



MERTHYR TYDFIL COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN 2006 - 2021

ADOPTED PLAN

**SUSTAINABILITY APPRAISAL (SA)
STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)**

Final Sustainability Appraisal Report

May 2011

Prepared by:

**MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
LOCAL DEVELOPMENT PLAN**

ADOPTED PLAN

**SUSTAINABILITY APPRAISAL (SA) incorporating
STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)**

Final Sustainability Appraisal Report

for and on behalf of Enfusion Ltd

<i>date:</i>	<i>May 2011</i>	
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**MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
ADOPTED PLAN
SUSTAINABILITY APPRAISAL REPORT**

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ABBREVIATIONS

AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
CIS	Community Involvement Scheme
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
BERR	Department for Business Enterprise & Regulatory Reform
EU	European Union
GP	General Practitioner
HLT	High Level Targets
HRA	Habitats Regulations Assessment
IT	Information Technology
LANDMAP	Landscape Assessment and Decision Making Process
LDP	Local Development Plan
LNR	Local Nature Reserve
LPA	Local Planning Authority
MTAN	Minerals Technical Advice Note
MTCBC	Merthyr Tydfil County Borough Council
NPFA	National Playing Fields Association
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics
PPs	Plans and Programmes
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SSA	Strategic Sustainability Appraisal
SINC	Sites of Importance for Nature Conservation
SPG	Supplementary Planning Guidance
SSSI	Sites of Special Scientific Interest
TAN	Technical Advice Note
UDP	Unitary Development Plan
WAG	The Welsh Assembly Government
WHQS	Welsh Housing Quality Standard

NON-TECHNICAL SUMMARY

Summary and Outcomes

This Sustainability Appraisal Report

- 1 This is the **Non-technical Summary** (NTS) of the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), for the **Merthyr Tydfil County Borough Adopted Plan** as required by planning legislation and Government guidance. This summarises the final SA Report that records the whole SA process from 2005 to 2011. In accordance with SEA/SA requirements, an **Adoption Statement** has also been published alongside the **Adopted Local Development Plan** (LDP) in May 2011.

Sustainability Appraisal/ Strategic Environmental Assessment

- 2 SA assists in promoting more sustainable development through an ongoing dialogue and assessment during the preparation of development planning documents. SEA considers the potential impacts of planning proposals on the environment and is a requirement of European legislation. In Wales, SEA is incorporated into the SA process and consideration of socio-economic issues is dealt with to the same level of detail as environmental. The Council commissioned consultants Enfusion Ltd to assist with preparation and then progress the SA work in November 2005.

Sustainability Issues, Problems and Opportunities

- 3 The Council carried out a sustainability scoping process between October and December 2005 to help ensure that the SA covered the key sustainability issues that are relevant to the development planning system in the Merthyr Tydfil area. Relevant plans and programmes were reviewed to develop a wider understanding of the issues and priorities for Merthyr Tydfil, together with a description of the current and predicted social, environmental and economic characteristics of the County Borough.
- 4 From these studies and public consultation, the key sustainability problems and issues were identified as; high levels of social deprivation and unemployment; poor health; an ageing and declining population; a lack of affordable housing; regeneration of the main town of Merthyr Tydfil; the need to integrate land use with transport; increased employment opportunities; crime and fear of crime; development pressures on historic and conservation areas; and the need to adapt to climate change.

Method for Appraising the Sustainability of the Local Development Plan and Consultation

- 5 A Sustainability Appraisal Framework was compiled and included objectives that aim to resolve the issues and problems identified. It was proposed to use these sustainability objectives to test the Local Development Plan as it was being prepared. A workshop facilitated by Enfusion Ltd was held on the 28th February 2006 at the Civic Centre, Merthyr Tydfil. The main purpose of the workshop was to discuss the draft version of the SA Framework and allow stakeholders to contribute to its content. The approach outlined above and the proposals for testing the development planning process was presented into a SA Scoping Report that was sent to a wide range of organisations during April to June 2006. Comments were invited and received from a number of these organisations; this consultation helped improve the Sustainability Appraisal Framework.

Appraising the Strategic Options

- 6 A Draft Strategic Options Report was published by MTCBC in June 2006. The purpose of the report was to advance the 3 Strategic Options for the emerging Merthyr Tydfil County Borough Council Local Development Plan (LDP) 2006-2021. The fundamental element of the Moderate and Enhanced Growth Strategies is to address the declining population base of the LDP area during the plan period. A Non-Intervention Strategy was also introduced to provide a comparator to illustrate what would happen if no meaningful framework was put in place to channel market forces and influence patterns of development.
- 7 An initial SA of the Strategic Options was carried out by Enfusion Ltd in June 2006 using professional judgement and available baseline information to appraise the strategic options against the SA objectives. The SA findings showed that the Enhanced Growth Strategy has the greatest potential to become the most socially and economically sustainable option. However there were potential significant adverse effects indicated for environmental factors.

Appraising the Preferred Strategy

- 8 The Preferred Strategy contained 20 draft strategic policies which were formulated in response to the baseline situation and were designed to help address environmental, economic and social issues/ trends. The Council approved the Preferred Strategy for public consultation in April 2007 and the document was subjected to six weeks of public consultation during May to June 2007.
- 9 A compatibility analysis and strategic Sustainability Appraisal of the Strategic Objectives for the Preferred Strategy was carried out in July 2006. The Preferred Strategy Objectives were found to be broadly compatible with the SA Framework objectives. SA on the Draft

Strategic Policies was carried out in October 2006 using the SA Framework. The SA concluded that generally, the set of strategic policies positively progresses the SA framework and the positive effects are likely to be permanent.

Appraising the Preferred Strategy Site Allocations

- 10 A three stage site assessment methodology was used to assess potential sites included in the Preferred Strategy that were over 0.3 ha. Viable and compatible sites screened in the initial stages 1 and 2 were then subject to stage 3 assessment using professional judgement by MTCBC and using the objectives and decision-aiding questions in the SA Framework. This approach was appraised independently by Enfusion Ltd and considered to be appropriate and meet with requirements for Sustainability Appraisal. The Preferred Strategy contained a major 200 hectare site; proposals for this site were subject to SA and significant adverse effects on the environment were identified. The site was removed from the Enhanced Growth Strategy.

Habitats Regulations Assessment

- 11 The purpose of HRA/AA is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. The scope of the HRA/AA is dependent on the location, size and significance of the proposed plan or project and the sensitivities and nature of the interest features of the European sites under consideration.
- 12 Habitats Regulations Assessment Screening of the Preferred Strategy was undertaken by Enfusion Ltd in summer 2008. The HRA Screening Report is being published alongside this SA Report and the Deposit Plan for consultation. The screening assessment showed that the LDP Preferred Strategy policies in implementation will not have a significant effect on the Natura 2000 sites considered in the assessment.

Appraising the Deposit Plan

- 13 Representations received during the consultation on the Preferred Strategy were considered for inclusion in the Deposit Plan, which is the first version of the LDP that contains specific land use allocations and detailed policies for assisting to realise the Preferred Strategy. The Deposit Plan includes a Vision, Primary Aim and Strategic Objectives for the County Borough. The Deposit Plan was developed between Summer 2007 and Summer 2008 and subject to SA by Enfusion Ltd during July-September 2008.
- 14 The SA of the Deposit Plan Policies has found that, for the most part, the policies are likely to have significant positive County Borough-wide

effects on sustainability. The appraisal has indicated that Deposit Policies provide strong progression of core SA objectives, in particular for housing, communities and the economy. Health is a significant issue in the County Borough and the SA recognises the positive synergistic impact on general health levels, which are perceived by the population as being poor, through the combined provision of improved education, health and leisure facilities and the protection/provision of open space.

