

Bridgend Local Development Plan

REPRESENTATIONS by Representor

c/o Greenfields Land Reclamation Wales Ltd

V S & D S

Hughes & Owen

5 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

Laleston Community Council

REPRESENTATIONS by Representor

Mr T

Lardeau-Randall

42 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes	<p>Yes - It is an important document and the timescale for reporting back to BCBC was inappropriate, especially if one attempts to check the cross references / sources in the document.</p> <p>There is no mention about reaching a saturation point on greenfield sites, especially within the Bridgend area, nor the need to invest resources in outlying areas.</p> <p>Page 10 - 3.20 First Bullet Point</p> <p>"Only in exceptional circumstances" should be reworded "only in national emergencies"</p>	<p>The statutory time period for comments was given. The LPA address timescales for the stages of LDP preparation in its Delivery Agreement.</p> <p>This matter will be part of the SA process itself, as making efficient use of land is a sustainability objective for the process</p> <p>The wording comes from a legislative requirement and therefore cannot be changed to "national emergencies", although additional wording has been added for clarification.</p>	

Bridgend Local Development Plan

Countryside Council for Wales

REPRESENTATIONS by Representor

Dr Maggie

Hill

55 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1		<p>2.2 Re use of the term 'sustainable development', see comments on 1.2, 1.5 and 1.7. The SEA component of the SA/SEA 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 the plan.</p> <p>2.5 Re use of the term 'sustainable development', see comments on 1.2, 1.5 and 1.7.</p> <p>2.7 The SA/SEA must cover all aspects of SEA as required by Annex 1 of the SEA Directive including the appraisal of alternatives. It is not clear from the approach outlined in the scoping document that this will be the case.</p> <p>The sentence 'the appraisal of alternatives will consider the relative effect of implementing the various options although due to the high level and strategic nature of these the approach will be based on a commentary of their likely effects in relation to the objectives for sustainable development' needs to include clear references to what options are being considered, we are assuming that it is the plan itself, as well as the various component schemes and policies? Given that this scoping document is placing a very strong emphasis on sustainability issues, however, there is a danger, that the SEA component will be weakened and not in conformity with the SEA Directive/Regulations. The 'objectives for sustainable development' mentioned in his section may not equate to desired/required objectives for SEA.</p> <p>2.9 CW would suggest that another possible alternative could include 'whether development is appropriate'.</p> <p>2.12 The statement that 'the LDP is unlikely to have an effect on any of these (European) areas' may not necessarily be incorrect but is also not wholly acceptable. Bridgend is required to undertake tests of significance in relation to their European sites, (and any other N2K sites which may be affected but are outwith the plan area). These 'tests of significance' must consider direct and indirect effects and in combination effects with other plans and programmes.</p>	<p>(2.7) 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'.</p> <p>(2.7) 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.</p> <p>(2.9) 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 usual' approach will be considered.</p> <p>(2.12) 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.</p> <p>(2.13) Action: text amended.</p> <p>(2.14) Action: reference included</p>	

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Any test of significance should be considered/examined by CCW. It would not be appropriate (or useful) for Bridgend to pursue an LDP/SA/SEA without considering AA (and the precautionary principle) at a very early stage. It should be further noted that where it is unknown or cannot be clearly demonstrated that a plan (or policies contained within it), alone or in-combination with other plans and programmes, does not have a significant effect on an N2K site, then AA should be undertaken.

You should also note that if this process cannot conclude that the plan will not adversely affect the integrity of a site, it should not proceed – unless there are no alternative solutions and its needs to be carried out for imperative reasons of overriding public interest (IROPI).

The approach outlined in Section 2.12 would therefore appear to be insufficient to satisfy the requirements of the Habitats Directive.

2.13 In the third sentence add 'assessment and' before 'reporting'. In the fourth bullet point add 'and SEA' after sustainability. See comments on 2.7.

2.14 This section should include reference to the need for 'appropriate assessment' in accordance with the Conservation (Natural Habitats & c)(Amended) (England and Wales) Regs 2006 and 42/2004/EC.

2.15 This section should include reference to the need for 'appropriate assessment' in accordance with the Conservation (Natural Habitats & c)(Amended) (England and Wales) Regs 2006 and 42/2004/EC.

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Q2

3.6 CCW agrees in principle with this section, however, clear and obvious gaps in baseline data should be identified. In the event that 'missing' baseline information becomes available during the course of the assessment and plan making process then information gaps can be filled.

3.11 With regard to the statement 'the landscape quality of the County Borough should be maintained and wherever possible enhanced. In addition the value of the wider landscape should be maintained...', CCW would welcome clarification as to what are the perceived differences between landscape quality and the value of the wider landscape.

This section refers to 'Special Landscape Areas' but makes no reference to the Local Conservation Areas discussed in section 3.10. CCW would further suggest that, in the light of the information in section 3.9, further consideration is given to the implications of this Plan upon agricultural areas, which represent 44% of the Plan area. Common land, which is important in its own right, as a landscape component, agricultural resource and fundamental part of the historic landscape, should also be given greater consideration, together with the coastal zone and seascape in addition to consideration of the Heritage Coast.

