
- The environmental impact of new housing has been assessed separately under the low, medium and high housing growth options. This should be cross referenced to this section as it may be that high housing growth in one area may be environmentally acceptable where as medium or even low growth in other areas might have significant environmental implications. Recommendations such as this should then steer the plan authors.

- Using previously developed land in preference to greenfield land, landscape soil and biodiversity impacts: While we appreciate that the detailed impacts of the three strategies will depend on the location of development sites, it would have been useful to have some assessment of the relative merits of the three options against generic impacts. CCW welcomes the clear identification of the importance of the four European and international sites and recommend incorporation of the findings of the HRA in this section where appropriate. Where such information is not yet available, a suitably precautionary approach should be applied with a clear indication of risks and concerns for those elements of the three strategies that indicate potential development that may affect these sites. As further information comes forward, CCW look forward to working with Bridgend CBC to ensure these elements are fully considered and incorporated into the SA/SEA process.

7.9 While CCW appreciate that it can sometimes appear “artificial” to recommend a particular strategy as the most sustainable option, it is important to identify where an option performs well or poorly against the indicators. This allows specific policies to be developed/amended, allocations influenced and guidance produced to influence the nature of the preferred strategy and the plan itself to account for strengths and weaknesses brought out in the assessment. This has been done to some extent within the assessment tables in appendix 4 but it would be useful to have this summarised within this section.

## **8 Sustainability appraisal of the strategy**

8.6 Porthcawl – CCW welcomes the identification of the environmental risks associated with this regeneration growth area, particularly the tidal flooding (links to the developing Shoreline Management Plan and Flood Risk Management Strategy) the possible loss of green space and the clear identification of Kenfig and Merthyr Mawr as possible constraints. The possible impacts on the Kenfig SAC will need to be fully considered in the HRA. The potential for impacts on the Merthyr Mawr, Kenfig & Margam Burrows Historic Landscape should also be considered.

8.7 Maesteg and Llynfi Valley – There may be positive environmental potential for elements of this growth area relating to improving access to natural green space and enhancing ecological connectivity as well as possible negative impacts on landscape and Historic landscapes.

8.9 Bridgend – CCW acknowledges the recognition of potential environmental risks as a result of the likely green field land take for this growth area. This will require suitable mitigation policies to ensure potential adverse effects are minimised and positive elements enhanced.

8.10 Strategic employment sites - CCW acknowledges the recognition of potential environmental risks as a result of the likely green field land take for the 4 strategic employment sites. This will require suitable mitigation policies to ensure potential adverse effects are minimised and positive elements enhanced. Given their location in the M4 corridor they should also take account of the Networked Environmental Region work being developed as part of the South East Wales Spatial Plan.

8.13 & 8.14 CCW strongly supports the recommendation to clarify the status of various allocation commitments being considered in the plan.

The inclusion of a table setting this out would be both informative, in terms of assessing residual distribution, and also give confidence that all relevant allocations are being fully considered by the assessment and not just “rolled forward” from previous plans.

8.15 CCW supports the recommendation that employment allocations need to be reviewed and then assessed as part of the SA/SEA process prior to final selection of strategic sites. In addition to the reasons listed this would also allow for further consideration of potential significant environmental effects for the various sites and recommendations being made to minimise adverse effects.

### **SA of the strategic policies**

CCW notes the concerns raised by the SA that some of the 15 policies proposed in the pre-deposit LDP may not contain sufficient detail to implement the strategy. We support the recommendations (subject to comments below) made by the SA/SEA report and look forward to seeing how the future iterations of the LDP take full account of them.

8.23 The assessment of policies for rural areas need to take full account of the key role rural settlements play in both general landscape and how increased integration into urban areas/ increased urbanisation itself can have significant environmental effects (for example loss of habitat connectivity, pressure rural resources, loss of access to natural green space).

8.24 & 8.25 CCW strongly supports the recommendations made in these sections in relation to energy efficiency, sustainable homes, renewable energy generation but would also add access to natural green space, sustainable drainage etc. We also support the need for clear and unambiguous policy wording.

8.27 Assessment tables – It would have aided use of these table if the classification of results had included a separate “+/-“ category in addition to the “?”. In some cases a “?+” or “?-“ has been used and often the description itself highlights key negative or positive elements within the assessment. However, to aid interpretation a distinction between truly uncertain assessments and those where there were a number of conflicting positive and negative effects should be made.