- 15 There are also positive secondary and synergistic effects arising from the combination of policies which relate to the historic landscape, the wider landscape, green wedges, the Valley Regional Park and biodiversity. In combination these will assist in robust protection of the countryside, habitats and species and will also ensure that the characteristics on which the tourism economy is based are not undermined or destroyed.
- 16 A number of recommendations were made throughout the SA of the Deposit Plan Policies - primarily focusing on specific policy issues such as wording or the inclusion of specific criteria levels to avoid any doubt or ambiguity. For example, there is potential for Policy BW7: Sustainable Design and Place Making to make specific reference to a particular level of the Code for Sustainable Homes as this would remove any doubt as to the requirement of 'high' resource efficiency standards.

Appraising the Deposit Plan Site Allocations

- 17 During August - September 2008 the Council carried out a refined three stage assessment of the Deposit Plan Site Allocations, using detailed local knowledge to carry out meaningful site specific appraisals. Viable and compatible sites screened in the initial stages 1 and 2 were then subject to stage 3 assessment using professional judgement and using the objectives and decision-aiding questions in the refined SA Framework. Thus Plan making and SA processes were effectively integrated at this stage.
- 18 Overall the site allocations perform well against the refined SA Framework and will help to realise the Preferred Strategy. Sites assessed as positive benefit from good transport links and access to a range of facilities. The proximity of sites to areas of open space and recreation are also advantageous. The stage 3 site assessments also highlighted the need for appropriate mitigation measures to being carried out for particular sites in order to improve the sustainability of proposed developments.

Appraising the Submission Plan and LDP Examination Documents 2009-2010

- 19 As a result of comments and representations received during public consultation 30 October – 12 December 2008 on the Deposit Plan, the

document was amended and set out a spatial strategy for development that no longer includes a 200 ha site to the west of Rhydyrcar. Representations were made by Merthyr Village Ltd (MVL) and the Merthyr Initiative Group (MIG) with regard to the omission of this site from the Spatial Strategy in the Deposit Plan. In response to this consultation, further SA studies were carried out to take account of new information and circumstances since the original SA in 2007.

- 20 The SA findings were reported by Enfusion for the Council in May 2009 – SA (2) of Development Proposals by Merthyr Village Ltd. The SA concluded that the development of the 200ha site proposed by MVL would cause significant adverse environmental effects, together with issues for public safety associated with the stability of the site. The SA identified that mitigation of such adverse effects will be difficult and/or expensive such that there would be major significant adverse residual effects on landscape, cultural heritage and biodiversity. This further SA confirmed the earlier SA findings and the Adopted Plan does not include a 200 ha site to the west of Rhydyrcar.
- 21 Further changes and refinements were made as a result of the LDP Examination (2009-2010). None of the changes alter the thrust of the Council's overall strategy and the objectives of the plan remain as set out above. The main changes relate to revised housing and employment allocations, affordable housing, minerals safeguarding and operation, and the updating or clarification of various parts of the LDP document.
- 22 Proposed changes to the LDP were subject to screening for SA and most were not considered to be likely to have significant sustainability effects. Those few changes that were considered to be significant were appraised using the SA Framework and were found to either not significantly alter the sustainability or to improve the sustainability of the proposals.
- 23 The Inspector also requested additional information including a new comparative strategic sustainability appraisal (SSA) of the Enhanced Growth Strategy to compare the original SA that included a 200 ha site at Rhydyrcar West with a new option of the Enhanced Growth Strategy that excludes the 200 ha site. The Growth Strategy excluding the 200 ha site remained the more sustainable alternative development option. This was particularly due to the significant adverse effects on biodiversity likely from the proposals for the 200 ha site.

Monitoring

- 24 Local planning authorities are required to produce Annual Monitoring Reports including indicators and targets against which the progress of Local Development Plan can be measured. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a Monitoring Strategy that incorporates the needs of the Local Development Plan and the SA. It

is essential to select a meaningful number of indicators that are appropriate for the monitoring strategy. A comprehensive list of potential indicators and targets has been produced by the Council. The integrated Monitoring Strategy will be further refined as the LDP is implemented and the Council further develops its Annual Monitoring Reporting (AMR).

Statement on the Difference the SA/SEA process has made

- 25 The Sustainability Appraisal has been carried out on draft plan documents in an iterative and ongoing way. The findings have helped inform the preparation of the LDP by making suggestions for mitigating identified adverse effects and enhancing possibilities for enhancing positive effects through changes to the wording in policies. A separate Adoption Statement (May 2011) in accordance with the requirements of the European SEA Directive and the associated Welsh Regulations provides further details of how the SA/SEA process has helped integrate sustainability and environmental considerations into the preparation of the LDP.

1.0 BACKGROUND

Purpose of the Sustainability Appraisal and the SA Report

- 1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of a Local Development Plan (LDP). This requirement is set out in Section 39 (2) of the Planning and Compulsory Purchase Act, 2004. Local Development Plans must also be subject to Strategic Environmental Assessment¹² (SEA) and Government advises³ that an integrated approach is adopted so that the SA process incorporates the SEA requirements.
- 1.2 This is the final SA Report that documents the Sustainability Appraisal/ Strategic Environmental Assessment process for the Merthyr Tydfil County Borough Council (MTCBC) Adopted Local Development Plan. The Sustainability Appraisal Framework discussed in Section 3 of this SA Report indicates the relationship between the SA and the SEA; compliance with the SEA Regulations is signposted below in this section and detailed in Appendix 1.
- 1.3 This final SA Report is being published with Adoption Statement and the Adopted Local Development Plan in accordance with SEA Regulations and SA Guidance. It aims to provide a record of the SA/SEA work undertaken 2006-2011 in one accessible document. Details are available separately in individual appendices.

Sustainability Appraisal/ Strategic Environmental Assessment

- 1.4 SA assists in promoting more sustainable development through an ongoing dialogue and assessment during the preparation of development planning documents. SEA considers the potential impacts of planning proposals on the environment and is a requirement of European legislation. In Wales, SEA is incorporated into the SA process and consideration of socio-economic issues is dealt with to the same level of detail as environmental.
- 1.5 SA is objectives led using an SA Framework to provide the basis by which the sustainability effects of emerging Local Development Documents will be described, analysed and compared. The SA Framework includes a number of sustainability objectives, elaborated by 'decision-aiding questions'. The sustainability objectives seek to address and progress the main sustainability issues and opportunities identified as important in Merthyr Tydfil. The decision-aiding questions assist by clarifying the detail of the issues, improving objectivity,

¹ EU Directive 2001/42/EC

² Environmental Assessment of Plans and Programmes Regulations (Wales) 2004

³ ODPM, 2005 *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*

ensuring that the appraisal is relevant to land use planning, and making the SA Framework more locally specific.

The Local Development Plan

- 1.6 Section 62 of the Planning and Compulsory Purchase Act 2004 requires the Council to prepare an LDP setting out its objectives and priorities for the development and use of land, and policies to implement them. The Merthyr Tydfil County Borough LDP will span the period 2006-2021.
- 1.7 Preparation of the Merthyr Tydfil LDP commenced in September 2005 with the LDP Delivery Agreement, which set out the timetable for the production of the plan together with details of how the local stakeholders were to be engaged through the Community Involvement Scheme. The Delivery Agreement was agreed with the Welsh Assembly Government in February 2006 and subsequently published in accord with the Town & Country (Local Development Plans) (Wales) Regulations 2005. Following public consultation at the pre-deposit stage, a revised version of the Delivery Agreement was agreed with the Welsh Assembly Government and published in January 2008.