Landmap characterisation of the Bridgend area is based on a pre 2003 version of Landmap. At present, Landmap coverage of the Bridgend area includes 4 layers, although the visual and sensory layer of Landmap is in preparation. This should be acknowledged in the scoping document.

The following landscape elements should also be considered:

- Light pollution/night blight,
- traditional field systems,
- woodlands/trees,
- urbanisation of rural areas,
- tranquillity etc.

3.15 This section, on appropriate assessment is very weak and needs strengthening to more accurately reflect the requirements of the Habitats Directive in terms of 'significance' and the following:

- 'effects' of the plan alone or in combination
- where it is unknown or cannot be clearly demonstrated that a plan (or policies contained within it), alone or in-combination with other plans and programmes, does not have a significant effect on an N2K site, then AA should be undertaken.
- That tests of significance and appropriate assessment should be considered for sites outwith the Plan area, but may still be significantly affected (alone or in combination) by the plan and policies within it.
- Potential issues of IROPI and compensatory habitat

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(3.6) Action: a reference to update has been made

(3.11) 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.

(3.15) 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.

(3.20) Action: an addition has been made to this implications section of the baseline information, to set out the requirement for appropriate assessment.

(3.21 - 3.26) Action: TAN references added, and the addition of specifics as ways of adapting to climate change.

(3.27 - 3.36) 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.

(3.37) Action: none leakage is controlled by the water utility companies, not the LDP.

(3.39 - 3.40) Action: cross referenced to the climate change section that contains relevant details.

(3.41) Action: refer to both.

(3.45) Action: there is a lack of available data on other pollutants for Bridgend, now noted in the paragraph.

(3.47) Action: Clarified.

(3.51) Action: now covered within other objectives.

(3.52) Action: Now covered in landscape section. Some basic statistics have been added.

(3.55) Action: Amended.

(3.57) Action: CCW Greenspace Guidelines reviewed and changes made where relevant

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We strongly recommend that you refer to the attached CCW guidance document: The Appropriate Assessment of Plans in Wales under the Provision of Part IV of the Conservation (Natural Habitats &C) Regulations 1994, David Tyldesley and Associates, Report to Countryside Council for Wales, March 2006. The final version of this guidance will be available from the Welsh Assembly Government in the near future.

3.20 Re: bullet point one, see comments above on 3.15. The objectives need to be strengthened in relation to the Habitats Directive. Re: bullet point two, include cumulative, synergistic effects etc.

3.21-3.26: Although these sections cover the two main areas related to climate change, namely reduction of substances that contribute to climate change and avoidance/mitigation of impacts of climate change, there is a need to improve the overall level of detail and coverage. Implications for the plan should include explicit reference to TAN 15 (flood hazard), TAN 8 (strategic search areas, small and medium scale developments etc.) and the requirement to minimise and mitigate for emissions. In addition, we would suggest inclusion of implications/objectives for sealed (non-permeable surfaces), Sustainable Drainage (SUDs), water resources and management of use of water etc. We recommend you refer to the CCW/EAW et al., guidance on climate change and SEA (SEA and Climate Change – Guide for Practitioners May 04).

3.27 - 3.36: These sections contain a great deal of information but no investigation/explanation as to the reasons for so many water/ground water bodies being at risk. The report needs to clarify why are these water bodies 'at risk'? What is the hazard and what is the risk? If its development (either domestic or economic), then the plan's objectives should reflect the need to actively pursue improvement in the water resource. If it is old industrial activity etc., then the plan should include objectives relating to remediation of contaminated land etc. These sections should also make reference to SUDs and the need to improve/negate any perceived risks relating to climate change.

3.37 Should consider information such as the leakage rates for the area. See also comments above

3.39-3.40: This section should also make reference to SUDs and the need to control/reduce non-permeable surfaces. Discharge issues are well covered but there is a need to cover any issues relating to water supply/management issues.

3.41 Refers to EA flood maps, should refer to TAN 15 flood maps and the need for assessment under TAN 15. Need to consider appropriate

(3.58/9) Action: 3.58 amended

(3.60) This is a matter of environmental management rather than a matter for land use planning and the LDP.

(3.61) Would not seem an appropriate place for this reference.

(3.77) 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.

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development only in different flood hazard zones i.e. non essential. (See 3.44)

3.45 This section considers air quality only in the context of polluting development. There needs to be greater emphasis on transport, particularly nitrous oxide and ozone, and other pollutants.

3.47: The statement that ' the location of the M4 has a positive effect on the new development attracted to the County Borough' needs further clarification and explanation. Is this transport section part of the Bridgend baseline or does it represent an addition to the consideration of SEA topics? If not then consider including it within the other sections that directly relate to the stated SEA topics in Annex 1(f) of the SEA Directive.

3.51: This should include reference to the need to avoid urbanisation of rural roads.

3.52: This should include reference to common land/foreshore within historic/cultural landscapes.