8.43 To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere – CCW notes with some concern that while a number of negative elements have been identified with specific reference to policy SP 6 and SP7 within the assessment tables, there is no overall assessment of the impacts of coal extractions and use on global green-house gas emissions. While we appreciate and support the focus of the SA on addressing local adaptation measures to climate change, the wider impact of policies should not be ignored. Given that the LDP objective reflects this in it’s wording (atmospheric integrity) we would also expect to see this reflected within the SA when assessing these policies.

### **9 Mitigation of Impacts**

CCW notes and supports the recommendations for mitigation contained in this section. In addition to these general mitigation measures, we would also strongly recommend that the LDP take full account of the recommendations and assessments contained with the assessment tables themselves (appendix 5). We look forward to future iterations of this SA report setting out how these recommendations have been dealt with by the Plan authors.

## **10 Monitoring**

CCW supports the approach suggested for developing a monitoring framework for the SA/SEA and the LDP. We would recommend the development of a suite of indicators and targets based on the key likely significant environmental effects of the plan, as identified in this assessment, but acknowledge that this will be limited by the lack of defined indicators at this stage. We look forward to commenting on these indicators as they are developed in further iterations of this assessment.

## **11 Conclusions and recommendations**

11.3 It should be noted that while potential negative environmental impacts are inevitable in the production of an LDP it is the function of the SA/SEA process to help identify, quantify and, where possible, avoid or mitigate for them. The current SA goes a long way towards achieving this, subject to a number of assumptions and procedural issues covered above, and this should be emphasised within this section, as should the need for the LDP to take account of these recommendations.

11.4 It is an important role of the SA/SEA process to determine whether the levels of growth proposed by the preferred strategy are fundamentally sustainable or not and what alternative strategies might offer. Even if a “high growth” option is selected, the LDP can still show how it is avoiding/limiting any negative effects by taking on more sustainable elements from these other options or how these negative elements are being addressed in response to the assessment of specific policies and objectives. This needs to be clearly set out in the SA/SEA and the plan itself needs to show how this has been taken on board.

11.6 CCW welcomes the recognition of the need to address environmental issues as part of the continuing plan development, particularly the need to assess potential impacts on European and international sites.

11.9 See comments on section 9, CCW will be expecting to see how the recommendations of the SA process, plus the points that we raise in response to this consultation, are reflected in the future iterations of Bridgend LDP.

# **Countryside Council for Wales**

## **Habitats Regulations Assessment**

### **Other Natura 2000 sites and Ramsar sites in 15km of County Borough Boundary**

A new HRA appendix will be prepared to take into demonstrate the reasons why only these four sites were considered in detail – and others eliminated from further investigation. The main reasons for this are mainly due to distance – making impacts unlikely or very difficult to attribute to development in Bridgend. For example, sites such as Cwn Cadlan SAC, Coed Nedd a Mellte SAC and Blaen Cynan SAC are most likely to be adversely affected by direct disturbance or possible water table changes – but development in Bridgend is ‘downstream’ of these are therefore unlikely to be an impact. Sites such as such as Crymlyn Bog SAC/Ramsar is quite distant from Bridgend and the impact of development in Port Talbot will be a much greater influence, that that of Bridgend.

There is the possibility that increased traffic from Bridgend County Borough on the M4 and A4054 could have air quality impacts on the Cardiff Beech Woods SAC. However, given the numerous other developments in south Wales, demonstrating impacts of development in Bridgend is not possible, and therefore screened out.

The appendix will be less detailed than the site form for other Natura 2000 sites (and Ramsar), simply setting out their reasons for designation, vulnerabilities and reasons for being screened out of the HRA.

### **Correction for Kenfig SAC**

We note the need to differentiate between priority features and primary reasons for designation, and the need to clarify that management of the dunes is as important as sediment supply. Changes will be made in a revised HRA.

### **Re-screening**

Detailed policy screening will be necessary as the LDP develops. However, we will screen out impact on sites outside the County Borough – including Dunraven Bay SAC.

### **In-combination impacts**

It is agreed that it is important for the HRA to pick-up in-combination impacts. However, this process needs to be kept manageable. Impacts in particular that continuing with the HRA of LDP will need to consider are with waste and minerals planning (part of the LDP), transport plans (also likely to be part of the LDP) and water resource planning.

### **Sustainability appraisal**

### **Meeting the requirements of the SEA Directive/Regulations**

In the SA/SEA of the Deposit SA/SEA a table will be included demonstrating how the regulatory requirements of the SEA process have been met.

### **Schedules of consultation**

SA reports will include a schedule of consultation. A summary of changes following scoping consultation were included as an appendix for the final scoping report.