LDP: Draft Strategic Options Report 2006

- 1.8 The Draft Strategic Options Report was published by MTCBC in June 2006. The purpose of the report was to advance the three Strategic Options for the emerging Merthyr Tydfil County Borough Council Local Development Plan (LDP) 2006-2021. The LDP's Vision was reflected in the Moderate and Enhanced Growth Strategies. The fundamental element of the Moderate and Enhanced Growth Strategies is to address the declining population base of the LDP area during the plan period. A Non-Intervention Strategy was also introduced to provide a comparator to illustrate what would happen if no meaningful framework was put in place to channel market forces and influence patterns of development.

LDP: Preferred Strategy 2007

- 1.9 The Council approved the Preferred Strategy for public consultation in April 2007 and the document was subjected to six weeks of public consultation during May /June 2007 alongside the background paper on Population, Dwelling and Employment Land Forecasts and the Initial Sustainability Report. The Preferred Strategy contained 20 draft strategic policies which were formulated in response to the baseline situation and were designed to help address environmental, economic and social issues/ trends.

LDP: Deposit Plan 2008

- 1.10 Representations received during the consultation on the Preferred Strategy were considered for inclusion in the Deposit Plan, which is the

first version of the LDP that contains specific land use allocations and detailed policies for assisting to realise the Preferred Strategy. The Deposit Plan was subject to a 6-week period of public consultation in the same way as the Preferred Strategy. The Deposit Plan contained the Vision, Primary Aim and Strategic Objectives for the County Borough, and this was taken forward to the Adopted Plan as follows:

Vision:

Between 2006 and 2021, the Local Development Plan will ensure that the development and use of land in Merthyr Tydfil is undertaken in a sensitive manner following a holistic approach with the concept of sustainability as its core. In this way, the ambition of the Plan is to reflect the expectations of the community to:

- *facilitate sustained growth;*
- *promote social inclusion;*
- *safeguard the environment; and*
- *provide an excellent quality of life for all.*

Primary Aim:

To facilitate a reduction in current levels of out migration from the County Borough so that population levels stabilise by 2011 and a 10-year period of enhanced growth is achieved thereafter.

Strategic Objectives:

1. *To capitalise on Merthyr's strategic position, further developing its role as the main commercial, service and employment centre in the Heads of the Valleys area by focusing development within the main town of Merthyr Tydfil.*
2. *To focus appropriate levels of development within the County Borough's smaller valley communities to create affordable and attractive places to live with good access to jobs and services.*
3. *To promote regeneration through the use of suitable and appropriate brownfield land rather than greenfield sites.*
4. *To support the principle of sustainability via an energy efficient land use/ transport strategy*
5. *To manage natural resources wisely avoiding irreversible damage in order to maintain and enhance their value for future generations.*
6. *To provide a range of dwelling sizes and types, including affordable and special needs housing, which support the needs of the local community, attract new inhabitants to the area and create mixed and socially inclusive communities*
7. *To improve and diversify the economy, safeguarding existing jobs and creating a range of new job opportunities in a sustainable manner*
8. *To promote social inclusion and ensure equality of opportunity through reducing the need to travel and providing better access by sustainable means to employment opportunities, community facilities and services.*
9. *To promote health and wellbeing by providing accessible and varied opportunities for leisure and recreational activities.*

10. *To ensure good quality design of new development and the creation safer communities.*
11. *To ensure the continued protection and enhancement of the natural, cultural, built and historic environment.*
12. *To contribute towards reducing the impact of climate change through reduced carbon dioxide emissions in new developments.*

LDP: Submission and Examination 2009-2010

- 1.11 Various changes were made to the LDP as a result of comments received during public consultation (30 October – 12 December 2008) on the Deposit Plan. Further changes and refinements were made during the LDP Examination (2009-2010). Details are provided in two LDP Addendum Reports (2009) and two Post-Suspension Proposed Changes Reports (2010). None of the changes alter the thrust of the Council's overall strategy and the objectives of the Plan remain as set out above. The main changes relate to deletion of one large housing allocation with the addition of another, revised housing and employment allocations, updating and clarification of various parts of the LDP document.

Summary Compliance with the SEA Directive & Regulations

- 1.12 The SEA Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process, as for the SAs of the Merthyr Tydfil LDP), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. Consequently the requirements for reporting the SEA process are set out in Appendix 1, which highlights the section of the report that progresses each SEA requirement.

Habitats Regulations Assessment (HRA)

- 1.11 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 (N2K) sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) [which are classified under the Council Directive 79/409/EEC on the conservation of wild birds, the 'Birds Directive'].
- 1.12 The purpose of HRA/AA is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. The scope of the HRA/AA is

dependent on the location, size and significance of the proposed plan or project and the sensitivities and nature of the interest features of the European sites under consideration.

- 1.13 Habitats Regulations Assessment Screening of the Preferred Strategy was undertaken by Enfusion Ltd in summer 2008. The HRA Screening Report was published alongside the SA Report and the Deposit Plan for consultation.

SA Carried out to Date

- 1.14 Enfusion Ltd was commissioned in November 2005 by MTCBC to provide specialist support to the SA/SEA process. An SA scoping process was undertaken by MTCBC between October and December 2005, which led to an SA Scoping Report being published by the Council in April 2006. As a result of consultation responses received, the SA Scoping Report was revised by MTCBC in June 2006 and sent to all those who had participated in the consultation.
- 1.15 Enfusion Ltd undertook the SA of the Strategic Options in June 2006 to help inform the Preferred Strategy. The Preferred Strategy 2007 contained 20 draft strategic policies, which were subject to SA by Enfusion Ltd in October 2006. MTCBC carried out a three-stage site assessment of the Preferred Strategy site allocations and prepared the Initial SA Report, which was then published in April 2007. This document included the detailed appraisals of the Strategic Options and 20 draft strategic policies carried out by Enfusion Ltd.
- 1.16 The Deposit Plan was subject to SA by Enfusion Ltd in July-September 2008. MTCBC carried out a revised three-stage site assessment of the Deposit Plan site allocations during July-August 2008. The SA Report compiled by Enfusion Ltd was presented for public consultation alongside the Deposit Plan 30 October – 12 December 2008. Representations were made by Merthyr Village Ltd (MVL) and the Merthyr Initiative Group (MIG) with regard to the omission of the 200 ha site west of Rhydycar from the Spatial Strategy in the Deposit Plan. In response to this consultation, further SA studies were carried out to take account of new information and circumstances since the original SA in 2007, and to provide comparative sites appraisal. The findings of these SA studies were presented in SA (2) of Development Proposals by Merthyr Village Ltd (May 2009), and Comparative Strategic Sustainability Appraisal (February 2010).
- 1.17 As a result of the public consultation on the Deposit LDP, the Council recommended a number of Focused and then Further Focused Proposed Changes to the Plan; these were published as two Addenda to the LDP. Significant changes were subject to SA and reported alongside these Addenda in 2009 for public consultation. Further changes and refinements to the LDP arose from these consultations and the Examination, including the additional work undertaken during the Examination suspension period in 2010. Changes screened as

being significant for the purposes of SA/SEA were again subject to SA and reported in March, May, July and December 2010.

This Report

- 1.18 Section 2 of this Report outlines the various appraisal methods used and public consultation carried out during the SA process. Section 3 then goes on to describe the key sustainability issues for Merthyr Tydfil, which were derived from a review of plans and programmes and baseline information. The SA Framework which is based on the key sustainability issues is then presented and explained. Section 4 summarises the SA of the Preferred Strategy providing findings and recommendations. The SA of the Deposit Plan is then summarised in Section 5 identifying any cumulative effects or recommendations that were highlighted during the SA.