3.55: Cross reference to sections on natural heritage and nature conservation sites. Include reference to, and further details on common land resource

3.57: See CCW Greenspace Guidelines 'Providing Accessible Natural Greenspace in Towns and Cities: A Practical Guide to Assessing the Resource and Implementing Local Standards for Provision in Wales' (available from CCW contact p.frost@ccw.gov.uk).

3.58: Must cross ref to Transport, Air Quality and Climate Change sections.

3.59: Must cross ref to Transport, Air Quality and Climate Change sections.

3.60: Reference should be made to the Welsh Assembly's interim Marine Aggregates Dredging Policy.

3.61: This section should include reference to the need for 'appropriate assessment' in accordance with the Conservation (Natural Habitats & c)(Amended) (England and Wales) Regs 2006 and 42/2004/EC in relation to both Kenfig SAC and the Severn Estuary SPA, Ramsar and pSAC.

3.66: Must cross ref to Transport/Air Quality sections. Need to place more emphasis on "waste management" rather than waste recycling/disposal.

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3.77: The quantity of new housing is well covered but there is no mention of brown-field sites or whether utilities and service provision is adequate to support continued growth. There is a need to consider growth against availability of services and in respect of housing provision/demand in adjacent areas. What would be useful is an indication of travel to work figures. Are the people living in Bridgend working within the Plan area or is there an element of commuting to/from? (See section 3.85). If, as section 3.85 suggests, Bridgend has a major role to play as a dormitory county, then need to take very close look at transport modes and integration with housing/transport policies of, for example, Cardiff. The potential ecological value of Brownfield sites should also be considered.

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Q3

4.6-4.10: Would suggest that other relevant plans/programmes and policies are listed in an Appendix in a format that also indicates relevant elements of those plans/policies and programmes to the Bridgend LDP. As set out, this section does not explain in sufficient detail as to why certain international plans, projects and policies have been selected or are of relevance to the Bridgend LDP.

CCW would suggest the following additions:

- Ramsar Convention 1971
- Bonn Convention on the Conservation of Migratory Species 1979
- Bern Convention on the Conservation of European Wildlife and Natural Habitats 1979
- The Convention on Biological Diversity 1992Kyoto 1992
- The UN Millenium Declaration and Millenium Development Goals 2002
- World Summit on Sustainable Development 2002
- EU Directive on the Conservation of Wild Birds 79/409/EEC
- EU Directive on Ambient Air Quality and Management 1996/62/EC
- EU Biodiversity Strategy 1998
- EU Spatial Development Perspective EU 1999
- EU Directive 2002/49/EC relating to the Assessment and Management of Environmental Noise.
- The European Landscape Convention
- Environment 2010: Our Future, Our Choice-EU Sixth Environmental Action Plan 2002
- Agenda 21
- European Climate Change Programme
- The EU Nitrates Directive
- The Aarhus Convention and EU Directive on Public Participation
- EU Rural Development Policy
- Directive on Energy Performance of Buildings
- Renewable Energy Coalition
- Environmental Liability Directive (which will come into effect during this Plan's preparation)

4.11:CCW would suggest that the following additional UK/national ppp's should be considered as part of this assessment;

- Climate Change- the UK Programme 2001
- Our Energy Future- creating a low carbon economy 2003- UK white paper on energy
- The Future of Transport 2004- UK white paper on transport
- Countryside and Rights of Way Act
- Communities First Guidance 2001

4.15:CCW would suggest that the following Wales level ppp's should also be considered as part of this assessment;

- A Winning Wales- the National Economic Strategy of the Welsh

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(4.6-4.10) Some selective policies will be included.

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.

Covered in national and UK policy (including TANs)

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.

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Assembly Government

- The Transport Framework for Wales/Wales Transport Plan
- Farming for the Future- A New Direction for Farming in Wales
- Sports Tourism in Wales- A Framework for Action
- Cultural Tourism Strategy for Wales
- Wales- a Better Countryside Council For Wales Well Being in Wales
- Water Resources for the Future: Strategy for England and Wales
- Environment Strategy for Wales
- Wise about Waste: The National Waste Strategy for Wales
- South East Wales Regional Waste Plan and other relevant Regional Waste Plans
- Walking and Cycling Strategy for Wales
- Starting to live differently- The Sustainable Development Scheme
- South East Wales Development Strategy
- Building a Future for Wales- A Sustainable Housing Strategy
- Relevant UDP's, LDPs (in development) and Community strategies for all adjacent local Authorities
- Local Transport Plans
- LBAPs

Q4

5.1: CCW is concerned at the use of reworked sustainability objectives within the context of the SEA Directive and SEA Regulations. As outlined in several previous comments, the combined SA/SEA MUST conform to the Conservation (Natural Habitats & c)(Amended) (England and Wales) Regs 2006 and 42/2004/EC and care must be taken not to 'water down' SEA objectives and requirements. Failure of this SA/SEA to conform fully with the SEA Regulations will compromise this LDPs soundness and possibly prevent its 'adoption'.