### **SA of the Vision and Objectives**

Following the comments of CCW the appraisal of the objectives has been reviewed. The revised appendix is included as an attachment. The CCW comments remark that additional work may have gone into the appraisal of LDP objectives that has not been shown, this is not the case. These are objectives for the Plan and do not set policy – therefore, their only real significance in moving towards sustainable development is whether they are fully carried through into LDP policies and proposals. More detailed appraisal is also difficult given that these are objectives and it is not always clear what implementing them will mean for development. Therefore, we feel the level of detail in the appraisal of objectives is appropriate for the task, and do not propose to look at these in any further detail. However, if a revised set is prepared for the LDP Deposit the SA will need updating.

### **SA of Growth Options**

CCW note that they were not consulted on the appraisal of growth options. This was due to the timetable of LDP preparation and it was the Council's decision on how consultation was undertaken at that stage.

The CCW is welcome to comment on the SA of the growth options (and the options themselves).

**Comments on 6.3-6.8:** It is agreed the SA should refer to the significant environmental effects of the various options. However, this could not be very precise given the very different ways the options could be implemented. As CCW identifies this section does not include mitigation suggestions. It may be possible to include these here, however, mitigation of impacts is included in the policy appraisal. We believe that this level of detail is most suitable here, and would hope the Council takes these suggestions into account in moving forward with the LDP.

**Comments on 6.11 – 6.13:** CCW notes that there should be appraisal of the implication of the preferred growth option. This is not included in this section of the SA but is part of the appraisal of strategic option in Appendix 4 and the appraisal of policies.

**Comments on 6.14-6.21:** CCW note that more detailed appraisal should be carried out of the employment options. The difficulty with additional appraisal was the detailed review of sites had not been completed at the time of the SA of options, therefore the SA was based on limited evidence. The SA identifies that this may be a problem in defining a sustainable strategy for the LDP, as is the level of existing commitments.

We agree with the CCW comments of the SA/SEA being an iterative process with plan making. Therefore, would recommend the Council make sure they put in place the mechanisms for this SA to influence plan making during any continued evolution of strategy, preparation of policy and choice of allocation.

The CCW comment that certain elements of the assessment seem to have been carried out separately to the SA/SEA. It is not clear what is meant by this comment, it is true that options appraisal was undertaken prior to this first formal reporting stage. However, this was to fit with the LDP preparation process and the appraisal of options is necessary to meet the SEA Regulations. Options appraisal was part of the internal iteration of SA and LDP preparation.

### **Existing commitments**

The SA agrees with CCW comments of the difficulties of existing commitments, meaning that some impacts of development are inevitable. The sustainability impacts of existing commitments will need to be a consideration of moving forward with the LDP to Deposit.

### **Comments contained Annex 1 of CCW response (and not covered above)**

**Change log:** A 'change log' of how the SA comments and recommendations could help demonstrate how the SA has been used in plan making. This would need to be prepared by plan makers.

**Comment on 3.1:** It is not clear how the sustainability objectives do not meet the legal requirements. All of the matters listed in Schedule 2 of the SEA Regulations (Wales): biodiversity (including flora and fauna), population, human health, soil [land], water, air (climatic factors), material assets [energy, minerals], cultural heritage including architectural and archaeological heritage [built environment] and landscape.

**Comment on 3.2 – 3.3:** The SA specifically chose to limit the consideration of 'other plans and programmes' to those with specific relevance to the SA and LDP. This is to avoid long lists of policies and programmes that add little to the SA process. Therefore, this does not include many international and national legislative requirements, nor lists of national strategies where relationships with planning in Bridgend are very limited.

**Comment 3.11/3.12:** This point is noted – suggested indicators will be incorporated into monitoring proposals for the next stage of SA.

The sustainability framework will be updated for the next stage of the SA, this is likely to be reworking of the 'supporting objectives' to 'decision making criteria'. This will give the desired direction of change for each objective that would represent a movement towards more sustainable development and therefore be more self-explanatory for the sustainability appraisal.

**Comment 3.13:** Consideration of compatibility will be included in moving forward with the SA.

**Comment on table 3.1:** The update of the sustainability objectives will include some additional material suggested by CCW. This includes greater emphasis on natural open space, enhancing habitat connectivity, new sub objective on air quality,

Those where we may not make a change in response to CCW comments: identifying the need for significant development to have suitable historic landscape assessment (although this point is noted and will be considered in relation to the SA of any policy relating to historic landscape), assessment of environmental impacts of minerals proposals are covered through other objectives.