- 1.19 Section 6 of this SA Report sets out the SA of the changes made to the LDP during 2009 /2010 as a result of public consultation on the Deposit Plan and Examination of the submitted Plan. Section 7 reports the monitoring strategy. Appendix 1 explains how the requirements for the European SEA Directive and associated Welsh Regulations have been met in this SA Report. Appendices 2-15 provide the details of the appraisals. This Final SA Report is published in May 2011 alongside the Adopted Plan and the SEA Adoption Statement.

2.0 APPRAISAL METHODS

Introduction

- 2.1 The SA has been undertaken in accordance with the statutory requirements set out in formal guidance for the sustainability appraisal of local development documents which incorporates Strategic Environmental Assessment.⁴ Where there were any potential adverse effects predicted for sustainability or opportunities identified to improve the sustainability of the emerging LDP, recommendations were made. Professional judgement and available baseline information has informed the assessment of the LDP.

Scoping the Key Sustainability Issues

- 2.2 An SA scoping process was undertaken by MTCBC between October and December 2005 to help ensure that the SA covers the key sustainability issues that are relevant to spatial and development planning in Merthyr Tydfil. This included the development of an SA Framework of objectives (presented at the end of Section 3 of this SA Report) to comprise the basis for appraisal. A workshop facilitated by Enfusion Ltd was held on the 28 February 2006 at the Civic Centre, Merthyr Tydfil. The main purpose of the workshop was to discuss the draft version of the SA Framework and allow stakeholders to contribute to its content. An SA Scoping Report was prepared by MTCBC to summarise the findings of the Scoping process. This was published in April 2006 for consultation with stakeholders and was also available on the Council's website. Responses to this scoping consultation, and how they were taken into account, are reported in Appendix 2 of this SA Report accompanying the Deposit Plan. As a result of these comments the SA Scoping Report was revised by MTCBC in June 2006 and sent to all those who had participated in the consultation.

Appraising the Local Development Plan

Appraising the Local Development Plan Vision and Strategic Objectives

- 2.3 A compatibility analysis of the Preferred Strategy Objectives was carried out by Enfusion Ltd using the SA Framework of objectives for sustainability and planning in July 2006. The Local Development Plan Strategic Objectives have since been revised following Preferred Strategy consultation. Recommendations made by the Initial Sustainability Report (April 2007) were incorporated and are in Section 5 of this SA Report. In July 2008 a compatibility analysis of the Deposit Plan Vision and revised Strategic Objectives was carried out using the SA Framework of objectives.

⁴ Sustainability of Regional Spatial Strategies and Local Development Documents (ODPM, Nov 2005).

Appraising the Strategic Options 2006

- 2.4 The Draft Strategic Options Report was published by MTCBC in June 2006 and was subject to an initial SA process by Enfusion Ltd during this period. The Sustainability Threshold Assessment method (STA)⁵ was used to provide a strategic overview of the performance of the three Spatial Strategy Options (Enhanced, Moderate and Non-Intervention) against the SA objectives. Professional judgement and available baseline information informed the assessment of the emergent thinking for the issues and potential spatial options for Merthyr Tydfil. An outline of each of the LDP Spatial Strategy options is set out in the Draft Strategic Options Report published by MTCBC in June 2006. The detailed SA of the 3 Spatial Strategy Options is presented in Appendix 7 and summarised in Section 4.

Appraising the Preferred Strategy 2007

- 2.5 The Preferred Strategy 2007 contained 20 draft strategic policies which were formulated in response to the baseline situation and were designed to help address environmental, economic and social issues/trends. A Detailed SA (Appendix 5) which is summarised in Section 4, was carried out on the 20 draft strategic policies in by Enfusion Ltd in October 2006 using the SA Framework and professional judgement with the baseline information, where available. Where there were any potential adverse effects predicted for sustainability or opportunities identified to improve the sustainability of the Preferred Strategy, recommendations were made.

Appraising the Preferred Strategy Site Allocations 2007

- 2.6 A three stage site assessment methodology was used by MTCBC to assess potential sites over 0.3 ha. This is presented in Appendix 8 of the Preferred Strategy to the LDP submitted for examination in public. Viable and compatible sites screened in the initial stages 1 and 2 were then subject to stage 3 assessment using professional judgement by Officers and using the objectives and decision-aiding questions in the SA Framework. This approach was appraised independently by Enfusion in July 2007 and considered to be appropriate and meet with requirements for Sustainability Appraisal. Appendix 5 of this SA Report shows a summary of the stage 3 assessment carried out by MTCBC with relative progression towards development sustainability objectives for each site.

HRA Screening of the Preferred Strategy

- 2.7 The Habitats Regulations Assessment Screening of the LDP Preferred Strategy was undertaken by Enfusion Ltd in accordance with the official Welsh guidance and current practice. The approach combined both a plan focus and a site focus.

⁵ Sustainability Threshold Assessment Carroll BA RTP1 2005

Appraising the Deposit Plan 2008

- 2.8 The Deposit Plan was developed subject to SA by Enfusion Ltd in July-September 2008. The Deposit Plan policies were appraised using the SA Framework of Objectives for sustainability (see also Section 3) and the detailed working matrices are reported separately in Appendix 7 of this SA Report. Changes made to the Deposit Plan as a result of the SA process are detailed in Section 5 of this SA Report.

Appraising the Deposit Plan Site Allocations 2008

- 2.9 The three stage site assessment method was developed and refined by the Council with assistance from Enfusion Ltd during July-August 2008. This builds upon the earlier Preferred Strategy approach with a detailed site assessment proforma matrix. The SA framework objectives and decision-aiding questions were refined to avoid duplication with the constraints analyses in stages 1 and 2 and to make the questions more relevant to sites assessment. It was also necessary to better define the thresholds and standards that would be used to differentiate between development that was problematical and development that was more readily mitigated or negotiated. Where needed, a commentary supported by available evidence and/or reasoning would be provided with the assessment using STA. The refined SA Framework is presented in Appendix 8.
- 2.10 Sustainability Threshold Assessment (STA) was used as a systematic and pragmatic approach to comparative site selection. STA uses a criteria based approach in a similar way to methods of sustainability appraisal. Five categories of development potential are recognised ranging from absolute sustainability constraints to development, through issues for sustainability that may be mitigated or negotiated, and to sites that have no constraints or where development may be encouraged to help resolve particular issues. Each factor is judged according to its own standards and methods of assessment; there is no weighting and colours are used to help consider cumulative effects and make easier the comparisons between sites and areas. Details are presented in Appendix 8 with a summary of the site assessments in Section 5.

Appraising the Development Proposals by Merthyr Village Ltd 2009

- 2.11 The detailed and revised SA of the proposals submitted by Merthyr Village Ltd followed the same format and methodology from the earlier SA carried out by Enfusion in 2007. The method follows Welsh Assembly Government Guidance and the matrix sets out for each SA objective: the appraisal with comment and discussion, the evidence and reference (where possible), proposed and possible mitigation of any adverse effects. The significance of effects was judged using professional opinion, available evidence, and according to methods/standards relevant to each topic. The refreshed SA

considered information that had become available since the initial SA in 2007.