5.2-5.9: See comments on 5.1. In preparing this scoping document, it would have been preferred if Bridgend had followed guidance issued by the Department for Communities and Local Government (previously ODPM) in respect of SEA practise and procedure. As stated in this document, it is evident that the emphasis has been placed on sustainability appraisal without due regard for the requirements of the SEA Directive and Regulations.

Table 5.1: We would ideally wish to see some indicative or specific targets and indicators in addition to the objectives and supporting objectives.

The report would also be generally enhanced by the effective use of maps and data tables.

(5.1) The primary concern of the framework is to comply with the SEA and other legal regulations. The framework has been 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.

(5.2 - 5.9) 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.

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Q5

Appropriate Assessment: (Conservation (Natural Habitats & c) Regulations 1994.
In October 2005, the European Court of Justice ruled that the UK has failed fully to implement the Habitats Directive (92/43/EEC). In order to comply with the ruling, an 'appropriate assessment' (as outlined in Article 6(3) and (4) of the Habitats Directive) must be carried out on land-use plans (including development plans) where it is considered that they are likely to have a significant effect on a Natura 2000 site.

The Local Development Plan area includes three Natura 2000 (N2K) sites and lies in proximity to a number of others. We welcome, therefore, Bridgend's acknowledgement of the possible implications of the forthcoming Regulations 'Conservation (Natural Habitats & c)(Amended) (England and Wales) Regs 2006. However, we disagree with the assertion that as these sites are "well away from existing built up areas" (paras. 2.12) or unlikely to be allocated for development (3.15 & 3.20) that there will be no significant effect and any further assessment is unnecessary. Bridgend are required under Reg 48 to undertake tests of significance of all relevant aspects of the plan in relation to their European sites, (and any other N2K sites which may be affected but are outwith the plan area). These 'tests of significance' need to consider direct and indirect effects and 'in-combination' effects with other plans and programmes. You need to consult CCW over any such test of significance.

It would not be appropriate (or useful) for Bridgend to pursue an LDP/SA/SEA without considering the requirements for 'appropriate assessment' (and the precautionary principle) at a very early stage.

The process should be clearly identified as a separate section within the SEA/SA scoping document and referenced from within the baseline characterisations. We recommend that you contact Kerry Rogers or Alison Brown (CCW) and the Welsh Assembly Government to discuss the context and methodology for any 'appropriate assessment' required at the earliest possible opportunity, and prior to the completion of the SEA. With this in mind, it is important that allowance is made for this process within the delivery agreement/SEA timetable. In that context, I attach the CCW guidance document: The Appropriate Assessment of Plans in Wales under the Provision of Part IV of the Conservation (Natural Habitats &C) Regulations 1994, David Tyldesley and Associates, Report to Countryside Council for Wales, March 2006., The final version of this guidance will be available from the Welsh Assembly Government in the near future.

Format of the report

The format of the report generally follows the Sustainability Appraisal headings. While this in itself is not inappropriate it can lead to

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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.

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.

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.

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.

Specific comments

(1.2) Action: Wording changed to add clarity, although this differs in some respects from that proposed by CCW.

(1.3) Action: Wording changed as proposed by CCW.

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difficulties in interpretation and assessment of the SEA objectives particularly the assessment of the “interconnectivity” between topics, which is a requirement of the SEA process (Annex 1(f)). In order to comply with the requirements of the SEA Directive, the SEA must be able to identify significant environmental effects. The draft sustainability framework relates more to sustainability appraisal techniques and may not be sufficiently robust in terms of SEA. The assessment of significant effects within SEA should be sufficiently robust and defensible to withstand challenge at the environmental report stage. As well as positive and negative, the likely environmental effects the SEA process needs to consider include; secondary, cumulative, synergistic, short/medium/long term, permanent and temporary effects.

Alternatives.

Although the scoping report refers to the to the consideration and assessment of alternatives as required by Article 5 of the SEA Directive there is some confusion over how this will be carried out. We would be happy to discuss the application of this key element of the SEA directive with you and look forward to seeing your alternatives to achieve the Plan’s objectives as part of the future SEA development process.

Links to the Community Strategy

The SA/SEA and Bridgend’s Community Strategy need to be complementary. The key relationship between the Community Strategy and LDP is that the latter should give the spatial expression to the elements of LDP that relate to the use and development of land. The priorities of the Community Strategy should be incorporated in to the SA/SEA scoping, particularly the linking of objectives an indicators into the baseline characterisation. The differences will need to be addressed through the full review of Community Strategies following the next Local Government Election.

1 Introduction

1.2 Re: the statement that, “the main aim and output of SEA is to ensure that the emerging plan is, as far as possible, environmentally friendly’. 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.

1.3 Change ‘protocol’ to ‘guidance’. It should be further noted that, notwithstanding the guidance encouraging SA/SEA to be combined in process, the combined SEA/SA MUST conform with the Conservation

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(1.5/1.7) 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 harm to the natural environment, particularly internationally designated nature conservation sites, this will be identified as being particularly significant.

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.