**Comments on section 4:** The purpose of SEA is noted, additional wording will be incorporated in this section in moving forward with the SA of the LDP.

**Comment on section 7:** The SA consultants also undertook an SA of the spatial options (shown in Appendix 4), this covered similar matters to the Council's own appraisal but from an independent viewpoint. We would be reluctant to include the Council's SA in the SA report – as the LDP preparation and SA are intended to be independent (yet inform each other). It is the view of the SA that the findings in the SA report (Appendix 4) should be taken into account by the LDP team. The process for consulting on options was determined by the Council.

Details of mitigation policies are given in Appendix 5 and section 9. For the appraisal of the options an assumption has to be made that they would be delivered according to mitigation policies, eg protecting and enhancing biodiversity, historic heritage, avoiding pollution impacts etc. without this the appraisal would be too difficult to manage and identify the most noteworthy differences in delivering sustainable development between alternatives.

The need for as full as possible review of commitments is raised by the SA as a significant factor in delivering a sustainable spatial strategy, and one that is noted might be a limitation of any strategy pursued.

**Comment on 7.8:**

*Accessibility and air quality:* This comment is noted. The appraisal of options is based on different distribution of development around the County Borough (where this information is available), and therefore reflects the relative impacts of high growth in one area vs low growth in another.

*Using previously developed land:* Information on the quantity of greenfield land required is very difficult to establish from the information available at the time of the appraisal. Appendix 4 does include some details of the relative impacts of each option.

**Comment on 7.9:** Noted.

**Comment on 8.6:** Noted – comments will be incorporated where suitable in moving forward with the SA.

**Comment on 8.7:** Noted – comments will be incorporated where suitable in moving forward with the SA.

**Comment on 8.9:** Noted – comments will be incorporated where suitable in moving forward with the SA.

**Comment on 8.10:** Noted – comments will be incorporated where suitable in moving forward with the SA – particularly in relation to Networked Environmental Region work.

**Comment on 8.13 and 8.14:** The SA agrees that more detail needs to be presented on commitments. This should be part of the LDP or as a publicly available evidence base for the LDP. The SA could therefore comment on the suitability of these sites and their review.

**Comment on 8.15:** Noted – agreed.

### **Comments on SA of policies**

Agree with CCW that policies may need to be clarified and improved to implement sustainable development.

**Comment on 8.23:** Noted – comments will be incorporated where suitable in moving forward with the SA.

**Comment on 8.24/25:** Noted

**Comment on 8.27:** A '•/x' etc symbol will be used in future to indicate where impacts can be both positive and negative – rather than a '?'.

**Comment on 8.43:** This point is noted. However, it is difficult for the SA to say if constraining the supply of coal would also constrain demand. If demand is not managed then environmental effects of importing coal from other countries may be higher – especially where there a less rigorous safeguards and controls on operation and management.

**Comment on 9 and 10:** Noted.

**Comment on 11.4:** This point is noted.

## **Comments from the Countryside Council for Wales**

## **Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)**

EAW have not been consulted on the production of the SEA document. We hold background data on a number of environmental issues within Bridgend County Borough which has been offered to the Local Authority's consultants. The scope of this information was previously agreed with your Officers.

To date we have not been contacted by your consultants and as such we have concerns over the accuracy of the SA and SEA documents. We would highly recommend a session between EAW, yourselves and your consultants to go through the issues. Subsequently, we will be able to provide you with written observations on this aspect of the plan. Attached is a copy of the EAW's Local Evidence Pack for Bridgend, which as stated above, should be used to inform the SEA.

## **Habitat Regulations Assessment (HRA)**

The HRA concludes that there is a potential negative impact upon Kenfig, Crymlyn Bog, Cefn Cribwr Grasslands and Blackmill Woodlands and that further assessment is needed. EAW would support this conclusion and have some comments on the potential scope of further assessments and issues to be looked at.

Potential development areas along side SAC sites as highlighted within the HRA will have consequences upon water quantity, water quality and air quality. EAW has a permitting/consenting role in all these areas. Additional consents may cause strain upon the resources available and may have a knock on impact upon the SAC sites, either alone or in combination impact.

Potential water abstractions and discharge requests arising from any development could impact upon the SACs, as stated in the HRA. Any additional consents should be subject to individual HRAs or CRoW assessments where appropriate. The Environment Agency and Welsh Water should be consulted under the Review of Consents for each individual SAC site. At present the reviews for Kenfig, Crymlyn, Blackmill Woodlands and Dunraven Bay are currently available on request from EAW.