Comparative Strategic Sustainability Appraisal (SSA) of Growth Strategy 2010

- 2.12 At Examination the Inspector requested additional information including a new comparative strategic SA of the Enhanced Growth Strategy to compare the original SA that includes a 200 ha site at Rhydyar West with a new option of the Enhanced Growth Strategy that does not include the 200 ha site. The comparative SSA was undertaken in 2010. A number of factors had changed since the original SA was carried out in 2007, for example, the WAG has adopted the Code for Sustainable Homes, draft River Basin Management Plans have been published, and climate change policy has a higher profile.
- 2.13 The sustainability assessors sought to retain an independent, objective and reasonable approach at the strategic level using the same SA methods. Since many factors had remained the same, the appraisal focused on commentary for any significant issues that might differentiate the two options. The SA drew attention to any key factors that might have changed and affected both options as a result of major policy changes. These comments were presented in italics to help the reader identify the later SA. Where appropriate for comparison, an additional differentiation in significance was indicated, for example, where one option offers additional benefit over a Dark Green (major positive effect) grading as Dark Green Plus (DG+ very major positive effect).

Appraising the Proposed Changes to the Deposit LDP 2009/2010

- 2.14 Only "significant" changes to a draft plan are required to be reappraised in accordance with the SEA Directive. Accordingly, a screening process was undertaken to identify which of the proposed changes were considered to be "significant" and thus required SA. Professional judgement was used to identify if any significant sustainability effects were likely to arise from the proposed changes, and if so, SA was carried out using the SA Framework as described here in this section.

Summary of SA Method

- 2.15 The method used for this Sustainability Appraisal of the Local Development Plan comprises the following elements:
- Identifying relevant baseline information and other plans or programmes that influence the Local Development Plan, its proposals and policies
 - Using the SA Framework with professional expertise and drawing upon evidence, trends and comparators in the Review of Plans and Programmes, and the Baseline Information

- Commenting on the areas where each element of the Local Development Plan has specific potential impacts - highlighting where possible, positive/ negative effects, short/ long term effects, indirect/ direct effects, cumulative effects, and the reversibility, scale and likelihood of effects, together with recommendations for proposed mitigation or enhancement where identified
- Consultation with statutory and wider stakeholders

Consultation on the SA

- 2.16 The key sustainability issues were identified through the **SA scoping** process that was placed on consultation by MTCBC with the public and other stakeholders during April to June 2006. Comments received as a result of this consultation were reviewed and changes made where possible and relevant; responses are summarised and reported separately in Appendix 2 to this SA Report. In order to ensure a fully participative scoping process, a workshop facilitated by Enfusion Ltd was held on 28 February 2006 at the Civic Centre, Merthyr Tydfil. This offered an opportunity for stakeholders to debate sustainability issues in the County Borough and to consider what the land use planning process can do to assist in addressing them. However, the main purpose of the workshop was to discuss the draft version of the SA Framework and allow stakeholders to contribute to its content.
- 2.17 The LDP Working Groups comprise key stakeholders and community representatives in Merthyr Tydfil and the LDP Steering Group is comprised of leading councillors and Chief Officers of the Authority. All groups convened for the first time in March 2006 and, at that stage, the basis for discussion was the baseline situation, the SA framework and the Vision and Objectives for the Plan.
- 2.18 At the second round of meetings in May 2006, the groups considered the **Draft Strategic Options** for the LDP taking into account net migration assumptions and housing and employment land requirements. At the third round of meetings in September 2006, the groups considered the sustainability appraisal of the three strategy options undertaken by Enfusion Ltd.
- 2.19 Consultation was undertaken on the SA report accompanying the **Preferred Strategy** during April - June 2007. Comments received were considered and taken forward in the development of the Deposit Plan document as appropriate. The consultation comments received on scoping and the SA report together with responses from the Council are provided in Appendix 2.
- 2.20 Consultation was undertaken on the SA Report accompanying the **Deposit Plan**, in accordance with SEA Regulations and SA Guidance, for the period 30 October to 12 December 2008. The Deposit LDP and SA Report were published on the Council's website

www.merthyr.gov.uk and sent to statutory consultees and the wider stakeholder group that were involved in the SA Scoping process.

- 2.21 Representations on the Sustainability Appraisal were made by Merthyr Village Ltd (MVL) and Merthyr Initiative Group (MIG) with regard to the SA of the Strategic Growth Strategy and the exclusion of the 200 ha site to the west of Rhydycar. As a result of this consultation, the Council commissioned further SA studies including a refreshed SA Report of the development proposals by MVL to take account of additional information that had become available since 2007. This was published and available for public consultation in May 2009.
- 2.22 As a result of consultation on the Deposit Plan, the Council recommended a number of changes; further changes were also proposed during the course of the **LDP Examination**. Both the proposed changes to the LDP and the accompanying SA reports were subject to 6-week public consultation and further representations received were duly considered. No further comments on the SA were received.

3.0 SUSTAINABILITY CONTEXT AND OBJECTIVES

Introduction

- 3.1 The SA scoping process was undertaken by MTCBC and reported in the SA Scoping Report published in April 2006. This Section summarises the process undertaken by the Council and the key issues, problems, objectives and opportunities for sustainable development and spatial planning that were identified as a result. The full details of the review of relevant plans and programmes, the baseline information, and the characterisation and sustainability characteristics of Merthyr Tydfil are contained in the SA Scoping Report.

Review of Relevant Plans and Programmes

- 3.2 In order to establish a clear scope for the SA of the LDP it is necessary (and a requirement of SEA) to review and develop an understanding of the wider range of “*policies, plans, programmes and sustainability objectives*”⁶ that are relevant to the LDP. This includes International, European, National, Regional and local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the LDP could help fulfil them and avoid conflict.
- 3.3 An initial list of plans and programmes was put forward in the LDP SA/SEA Scoping Report published in April 2006. During consultation on the Scoping Report, a number of additions were suggested and then incorporated into the final version presented in Appendix 3, which was published as part of the revised SA Scoping Report (June 2006).
- 3.4 The key issues and opportunities identified for Merthyr Tydfil from the review of relevant plans and programmes (PPs) include:
- The need for a coherent framework for service delivery across the County Borough;
 - Recognising the importance of a high standard of living, including a good quality environment, and good health and well-being;
 - Improving access to housing for all socio-economic groups by promoting new housing to improve quality of life;
 - Supporting healthy communities by meeting the spatial aspirations for formal health provision and the ability to improve healthy living through informal activities.
 - Developing an integrated transport structure;
 - Improving public transport to promote social inclusion;
 - Supporting the creation of new employment and regeneration opportunities;

⁶ *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* ODPM, November 2005

- Promoting employment opportunities and standards of living through the role of education.
- Protecting and enhancing the quality of the landscape and environment, including its local distinctiveness and historical and cultural associations;
- Conserving and enhancing the biodiversity of Merthyr Tydfil;
- Improving access to the countryside;
- Adhering to the waste hierarchy and maximising recycling opportunities.

Description of Baseline Characteristics

- 3.5 Collection of baseline information is required under SEA legislation, and is fundamental to the SA process to provide a background to, and evidence base for, identifying sustainability problems and opportunities in Merthyr Tydfil, and providing the basis for predicting and monitoring effects of the LDP. To make judgements about how the emerging content of the LDP will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in Merthyr Tydfil County Borough today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the County Borough to allow the potential effects of the LDP to be adequately predicted.
- 3.6 The LDP Manual produced by the WAG in 2006, proposes a practical approach to data collection, recognising that information may not yet be available, and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the SA process guides plan making and as new information becomes available.
- 3.7 As part of the Scoping stage MTCBC compiled baseline information in a table (Appendix 4) showing data for Merthyr Tydfil compared with data, where available, for South East Wales, England and Wales. The baseline sought to identify targets and trends, while also summarising the key issues arising for particular SA topics.
- 3.8 SA Guidance advises that, where possible, information should be collated to include:
- 'comparators' - (i.e. the same information for different areas) - as points of reference against which local data may be compared
 - established targets, which will highlight how far the current situation is from such thresholds
 - trends - to ascertain whether the situation is currently improving or deteriorating

- 3.9 The collected baseline information together with the key issues of the PP review, have informed the development of the SA Framework. The final version of the Framework is set out in Table 1.