Action: see comment to 1.5/1.7

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(Natural Habitats & c)(Amended) (England and Wales) Regs 2006 and 42/2004/EC.

1.5 CCW understands that the reference to 'sustainability objectives' refers in this context to SEA/SA objectives however the combined SEA/SA MUST conform to the Conservation (Natural Habitats & c)(Amended) (England and Wales) Regs 2006 and 42/2004/EC and care must be taken not to 'water down' SEA objectives and requirements.

1.7 CCW understands that the reference to 'sustainability issues' refers in this context to SEA/SA issues however, the combined SEA/SA should conform, in terms of the environmental components it addresses, to the Conservation (Natural Habitats & c)(Amended) (England and Wales) Regs 2006 and 42/2004/EC

1.8 See comments on section 2.12.

1.10 Re use of the term 'sustainability'. See comments on 1.5 and 1.7 above.

Appropriate Assessment: (Conservation (Natural Habitats & c) Regulations 1994.

In October 2005, the European Court of Justice ruled that the UK has failed fully to implement the Habitats Directive (92/43/EEC). In order to comply with the ruling, an 'appropriate assessment' (as outlined in Article 6(3) and (4) of the Habitats Directive) must be carried out on land-use plans (including development plans) where it is considered that they are likely to have a significant effect on a Natura 2000 site.

The Local Development Plan area includes three Natura 2000 (N2K) sites and lies in proximity to a number of others. We welcome, therefore, Bridgend's acknowledgement of the possible implications of the forthcoming Regulations 'Conservation (Natural Habitats & c)(Amended) (England and Wales) Regs 2006. However, we disagree with the assertion that as these sites are "well away from existing built up areas" (paras. 2.12) or unlikely to be allocated for development (3.15 & 3.20) that there will be no significant effect and any further assessment is unnecessary. Bridgend are required under Reg 48 to undertake tests of significance of all relevant aspects of the plan in relation to their European sites, (and any other N2K sites which may be affected but are outwith the plan area). These 'tests of significance' need to consider direct and indirect effects and 'in-combination' effects with other plans and programmes. You need to consult CCW over any such test of significance.

It would not be appropriate (or useful) for Bridgend to pursue an

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LDP/SA/SEA without considering the requirements for 'appropriate assessment' (and the precautionary principle) at a very early stage.

The process should be clearly identified as a separate section within the SEA/SA scoping document and referenced from within the baseline characterisations. We recommend that you contact Kerry Rogers or Alison Brown (CCW) and the Welsh Assembly Government to discuss the context and methodology for any 'appropriate assessment' required at the earliest possible opportunity, and prior to the completion of the SEA. With this in mind, it is important that allowance is made for this process within the delivery agreement/SEA timetable. In that context, I attach the CCW guidance document: The Appropriate Assessment of Plans in Wales under the Provision of Part IV of the Conservation (Natural Habitats &C) Regulations 1994, David Tyldesley and Associates, Report to Countryside Council for Wales, March 2006., The final version of this guidance will be available from the Welsh Assembly Government in the near future.

Format of the report

The format of the report generally follows the Sustainability Appraisal headings. While this in itself is not inappropriate it can lead to difficulties in interpretation and assessment of the SEA objectives particularly the assessment of the "interconnectivity" between topics, which is a requirement of the SEA process (Annex 1(f)). In order to comply with the requirements of the SEA Directive, the SEA must be able to identify significant environmental effects. The draft sustainability framework relates more to sustainability appraisal techniques and may not be sufficiently robust in terms of SEA. The assessment of significant effects within SEA should be sufficiently robust and defensible to withstand challenge at the environmental report stage. As well as positive and negative, the likely environmental effects the SEA process needs to consider include; secondary, cumulative, synergistic, short/medium/long term, permanent and temporary effects.

Alternatives.

Although the scoping report refers to the to the consideration and assessment of alternatives as required by Article 5 of the SEA Directive there is some confusion over how this will be carried out. We would be happy to discuss the application of this key element of the SEA directive with you and look forward to seeing your alternatives to achieve the Plan's objectives as part of the future SEA development process.

Links to the Community Strategy

The SA/SEA and Bridgend's Community Strategy need to be complementary. The key relationship between the Community Strategy and LDP is that the latter should give the spatial expression to the elements of LDP that relate to the use and development of land. The priorities of the Community Strategy should be incorporated in to the

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Bridgend Local Development Plan

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SA/SEA scoping, particularly the linking of objectives and indicators into the baseline characterisation. The differences will need to be addressed through the full review of Community Strategies following the next Local Government Election.

Vale of Glamorgan Council

Mr D R

Thomas

57 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes	The approach is clearly set out using existing guidance and good practice	No action required.	
Q2	Yes	The data could be more easy to read with the help of some graphs, visual aids, maps etc.	Action: Further charts and maps will be considered, where of most use.	
Q3	Yes	It could be useful to set down the implications of the plans and strategies identified like the earlier baseline information section.	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.	
Q4	Yes			
Q5	Yes	<p>The references to SEWTA at 3.48 are not strictly correct and I suggest you speak to your colleague Richard Metford or look at the website www.sewta.gov.uk to get up to date information on the composition and remit of SEWTA.</p> <p>Paragraph 4.36 is misleading - it is not correct to call the Regional Transport Plan (RTP) a "new Local (Regional) Transport Plan".</p>	Action: This information has been altered in light of these useful comments.	