Most of the SACs are currently at risk or are impacted from poor air quality (acid and nutrient deposition). Increases in development, industry and traffic within areas close to SACs would further contribute to acid and nutrient deposition with critical loads being further exceeded. Air Quality Assessments have been completed for SAC sites and are available as part of the site reviews. This is also a concern of CCW and they will make additional comments on this matter.

Your Authority should be made aware that the Environment Agency's Corporate Strategy is currently under review. The strategy will highlight our key areas of work over the next five years (2010-2015) and will give you some background as to why we have raised certain issues/topics. It may be prudent to include this within the 'Other Plans and Strategies' section.

This letter sets out our main areas of concern, if you have any queries please do not hesitate to contact me.

In addition to our above comments, we have experienced problems with accessing information/documents from your website. If this is an ongoing problem, we would be grateful if any consultation documents can be sent by CD or hard copy in the future.

Yours sincerely



**Miss Bonnie Miles**  
**Planning Liaison Officer**

Direct dial 01792 325532

Direct e-mail [Bonnie.Miles@environment-agency.gov.uk](mailto:Bonnie.Miles@environment-agency.gov.uk)

## Environment Agency Wales

The comments from the Environment Agency Wales (EAW) on the SA primarily relate to the use of their data in the appraisal process. This is noted and this additional material will provide an essential information source in moving forward with LDP preparation and to support the SA. The SA will continue to seek inclusion of policies in the LDP relating to the protection of water quality and resources, as well as other issues such as avoiding air pollution.

For the HRA the comments relate to the role of EAW in granting permissions and consents. The role of the EAW is noted and one that the LDP preparation team must take into account in developing proposals for the plan area.

### Comments on the Habitats Regulations Assessment (screening)

**Comment:** The EA support the finding there may be impacts on the Natura 2000 sites.

**Response:** Noted

**Comment:** Where a protected site could be affected by water quantity/quality or air quality EA could a permitted/consenting role. Additional consents may cause a strain on the resource.

**Response:** Noted

**Comment:** Potential water abstraction and discharge requests from development could impact on the SACs, as stated in the HRA. These will be subject to individual HRA or CRoW assessment where appropriate. The EA and Welsh Water should be consulted under the Review of Consents for each individual SAC site. Reviews for Kenfig, Crymlyn, Blackmill Woodlands and Dunraven Bay are available on request from EA.

**Response:** This is noted. If necessary these Reviews of Consent could inform the SA and the EA should make these available to the LDP team.

**Comment:** Most of the SACs are currently at risk or are effected by poor air quality. Increase in industry and traffic in the areas near the SACs could lead to further contribution to air quality impacts. Air Quality Assessment are completed for these sites.

**Response:** The HRA includes detail of air quality risks on sites. It will continue to urge the LDP preparation team to consider the air quality impacts on vulnerable sites.

### Comments on the Sustainability Appraisal

**Comment:** The Environment Agency Wales hold information on the environmental issues in Bridgend County Borough.

**Response:** SA team have received the information and will ensure it is referred to in moving forward with the SA.

**Comment:** Concerns over the accuracy of the data used in the SA.

**Response:** The data has been reviewed and although there are gaps in the data used for the sustainability appraisal there are no conflicts. The SA will seek to ensure that the flooding and water quality issues are properly covered in the LDP during all stages of preparation.

## **Comments from other individuals / organisations**

## Comments on the Sustainability Appraisal

Comments on the SA primarily relate to detailed matters on the content of the SA. Other comments, although written as a response to the SA, are matters for the LDP team to take into account in moving forward with the plan and developing policies. These comments will provide a useful source of information in moving forward with subsequent stages of the SA.

**Comment:** The SA has a bias in favour of wind power.

**Response:** The LDP does not include detailed policies yet and therefore there has been no opportunity to appraisal specific renewable energy options or site allocation. The SA is in support of lower carbon energy, but this could be from a variety of source, including small scale generation associated with individual buildings or groups of buildings. This could include wind energy as an option, but also solar power, ground source heat pumps and alternative fuels.

**Comment:** Agree with the SA that appropriate waste water treatment infrastructure will have to be in place to avoid impacts on water quality from new development.

**Response:** Noted.

**Comment:** No mention of sustainable drainage systems to reduce flood risk.

**Response:** The SA Infrastructure policy SP15 (in Appendix 5) identifies the need for the policy to refer to sustainable drainage systems to reduce flooding.

**Comment:** No mention of the Water Framework Directive.

**Response:** The SA does refer to the need to protect the water environment as one of the overarching objectives for the SA. This will include complying with the water framework directive.