Limitations and Assumptions

- 3.10 The LDP Manual⁷, produced by WAG in 2006 requires that difficulties encountered with data collection be identified. There is a wide range of information available for the County Borough that can be used to profile the current conditions of the environment. However, the information is often held by a range of national and regional organisations within different datasets. In addition, the baseline dates relative to those datasets are sometimes inconsistent. The main issues surrounding the collection of the baseline information (and subsequently the development of the indicators, see Section 6) are:
- Data was not always available at the local level. It was considered that using national or regional data would not be an adequate substitute as it would have failed to give a clear indication of the main issues affecting the County Borough;
 - Information was often only available on specific issues, and did not necessarily match the ideal sets of information in terms of the environmental, economic and social baseline of the County Borough;
 - It was difficult to identify trends for a number of the indicators due to limited data.

The Sustainability Characteristics of Merthyr Tydfil⁸

- 3.11 Merthyr Tydfil is situated in the Heads of the Valleys Region and is the smallest local authority in Wales with an area of around 11,100 hectares. Approximately one fifth of the County Borough lies within the Brecon Beacons National Park to the north, leaving some 8,668 hectares of land under the planning control of the County Borough. The County Borough's other neighbouring authorities are Rhondda Cynon Taf County Borough Council to the west and Caerphilly County Borough Council to the east and south.
- 3.12 Merthyr Tydfil has a population of approximately 54,600, of which approximately 44,000 reside in the main town of Merthyr Tydfil which functions as the main commercial, retail and service centre of the County Borough and the Heads of the Valleys Region. As such, the main town of Merthyr Tydfil contains administrative headquarters (e.g. the County Council), the primary shopping areas, the majority of employment opportunities, a hospital and many other higher order services and facilities which serve surrounding settlements. The remainder of the population are distributed amongst eight interdependent settlements situated further south along the Taff and

⁷ *Local Development Plan Manual*, WAG, June 2006

⁸ MTCBC Deposit Plan 2008

Taff Bargoed river valleys. These settlements contain more limited job opportunities and a range of lower order services and facilities serving local needs.

- 3.13 Merthyr Tydfil fulfils a key strategic role at the centre of the Heads of the Valleys region, benefiting from high levels of accessibility through its location at the intersection of the A470 (T) and A465 (T) strategic transport corridors in the north, and the A470 (T) and A472 strategic transport corridors in the south. The County Borough lies just 25 minutes north of Cardiff and the M4 corridor. Currently 600,000 people and 150,000 jobs are within 30 minutes of Merthyr Tydfil.
- 3.14 Accessibility by public transport both to and within the County Borough varies considerably and in certain areas, remains quite poor. An hourly train service operates to Cardiff where onward connections are available, but this suffers in terms of timetabling, frequency of service, reliability and the integration between different modes of transport. Insufficient public transport limits the ability and choice of the local labour force without access to a car to seek employment opportunities and to have equal access to shopping, cultural and leisure opportunities. The proportion of working-age households without a car in Merthyr is 26%, the highest rate in Wales.
- 3.15 Notwithstanding this, improving accessibility means that Merthyr is well placed to benefit from any future economic growth. In particular, the ongoing dualling of the A465 (T) will contribute to the establishment of an important new growth corridor across the Heads of the Valleys, and improvements to the frequency of the train service will enhance levels of access to Cardiff and beyond.
- 3.16 Merthyr Tydfil is facing considerable economic and social challenges that have arisen from the economic restructuring of the late 20th Century. This restructuring process has impacted negatively on the socio-economic conditions of the County Borough and has resulted in a 7.5% fall in population between 1991 and 2004, the greatest amongst all Welsh local authorities. The effect of fit, younger people leaving to take up employment, or to enter higher education, has left sicker, older and more disabled population and has contributed to a high rate of dependency. There are currently 71 dependents for every 100 people of working age, which is higher than the Welsh average.
- 3.17 The socio-economic condition of Merthyr Tydfil is such that most of the electoral divisions fall within the 20% most deprived in Wales. The County Borough compares poorly with the averages of England and Wales in respect of all key socio-economic indicators and faces some significant challenges, including: high levels of economic inactivity; low educational attainment and skill levels; low quality jobs and opportunities; and high incidences of long term health problems.
- 3.18 The number of jobs in Merthyr has been steadily increasing since 1998, due primarily to increases in the public administration, education and

health sectors, and in recent years, manufacturing, transport and communications and construction. However, despite this growth the County Borough's job-density, economic activity rates and wage levels remain lower than the Wales and UK averages. Moreover, many of the sectors strongly represented in the County Borough are not expected to grow over the next 15 years and the County Borough is not well represented in the likely "key growth" sectors such as air transport, computing services and financial and professional services.

- 3.19 The quality and mix of housing within Merthyr Tydfil is not of a high standard and needs to be improved if people are going to relocate into the County Borough. Currently around 60% of the housing stock in the County Borough remains of the terraced variety. Many of which were built before 1919. The Welsh Housing Condition Survey (1998) also indicates that the highest proportion of unfit housing in Wales is in Merthyr Tydfil – around 12% of the total.
- 3.20 The County Borough comprises of a mixture of urban, semi-urban and rural communities situated in a rich and varied natural and semi-natural environment containing exceptional wildlife habitats, historic landscapes and archaeological features. The steeply sloping valley sides with their high ridges and moorland vegetation define the character of the area and provide an environmental and ecological context for the settlements of the County Borough.
- 3.21 Two thirds of the LDP area is semi-natural in character. It consists of a complex array of landscape types including open moorland, common land, broad-leaved and coniferous woodlands, agriculturally productive land, semi-improved grassland, old industrial landscapes and reclaimed areas.
- 3.22 Merthyr Tydfil benefits from a range of environmental resources with a number of sites in the County Borough identified as having particular biodiversity and/ or nature conservation importance. These include 1 Local Nature Reserve, 2 Sites of Special Scientific Interest and 11 Sites of Importance for Nature Conservation.
- 3.23 In addition, the shallow basin in which the town of Merthyr Tydfil is situated is included in the Register of Landscapes, Parks and Gardens of Special Historic Interests in Wales (Part 2) and the built fabric of the Merthyr Tydfil reflects a rich heritage ranging from imposing bridges and viaducts to more humble workers cottages. The County Borough has 3 Conservation Areas and over 200 Listed Buildings and Ancient Monuments. The full potential of Merthyr Tydfil's industrial heritage as a tourist resource has yet to be realised.
- 3.24 The historical development of Merthyr Tydfil has been heavily influenced by the location and exploitation of mineral resources. There are a number of resources that continue to be worked within the borough as well as further reserves of coal and sandstone.