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Neath Port Talbot County Borough Council

Mr G A I

Jenkins

59 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes	Assessment of the effects of the Bridgend LDP on sustainability should include possible effects and consequences beyond the administrative boundaries of Bridgend County Borough Council.	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.	
Q2	Yes			
Q3	No	Should the list include plans / strategies of adjoining Authorities, that may impact upon Bridgend (e.g. NPT UDP etc.)?	Action: included for some neighbouring authorities' plans.	
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

Environment Agency Wales

REPRESENTATIONS by Representor

Mr Phil

Coombe

61 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes	<p>Paragraph 3.18 refers to the threats to the wildlife resource possibly from increased water abstraction. Mineral works, which include dewatering may also have the potential to impact upon biodiversity within the Borough and this aspect should be reflected within the text.</p> <p>Paragraph 3.41 refers to the Environment Agency's flood maps. This statement could be misleading since planning applications should be determined relative to the development advice maps (dams), issued by the Assembly Government in support of TAN 15. In consideration of the dams, the text under para. 3.44 - referring to "the land area at risk is limited to a few metres either side of rivers" - could then also change. We would suggest, for clarity, that reference to such distance be omitted.</p>	<p>Action: text amended.</p> <p>Action: text amended to refer to TAN 15 Flood Risk maps.</p>	

Bridgend Local Development Plan

The Glamorgan Gwent Archaeological Trust Ltd

63 A 2

REPRESENTATIONS by Representor

Mr Neil

Maylan

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No	If we can be of any assistance in the production of the LDP please contact us.	Noted	

Bridgend Local Development Plan

REPRESENTATIONS by Representor

CADW

Ms Beverley

Hunt

65 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1		The methodology of a combined SA and SEA is sensible although it seems unfortunate, for the sake of clarity, that the document is titled a Sustainability Appraisal as this gives the appearance of losing sight of the SEA component. It is not an approach I have seen elsewhere. However, the approach, although very much in outline at this stage, is appropriate and would seem to be in line with best practice.	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.	
Q2		<p>Although covered in detail in the Historic Environment section, it may be worthwhile to make reference to historic landscapes in the section on Landscape Character. In Section 5 an objective for the protection of historic landscapes is included in this section.</p> <p>The section on the Historic Environment is unusually thorough and accurate, and does well to identify the key heritage features of the county and set out the implications of the plan.</p> <p>One minor point is that the number of listed buildings stated by grade does not add up to the overall total stated. Cadw's records show 361 listings of which 8 are Grade 1, 37 Grade II* and 316 Grade II.</p>	<p>Action: reference made as suggested by CADW</p> <p>Action: updated to reflect the latest data received by the LPA from CADW.</p>	
Q3		Cadw is not itself responsible for any relevant plans or programmes and those of key interest to us are listed. However, in the SEA context, the synergy of the LDP with the objectives of the Welsh Assembly Government's Environment Strategy is also relevant and should be assessed.	Action: WAG's Environment Strategy has been reviewed and alterations have been made to the document.	
Q4		<p>In Table 5.1, introduction of the phrase 'Built Environment' is slightly unfortunate, as sections have previously used the term Cultural or Historic Environment. Although made quite clear by what follows a more inclusive title would be useful.</p> <p>The main and supporting objectives are appropriate although there is some duplication between the first two supporting objectives.</p> <p>Although perhaps implicit through the range of supporting objectives, there should perhaps be a specific reference to structures of architectural importance.</p>	<p>Action: text amended to reflect these comments.</p> <p>Action: a reference to architectural quality has been added</p>	

Bridgend Local Development Plan

Q5

The draft report is very much a scoping report, without the level of detail and prior assessment sometimes seen at this stage. However, it is entirely fit for purpose and indicates that the approach being adopted is an effective and well-considered one.