**Comment:** We see no need to maintain coal stocks. It is hypocritical to talk about sustainability if future opencast is allowed, as opencast can never be sustainable it is only profitable to private open cast companies, is damaging to health and wellbeing and the environment, provides little employment or wealth to the localities that are directly affected by the development.

**Response:** This point is noted. However, it is difficult for the SA to say if constraining the supply of coal would also constrain demand. If demand is not managed then environmental effects of importing coal from other countries may be higher – especially where there a less rigorous safeguards and controls on operation and management. The SA will endeavour to ensure that policies are in place to reduce the impacts of coal extraction on local communities and the environment, through planning conditions and controls. As well as policies to help reduce energy demand in the County Borough. National policy requires coal resources are safeguarded from sterilisation, but this policy does not presuppose their extraction.

**Comment:** Air pollution from industry such as opencast should also be reduced and recognised as having huge impacts on local communities and their health and wellbeing.

**Response:** More detailed stages of appraisal will seek to ensure the LDP contains policies on protecting local communities from adverse air pollution impacts and hazard.

**Comment:** When an area is rich in biodiversity and habitats but not protected we would hope Bridgend can recognise the importance and value of such an area to local communities.

**Response:** The SA will seek to ensure the LDP contains policies to value biodiversity wherever it is found and that all new development sites should seek to incorporate biodiversity enhancement measures.

**Comment:** Any development on greenfield sites should be disallowed.

**Response:** Previously used land is a priority for development. However, greenfield sites will be needed to support the demand for new homes in Bridgend, including from the existing resident population.

**Comment:** Concern of the potential contamination of the lower Ogmore River due to run-off, we endorse that this requires continuous monitoring.

**Response:** The SA will include water quality targets as part of the monitoring framework. Water quality will continue to be monitored by the Environment Agency.

**Comment:** Agree with the findings of the SA that over-allocation of employment land may lead to development in less sustainable locations and could mean that greenfield land allocations are taken up in preference to previously developed or town centre sites. Fewer sites should be allocated for employment.

**Response:** Noted.

**Comments on the SA of greater relevance to LDP preparation:** no greenfield development, no opencast mines, sustainable drainage systems, serious concerns about the erosion of the coast line due to dredging, extensive flooding (with greater frequency) on the fields south of the A48,

**Other comments:** promote Green Gyms to protect the environment, give higher importance to agricultural land and farmers should diversify

## Comments on the Habitats Regulations Assessment Screening

The majority of comments on the HRA relate to detailed matters. Comments on the HRA also need to be taken into account by the LDP team in moving forward with plan preparation.

**Comment:** The HRA fails to address the wind energy development proposed by WAG.

**Response:** This HRA cannot address national policy, including the strategic search area for wind energy. However, it may be suitable for the HRA to consider 'in-combination' effects on the internationally designated nature conservation site in proximity to the search area.

**Comment:** HRA maps are illegible.

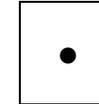
**Response:** To keep file sizes down the site maps have to be quite low quality, although these clearly show the site boundaries. The buffer zones show the areas of key settlements as labels on the maps – and therefore should be legible.

**Comments on the HRA of greater relevance to plan making:** The LDP needs to secure the prevention of any further development in the countryside near the Merthyr Mawr Warren. This will ensure that the LDP protects the integrity of the Merthyr Mawr Warren and does not provide the opportunity for additional detrimental impacts which may alter an otherwise acceptable screening conclusion for this SAC.

**Appendix 1**  
**Sustainability appraisal of the Local Development Plan Objectives**

### Key to appraisal symbols

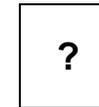
The LDP objective is compatible with the sustainability objective and likely to contribute to the achievement of greater sustainability



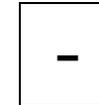
The LDP objective is likely to detract from the achievement of greater sustainability according to the identified sustainability objective



The LDP objective does have a relationship with the sustainability objective, but the exact nature of this is complex or unpredictable, or multiple impacts potentially both positive and negative



No identifiable relationship between the topic covered in the policy and the sustainability concern



	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
<b>PLACES</b>																
<b>OJ1a</b> Bridgend as a regional hub	●	?	-	?	?	?	?	●	-	-	?	-	-	●	●	This objective should help to increase accessibility to new jobs, homes and services by providing a central focus for these developments. However, without maintenance and enhancement of travel choices, there could be adverse impacts on accessibility of these developments for residents of those settlements in the County Borough with poor access to Bridgend town. This objective may require the expansion of the town onto peripheral green land, with the risk of adverse impacts on biodiversity and landscape.