Key Sustainability Issues, Problems and Opportunities

- 3.25 It is important to distil the key sustainability issues, problems and opportunities relevant to the County Borough from the collated information and consideration of the particular character of the area. These issues are considered to be priorities for consideration through the Sustainability Appraisal, and the SA Framework of sustainability objectives seeks to address them.
- 3.26 The following key sustainability issues are considered to be priorities for sustainability, arising from the particular characteristics, pressures and opportunities currently affecting Merthyr Tydfil:
- Regeneration of the main town of Merthyr Tydfil so it can successfully function as a service and employment hub for surrounding settlements within the Heads of Valleys Region. There is a need to develop sustainable transport links with the surrounding valley settlements to ensure that the higher order services and employment opportunities available are accessible to all.
 - Develop resource efficient settlement patterns served by an efficient and sustainable transport system. Opportunities need to be taken to integrate land use with transport and improve the integration of different transport modes. The use of brownfield land in preference to Greenfield sites need to be optimised and the sustainable use and management of natural resources needs to be promoted.
 - Provide a suitable mix of high quality housing, including affordable, is crucial to help retain and attract people to the County Borough. All new housing developments also need to be well served by essential services and facilities.
 - Create a competitive business and investment environment in Merthyr Tydfil. An adequate range and choice of good quality employment land is required to be attractive to the market.
 - Progress towards reducing levels of social deprivation and high unemployment within local communities needs to continue. Central to this is the need to provide accessible jobs, services, and facilities, particularly for those who do not have access to the private car, such as the young, elderly, disabled and those of low-income.
 - Merthyr Tydfil has one of the poorest health profiles in Wales with a lower life expectancy than the national average for males and females. Improvements need to be made to the mental and physical wellbeing of local people through providing accessible leisure and recreational opportunities and maximising the potential for activity by foot or by bicycle.

- Create an attractive and safe living environment through securing well designed development to reduce opportunities for crime, disorder and anti-social behaviour.
- Greater emphasis on safeguarding and enhancing the historic environment. Opportunities need to be taken to allow residents and visitors to explore the culture and history of the County Borough. Development should be sensitively designed so that it respects the areas historic fabric and is locally distinctive.
- There is a need to balance population growth and address the current trend of a declining and ageing population. New development should incorporate measures to protect and enhance the natural environment and increase access to the countryside.
- Combat climate change and adapt to any inevitable impacts. The highest standards of resource and energy efficiency and renewable energy technologies need to be secured in new development, which will not only help to reduce CO₂ emissions but will also assist in tackling fuel poverty.

The SA Framework

- 3.27 The proposed SA Framework provides the basis by which the sustainability effects of emerging Local Development Documents will be described, analysed and compared. It includes a number of sustainability objectives, elaborated by 'decision-aiding questions'. These have been distilled from the information collated during the review of relevant Plans and Programmes and the review of Baseline Information (as detailed in Sections 2 and 3 of this report, respectively), the key sustainability issues identified (as detailed in Section 4 of this report), as well as through consultation with statutory bodies and key stakeholders.
- 3.28 The sustainability objectives seek to address and progress the main sustainability issues and opportunities identified as important in Merthyr Tydfil. The decision-aiding questions assist by clarifying the detail of the issues, improving objectivity, ensuring that the appraisal is relevant to land use planning, and making the SA Framework more locally specific.
- 3.29 The SEA Directive requires that the effects of the LDP upon biodiversity; landscape; cultural heritage; water; air; climatic factors; soil; flora; fauna; human health; population and material assets are considered. To demonstrate compliance with the SEA Directive, it has been indicated within the SA Framework which sustainability objectives progress which of these SEA topics. (The relevant SEA topics are italicised within the Framework).
- 3.30 The framework was updated (in the Revised Scoping Report June 2006) to accommodate recommendations resulting from the scoping

workshop exercise held in February 2006. These changes are marked in red and underlined (additions) and ~~strike through~~ (deletions).

Table 1: The SA Framework

	SA OBJECTIVE	DECISION AIDING QUESTIONS (WILL THE POLICY OR PLAN...?)
1	Housing (<i>Topic Area in SEA Directive: Population and Human Health</i>)	
	Meet the overall housing requirement through a mix of dwelling types catering for all needs to promote integrated and thriving communities	<ul style="list-style-type: none"> ■ Ensure the allocation of sufficient and appropriate land to meet the housing need ■ Help deliver good quality housing ■ Promote a mix of housing size, type and tenure within each settlement ■ Promote housing that meets the requirements of those with special needs ■ Help meet affordable housing needs to allow local people to remain within communities ■ Protect and enhance the existing traditional housing stock including the characteristic terraces where appropriate
2	Cultural Heritage (<i>Topic Area in SEA Directive: Cultural Heritage</i>)	
	Promote and protect Welsh Culture and Heritage including landscape and archaeology	<ul style="list-style-type: none"> ■ Protect and enhance areas and buildings of historical, archaeological or cultural importance including the historic landscape whether protected by legislation or not ■ Promote, protect and enhance the industrial heritage ■ Promote sustainable access to cultural and historic sites ■ Support the Welsh language
3	Communities (<i>Topic Area in SEA Directive: Population</i>)	
	Encourage population retention and growth; and promote integrated and distinctive communities with opportunities for living, working and socialising for all	<ul style="list-style-type: none"> ■ Encourage provision of local community facilities and employment opportunities in accessible locations ■ Promote equality of access for all ■ Assist in creating safer communities
4	Health (<i>Topic Area in SEA Directive: Human Health</i>)	
	Promote services and facilities that encourage a healthy and safe lifestyle	<ul style="list-style-type: none"> ■ Promote provision of and access to healthcare facilities which are in accessible locations ■ Prevent air pollution, unacceptable levels of noise, light and odour <u>and other pollution health risks</u> in sensitive areas ■ Protect, promote access to and encourage provision of formal and informal open spaces, including allotments ■ Promote provision of facilities for physical recreation and play
5	Economy and Employment (<i>Topic Area in SEA Directive: Population,</i>	

	<i>Material Assets and Human Health)</i>	
	Encourage a thriving and sustainable economy with a diverse range of job opportunities	<ul style="list-style-type: none"> ■ Ensure the allocation of sufficient and appropriate land to meet the economic and employment needs of the County Borough ■ Assist in the growth of localised economies within communities including support for neighbourhood retail facilities ■ Facilitate development to support, enhance and diversify the rural economy ■ Encourage sustainable tourism and leisure opportunities ■ Promote opportunities for starting small business ■ Promote a town centre that provides a range of retail, employment, residential, leisure and cultural opportunities. ■ Promote a diverse range of job opportunities for a variety of skills ■ Maximize employment opportunities and diversify employment structure ■ Promote jobs in accessible locations within the County Borough ■ Accommodate employment training facilities ■ Support a sustainable retail hierarchy that reinforcing the viability of the town and neighbourhood centres ■ Encourage opportunities for home working
6	Transport (<i>Topic Area in SEA Directive: Population and Climatic Factors</i>)	
	Assist in reducing the need to travel and promote more sustainable modes of transport	<ul style="list-style-type: none"> ■ Promote adequate alternatives to the private car and improve public transport links ■ Encourage better access to poorly served communities across the County Borough ■ Encourage and protect safe and attractive walking and cycling routes ■ Optimize the use of car parking land in the town centre ■ Encourage the provision of park and ride schemes ■ Promote travel plans for new developments that are likely to have significant transport implications
7	Built Environment (<i>Topic Area in SEA Directive: Material Assets</i>)	
	Encourage a high quality built environment that promotes community pride	<ul style="list-style-type: none"> ■ Ensure high standards of design in all new development ■ Protect and enhance local character and distinctiveness whilst recognising the role of innovation in the built environment ■ Promote methods of sustainable construction ■ Promote environmentally sympathetic infrastructure for people and wildlife e.g. wildlife corridor creation / protection ■ Promote higher density development where