REPRESENTATIONS by Representor



Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Local Health Board

Mrs Zoe

Wallace

66 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q5	Yes	<p>a. Health Social Care and Well-being Strategy (HSCWB) Technical Document Nov 03 - summary of the needs assessment information b. HSCWB Assessment of need summary document Nov 03</p> <p>b. These docs may provide further info re human health section of SA. These documents are currently being reviewed, lead by Dr Eddie Coyle, Director of Public Health at the LHB, supported by Jan Twedily, HSCWB Coordinator located in Housing and Community Well-being in the Council Civic Offices.</p> <p>c. HSCWB Draft Strategy Community based focused groups consultation report - Stuart Jones, BCBC's Older Persons Strategy Coordinator, also located in Housing and Community Well-being in the Council Civic Offices produced this report when he was working as the Vol Sec HSCWB facilitator in BAVO. Stuart coordinated a series of public consultation events across the county borough (80+ I think from memory) to consultation on the draft HSCWB and Community Strategy. I'm sure there is info in the report that might help with the SA.</p> <p>d. LHB Primary Care Estates Strategy - to be referenced as a key document in section 4 of the SA document and to be considered in the LDP, with inclusion as a key document in Appendix 5.</p> <p>e. LHB GP practice QoF data - information to follow Bridgend v's Wales position</p> <p>Additional information as discussed:</p> <p>1. BAVO Newsletter - contact is Pat Lindsay, Information Officer, BAVO, 01656 647255, email: patlindsay@bavo.org.uk <mailto:patlindsay@bavo.org.uk> . Next publication dates are:</p> <p>4th September deadline 25th September publication 3rd November " 27th November "</p>	<p>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.</p> <p>•No action required as comments are specific to the LDP in general rather than the SA/SEA.</p>	

Bridgend Local Development Plan

2. LDP Appendix 4 'General Consultation bodies' - should include Bridgend Community Health Council in the list and move Bro Morgannwg NHS Trust from the 'other consultees' list to the 'general consultation bodies' list.

As discussed, I would seek advice from Tejay de Krester or Heidi Bennett at BAVO with regard to the inclusion of specific vol orgs in the 'general consultation bodies list as there is potential to offend orgs if you leave them off the list! For example - Portcawl boys and girls club is listed but the other boys and girls clubs that operate across the county borough are not, for example, Bettws. BAVO have over 500 vol orgs registered with them.

3. other key strategies that have been overlooked include the Bridgend Community Safety Strategy 2005-08 (contact John Davies, CSP coordinator) and the Children and Young Peoples Framework Partnership Plan (Contact Les Jones).

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Bridgend Local Development Plan

REPRESENTATIONS by Representor

Welsh Water / Dwr Cymru

Mr Rhidian

Clement

72 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Councillor M

Quick

112 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Councillor A E

Davies

119 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes	Need to look at neighbouring authorities, especially re: transport etc.	Action: appropriate additional material has been added on the plans and strategies of neighbouring authorities	
Q2	Yes	Tourism: Add it in everywhere! Sense of place identity.	This issue is addressed in the Tourism, Heritage and economy sections, to a level relevant to a LDP SA.	
Q3	Yes	Objective 1 Programme Document should be included - much wider remit than access to funds (though that is important) Gives a steer to development, and addresses all sustainability issues. This response is based on the 2000 - 2006 SPD - I havent seen the later one - it its there yet?	Objective 1 is summarised in 3.80, it will be a matter that the LDP preparation team must assess.	
Q4	Yes	"Sense of Place" to be specifically added at this point also.	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.	
Q5	No			

Bridgend Local Development Plan

British Geological Survey

REPRESENTATIONS by Representor

Dr Adrian

Humpage

157 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Don't know			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

Design Commission for Wales

REPRESENTATIONS by Representor

Cindy

Harris

166 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4		<p>Ref. 5.2 - in the future resource use needs to be reduced to a sustainable rate i.e. less than it is now.</p> <p>Table 5.1 - Economic growth and employment: Develop local supply chains for construction projects.</p>	<p>The sustainability appraisal contains the consideration of reducing resource use as one of its key themes, in terms of water, energy and materials</p> <p>Consideration of local supply chains has been added into the wealth creation sub-objectives in figure 5.1.</p>	
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bro Morgannwg NHS Trust

170 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	No	Para 2.10: The forth sentence is confusing. Is it meant to indicate a division of responsibilities between the work to be undertaken by Baker Associates and the LPA, or does it imply that only key proposals and allocations will be subject to SA? Amendment or clarification is required as it is ambiguous at present.	Action: The text has been amended. It is hoped it is now clearer.	
Q2	No	Para 3.5 identifies "Human Health" as a requirement of the SEA Directive. Para 3.8 et seq describes how the baseline characterisation will be compiled. There appears to be no description of how "human health" will be treated.	Action: An additional section on health has been added to the baseline.	
Q3	Yes			
Q4	No	Para 5.2 identifies one of the sustainability objectives as: "that access to resources in the future should be at least as it is now." This seems rather non-aspirational and not to accord with the UK government objective of "Social Progress which recognises the need of everyone." Table 5.1: Under the heading of "Health, Safety and Security", the supporting objective should refer not only to improving access to health services, but also to the provision of improved facilities and services. This will have land use implications that will need to be properly reflected in the LDP. We will make appropriate suggestions at a later stage in the LDP process.	Action: Text altered to make this clearer, that this relates to natural resources, and the second bullet makes clear access now should be equitable. Action: figure 5.1 is amended to ensure services are good quality, which implies improved where necessary.	
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr V S