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
<b>OB1b</b> Revitalise Maesteg	?	?	?	●	?	?	●	?	-	-	?	-	-	●	?	Delivering new development in Maesteg is essential in revitalising the role of the second largest town in the County Borough. It needs to be the focus of a large proportion of new development to reinforce its role as the main service centre for the Llynfi Valley. This obligation should help provide accessible jobs and services for the existing and future residents of the area. It will be necessary to ensure the allocation of land for new development can demonstrate deliverability and is meeting the needs of developer. This is essential in order to secure the necessary regeneration of the area. This objective may require the expansion of the town onto peripheral green land, with the risk of adverse impacts on biodiversity and landscape.
<b>OB1c</b> Porthcawl premier seaside resort	?	?	-	?	?/X	?/X	●	?	?	-	●	-	-	●	●	Focus on Porthcawl as a tourism destination should help improve local wealth creation, although it will be important to ensure this includes the creation of high quality jobs and higher spend visits. Development should also proceed in a way that does not harm the biodiversity assets, including local internationally protected sites, nor the high quality landscape character, although there is the risk of harm in this sensitive location. Regeneration of the waterfront should help provide new homes, make efficient use land and improve the built environment character; development will have to

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																take into account risks of tidal inundation. The LDF should identify new employment sites.
<b>OB1d</b> Realise potential of the Valley Gateway	●	-	-	?	?	?	-	?	?	-	?	-	-	●	●	There is potential for the Valley Gateway to be a focus of development that has good access by public transport. Development in this location will need to reduce impact of additional transport on from development on the M4 corridor. At least part of the site identified for development in this area are currently used for community use, including playing fields, should be retained for this community use. This area is also important to the current economy of the County Borough and identifying additional employment land may be necessary.
<b>OB1e</b> Reduce traffic growth etc.	?	-	●	●	●	-	●	●	●	-	-	-	-	?	?	If successfully implemented this objective should help meet several sustainability objectives. Central to achieving this, is for the LDP policy and proposals, to help support a variety of travel choices and promote development that reduces the overall need for travel. Aiming to reduce air pollution from transport can have benefits for human health and sensitive natural habitats.
<b>OB1f</b> Integrated transport solutions	?	-	●	●	●	-	●	●	●	-	-	-	-	?	●	This objective is closely linked with OB1e. Achieving integrated transport can have a variety of benefits including reducing the number and length of car journeys, helping to promote equitable access, and reducing congestion and resultant impacts on environmental quality. Aiming to reduce air pollution from transport can

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																have benefits for human health and sensitive natural habitats.
<b>ENVIRONMENT</b>																
<b>OB2a</b> Natural and built environment	-	-	?	?	●	●	●	●	?	●	?	?	-	-	●	There is a clear positive relationship between this objective and sustainable development. However, in some instances it may conflict with meeting other objectives relating to growth and change. Preserving the quality of the natural environment also helps in protecting a vital economic asset to the region, attracting visitors and investment to the County Borough.
<b>OB2b</b> Tackle poor air and water quality	?	-	●	-	●	-	?	●	?	●	-	-	-	-	?	This is a positive objective for the LDP, although as with OB2a it may not be entirely in the control of the plan. Achieving this objective will also require road traffic to be reduced to help improve local air quality. Aiming to reduce air pollution from transport can have benefits for human health and sensitive natural habitats.
<b>OB2c</b> Manage risk and fear of flood	-	-	●	?	?	?	-	-	●	?	-	-	-	-	?	Avoiding the risk of flood through careful siting and design of development is essential in achieving safe, healthy development. Recognising the importance of reducing the fear of flood is also positive in helping to protect residents' mental wellbeing, as well as their physically wellbeing during flood events. There is the potential for this objective to have benefits for the landscape and biodiversity, through the

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																creation of new water features, such as ponds and swales that can provide valuable habitats and attractive features in the landscape.
<b>OB2d</b> Mineral resources and waste	-	-	-	-	?	?	-	-	?	-	?	●	-	-	?	There may be some potential conflicts of meeting objectives to safeguard minerals and those of relating to growth. The LDF must identify ways of implementing sustainable waste management, including through appropriate site allocations for new waste managements facilities.
<b>OB2e</b> Contribute to energy needs	-	-	-	-	?/ X	?/ X	?	?	●	-	-	●	●	-	?	Meeting energy needs through provision of renewable energy should bring a variety of benefits in achieving sustainable development, related to air quality, climate change, energy use and minerals. Depending on the type and scale of renewable energy development there may be some adverse impacts on the local environment, to be weighed against global benefits. There is also the risk of impacts on biodiversity.
<b>REGENERATION</b>																
<b>OBJ3a</b> Diverse economy	?	-	-	?	-	-	-	-	-	-	-	-	-	●	●	These objectives should improve the resilience to economic changes, and provide a range of jobs to meet various needs of the resident workforce.
<b>OBJ3b</b> Realistic level and variety of employment land	?	?	-	-	?	?	?	-	-	-	?	-	-	●	●	Providing the land necessary to meet the diverse needs of the economy could help improve economic investment and endemic business growth in the County Borough. However, achieving the mix and quantity required by the market does risk environmental impacts, such as

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																loss of greenfield land (with landscape and biodiversity impacts). It also potentially puts employment in locations that may have good access to the national road network, but less good access to employment sites for the resident workforce of the County Borough. De-allocated, or re-allocating employment land for alternative uses may help make the best use of land. Therefore, the LDP policy should consider the benefits and impacts of identifying additional sites, or re-allocating employment land.
<b>OBJ3c</b> Regeneration of Valley Communities	•	-	-	•	?	?	-	?	-	-	?	-	-	•	•	The valley communities, for the most part, share characteristics related to their coal mining history. In all there are issues related to access to employment and local services, and have areas of high deprivation. Some are also constrained in terms of land suitable for growth. New development to aid regeneration should be focused in these areas – tailored to meet the needs of local residents, whilst maintaining and enhancing transport links (affordable) with major service centres.
<b>OBJ3d</b> Encourage tourism	-	-	-	?	?	•	•	?	?	-	-	-	-	•	•	This objective recognises the importance of high quality places in attracting investment and visitors to the area. This should aid in wealth creation, as well as helping to protect environmental assets. However, increasing visitor pressure in some locations could have adverse impacts on biodiversity.

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
<b>OBJ3e</b> Bridgend centre as a retail destination	?	-	-	-	-	-	•	?	-	-	-	-	-	?	•	Bridgend town centre has the potential to provide a better retail offer. This could help reduce peoples' need to travel to other shopping centres, potentially reducing number and length of car trips.
<b>OBJ3f</b> Support viable town and district centres	•	-	-	•	-	-	-	?	-	-	-	-	-	?	?	It is essential that the villages of the County Borough each retain a community focus in the town centres. The LDP should include policies and proposals that support existing services in these location, and allocations that encourage new provision.
<b>COMMUNITIES</b>																
<b>OBJ4a</b> Meet needs of deprived communities	?	?	?	?	-	-	-	-	-	-	-	-	-	?	-	This objective covers similar issues to OBK3c, although with more of a social emphasis. It is hoped that this objective could achieve a variety of benefits for the deprived local communities, including provision of affordable homes, strengthening of existing communities, and improving health and wellbeing. Achieving these outcomes will depend, to some extent, on the implementation of other plans and strategies to address these issues.
<b>OBJ4b</b> Equality of access to services	•	-	•	•	-	-	-	-	-	-	-	-	-	?	-	Achieving this objective is essential in order to deliver the social progress objectives of sustainable development, as equity is central to this concept. Providing accessible services can have benefits now and in the future to the residents of the County Borough, with benefits in

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																terms of education, access to work and healthcare.
<b>OBJ4c</b> Deliver housing to meet need	?	•	•	•	?	?	-	-	-	-	-	-	-	-	?	The delivery of housing is a principle goal of the LDP. Part of this provision will be delivering homes to meet the needs of all residents. Therefore, it will be necessary to provide good quality affordable homes in all parts of the County Borough, with particular emphasis on delivering new homes where this type of provision is currently lacking. Providing homes for all can have a variety of benefits in terms of achieving sustainable development, including health and wellbeing, community development and a providing for a resident workforce. New homes are likely to require new greenfield sites for development, with the potential for adverse landscape or biodiversity impacts.
<b>OBJ4d</b> Provide community facilities	•	-	•	?	-	?	?	-	-	-	-	-	-	-	-	Background information shows that there are areas of the County Borough currently underprovided for in terms of playfields and children's play space. These deficits need to be resolved, with new quality spaces provided where necessary through the LDP, with policies in place to ensure the long-term upkeep of these areas.
<b>OBJ4e</b> Protect smaller shopping centres	•	-	-	•	-	-	-	-	-	-	-	-	-	-	?	Protecting local shops is essential in maintaining local communities and in reducing the need and distance travelled to meet day-to-day needs. This objective is closely related to OBJ3f. Shops