Hughes

179 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr P D

Kinsella

183 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr Gareth

Ames

184 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

Porthcawl Civic Trust Society

REPRESENTATIONS by Representor

Mr Mike

Mansley

192 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr & Mrs R J

Hayes

193 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

British Horse Society

Mr G.J

Wheeler

212 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	No	The section makes reference to both transport and open space but there is no mention of Public Rights of Way or Open Access Land that are essential aspects of a sustainable environment. And necessary for the health and recreation or the "Population".	Action: This omission has been accepted and baseline data and reference to urban green space and the ROWIP are now included.	
Q3	No	The Bridgend "Rights of Way Improvement Plan" should be included.	See above	
Q4	Yes			
Q5	Yes			

Bridgend Local Development Plan

Porthcawl 4M Group

REPRESENTATIONS by Representor

Mrs P R

Chapman

277 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

South Wales Sea Fisheries

REPRESENTATIONS by Representor

299 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1		<p>A very general and superficial comment on the above if we may arising from a brief look at the document: -</p> <p>The document is naturally very "inward" looking i.e. looks to the "dry" part of the County.</p> <p>LA's have jurisdiction to the Mean Low Water Mark. Many activities take place along the coast and indeed offshore which then come to land on "their" patch - far too many for me to list. These have soci-economic impact and need managing. The document makes little mention other than in a bathing beach and coastal defence function.</p> <p>How about: -</p> <p>Commercial fishing and aquaculture, watersports, recreation e.g. sea angling and bait digging, tourism impact, biodiversity in intertidal SSSIs, landing of marine aggregates and wind farm cables etc etc.</p> <p>All of these activities need managing in what has become to be known as "Integrated coastal zone management" upon which Government has previously issued several consultation papers and the EU has issued guidance. LAs are expected to be a lead player. Indeed in its recent response to the Marine Bill consultation English LGA made a bid to extend LA jurisdiction from MLWM to +12n miles!</p> <p>Perhaps you could copy me in on WLGA response?</p>	<p>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)</p>	

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Housing Partnership

Mr Peter

Green

583 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes	<p>Generally agree.</p> <p>Affordable housing for people and developing households living in the County Borough and wishing to do so in the future is a concern, particularly the anecdotal information that in-migration for cheaper housing by, households whose main income is derived from employment further east in Wales and England is accounting for much of the take-up of new / expansion housing developments in e.g. Broadlands and Parc Derwen.</p> <p>Is this undermining local sustainability?</p>	<p>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.</p>	
Q3	Yes			
Q4	Yes	<p>But, for example : in-migration, but travel to work outside of the County Borough.</p> <p>What is the regional dimension of these objectives? e.g. impact upon air pollution.</p>	See above	
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Town Centre Forum

Mr Jonathan

Hughes

584 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	No	<p>The baseline categories are comprehensive.</p> <p>2. Additional categories that might be considered for inclusion include: health statistics, housing statistics e.g needs, conditions, crime and disorder statistics, health impact assessments.</p>	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.	
Q3	Yes			
Q4	Yes			
Q5	Yes	In terms of plans and strategies to inform the appraisal, the following documents are suggested for inclusion: Health - Primary Care Estates Strategy, Economic Development - WAVE (National Economic Development Strategy), Community Safety - Crime and Disorder Strategy, Young People - Children and Young Persons Strategy.	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.	

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Communities First Bridgend

612 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Don't know			
Q2	No	Where employment figures etc are used, there are huge variation in these between wards/output areas and therefore these need to be taken into consideration. Where some areas within BCBC are average to Wales, some are much better or much worse than the average. The extremes of these figures on a ward or output area level need to be included in this baseline information	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.	
Q3	No	Other local plans and strategies eg. Communities First Action Plans should also be taken into account.	See above	
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr Alec

McKenzie

616 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

H

Price

618 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Island Farm Action Group (IFAG)

Mrs Anne

Morgan

624 A 2

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
		<p>Broadly speaking we agree with the approach on all sections and feel the issues of sustainability and the environmental consequences have been well covered. Would however make the following comments:</p> <ol style="list-style-type: none">1. Concerned that the sustainability assessment may not cover areas where there are protected species but where they are not listed as "SI's" etc. In particular the protected species of Dormice and Bat at Island Farm.2. EC Habitat Directive and UK Habitat Regulations cover such species. Will there therefore be assessment taking into account this directive? If so content with the Draft as presented in the report.3. The comments on landscape quality (3.11) and Lowland Grassland (end of report) are particularly endorsed.4. Repeat the comment made at the time of the last UDP consultation. We feel that any mineral working for sand and gravel in the Borough (sites as identified in the UDP) should be subject to sequential testing when there is a planning application, and that future sustainability appraisal and LDP reports should list the sequential testing requirements.5. No mention is made of land protection of Green Wedges. This I take it will form part of a later stage of the consultation process of the LDP. Please note that at that stage we would wish to make representation on the reinstatement of the Green Wedge at Island Farm which was deleted at the Deposit stage of the UDP and recommend for reinstatement by the UDP Inspector should the Island Farm Development not go ahead.	<ol style="list-style-type: none">(1) The SA makes reference to the LBAP and non statutory areas of importance in 3.16, and the general protection of species.(2) Appropriate assessment will be part of the SA process, and screening for need and assessment will take place as necessary.(3) No actions required.(4) 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.(5) 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 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.	