		appropriate
8	Landscape (Topic Area in SEA Directive: Landscape)	
	Facilitate the protection and enhancement of the countryside and landscape character	<ul style="list-style-type: none"> ■ Promote sustainable management and use of the landscape including its character, geology and ecological features ■ Protect and enhance existing landscapes ■ Promote opportunities for access to and enjoyment of the countryside
9	Biodiversity (Topic Area in SEA Directive: Biodiversity, Flora and Fauna)	
	Protect and enhance the diversity and abundance of wildlife habitats and native species	<ul style="list-style-type: none"> ■ Protect and enhance wildlife habitats and species ■ Prevent habitat fragmentation and encourage habitat creation ■ Take a holistic view of ecosystems, rather than focusing on 'islands' of protected species ■ Protect and enhance the biodiversity within the water environment
10	Water (Topic Area in SEA Directive: Water)	
	Ensure the protection and enhancement of the water environment	<ul style="list-style-type: none"> ■ Encourage riverside and water based recreational activities (e.g. angling, canoeing) ■ Help to reduce and/or avoid pollution to the water environment ■ Promote <u>sustainable water management including promotion of the</u> use of sustainable drainage systems ■ Manage, <u>reduce</u> and avoid exacerbating flood risk ■ Protect groundwater sources ■ Prevent new development that will exacerbate current foul drainage problems ■ Encourage the provision of adequate sewerage infrastructure in new development
11	Climate Change (Topic Area in SEA Directive: Climatic Factors)	
	Help to minimise the cause and effects of climate change	<ul style="list-style-type: none"> ■ Encourage the provision of habitat routes to allow species to adapt to the changing environment ■ Help reduce greenhouse gas emissions ■ <u>Reduce flood risk to people and property, and maintain integrity of floodplain</u>
12	Energy (Topic Area in SEA Directive: Climatic Factors and Air)	
	Encourage the supply of renewable energy and a reduction in energy consumption	<ul style="list-style-type: none"> ■ Promote energy efficiency ■ Encourage the development of <u>appropriate</u> renewable energy schemes ■ Encourage high standards of energy efficiency design in new development
13	Land and Soils (Topic Area in SEA Directive: Soil)	
	Promote efficient use of land and soils	<ul style="list-style-type: none"> ■ Encourage safe and suitable restoration of appropriate previously developed land ■ Prioritise the reuse of previously developed land and buildings particularly those in accessible locations

		<ul style="list-style-type: none"> ■ Optimise the use of Brownfield land ■ Help prevent pollution to land and soils
14	Waste (Topic Area in SEA Directive: Water, Soil, Human Health and Population)	
	Promote the minimisation of waste, especially waste to landfill	<ul style="list-style-type: none"> ■ Identify sites to assist in efficient and sustainable waste management ■ <u>Encourage the re-use of materials</u> ■ Assist improvement in recycling performance by promoting the provision of appropriate domestic and commercial facilities ■ Support development of alternatives to landfill, including composting facilities and energy from waste
15	Minerals (Topic Area in SEA Directive: Material Assets)	
	Promote efficient and appropriate extraction and use of minerals in a manner that minimises social and environmental impacts	<ul style="list-style-type: none"> ■ Safeguard identified mineral resources ■ Promote efficient extraction of identified minerals where there is need ■ Ensure mineral extraction has minimal social and environmental impacts ■ Promote the reuse and recycling of aggregates on demolition, construction and excavation sites

3.31 Undertaking the Sustainability Appraisal of the emerging Local Development Plan involved appraising the Preferred Strategy and the subsequent Deposit Plan against the SA Framework. For each option/policy, a matrix is prepared. Within the matrix, a 'score' is assigned for each sustainability objective using the key shown below. This score is accompanied by commentary setting out the justification for the score. The scores and commentary are then used to identify opportunities to reduce conflicts with sustainability objectives, and increase progression of sustainability objectives.

3.32 SA is an ongoing and iterative process and as such the SA Key has undergone minor alterations over the course of the SA process. For the appraisal of the Deposit Plan, the key was refined by separating 'neutral' from 'unknown'. The Key used for each Detailed SA at different stages of the LDP can be found in Appendices 5 and 7.

Table 2: Sustainability Appraisal Key

DG	Development actively encouraged as it would resolve an existing sustainability problem
LG	No Sustainability constraints and development acceptable
B	Neutral effect
Y	Potential sustainability issues; mitigation and /or negotiation possible
O	Problematical and improbable because of known sustainability issues ; mitigation or negotiation difficult and /or expensive
R	Absolute sustainability constraints to development
?	Unknown effect

4.0 SA OF PREFERRED STRATEGY 2007

Introduction

- 4.1 SA incorporating Strategic Environmental Assessment was carried out on the Preferred Strategy for Merthyr Tydfil. This section summarises the key findings from the SA of the Preferred Strategy. The full report, including the main report text and detailed appendices was previously published for consultation and can be viewed at www.merthyr.gov.uk.

SA of Preferred Strategy Vision and Objectives

- 4.2 A compatibility analysis of the Preferred Strategy Objectives (Appendix 5) was carried out against the SA Framework of objectives for Merthyr Tydfil as identified through the SA scoping process during June 2006 by Enfusion Ltd.

Summary of SA Recommendations and Progression

- 4.3 The Preferred Strategy Objectives were found to be broadly compatible with the SA Framework objectives. The majority of the LDP objectives integrated sustainability aspirations and principles well, and therefore none of them are incompatible when tested against the SA Framework. The SA recommended that the headings (i.e. social, economic and environmental) under which the objectives were grouped should be removed as they address a variety of inter-thematic issues and would therefore be more effective in guiding sustainable development. There was also potential to improve the compatibility of the LDP objective "To provide better access to work, shopping, cultural and leisure opportunities" with environmental SA objectives by adding "by sustainable means".

SA of Strategic Options

- 4.4 The Draft Strategic Options Report was published by MTCBC in June 2006 and was subject to an initial SA process during this period. The Sustainability Threshold Assessment method (STA) was used to provide a strategic overview of the performance of the three Spatial Strategy Options (Enhanced, Moderate and Non-Intervention) against the SA objectives. An outline of each of the LDP Spatial Strategy options is set out in the Draft Strategic Options Report published by MTCBC in June 2006.

Non-Intervention Strategy

The LDP accepts that Merthyr Tydfil County Borough will continue to experience a declining population throughout the plan period (2006-2021) and will seek to manage this as effectively as possible.

Moderate Growth Strategy

The LDP will aim to facilitate a reduction in current levels of out migration from the County Borough so that population levels stabilise

by 2016 and a 5-year period of moderate growth is achieved thereafter.

Enhanced Growth Strategy

The LDP will aim to facilitate a reduction in current levels of out migration from the County Borough so that population levels stabilise by 2011 and a 10-year period of enhanced growth is achieved thereafter.

Summary of SA Recommendations and Progression

- 4.5 The findings from the SA suggested that the Enhanced Growth option could have a greater potential to become the most socio-economically sustainable strategy compared to the Moderate Growth and Non-Intervention options. This is particularly with regard to strongly progressing SA objectives for housing, economy and employment with the provision of more new jobs and housing through enhanced growth. The Non-Intervention option is likely to result in a declining population that could threaten economic growth and social well-being and thus would not progress that vision and objectives of the development plan.
- 4.6 Significant adverse effects on the environment from the Enhanced Growth option were indicated by the SA, particularly with regard to biodiversity, water, energy and climate change factors. The Moderate Growth option is likely to have less adverse effects on environmental factors; however it is less able to positively progress the socio-economic factors.
- 4.7 The size and scale of development proposed in the Enhanced Growth option could offer some mitigation through possibilities and viabilities, for example, with regard to renewable energy and green infrastructure in the medium to long-term. To secure such mitigation, there would have to be stringent policies in place to minimise the environmental impacts associated with the increased development proposed - and to ensure that such mitigation could be implemented.

SA of Draft Strategic Policies

- 4.8 The Preferred Strategy published by MTCBC in April 2007 contained 20 draft strategic policies under the Enhanced Growth Strategy. The SA was carried out on these 20 draft strategic policies in October 2006 and the detailed working matrices are presented in Appendix 5. Where there were any potential adverse effects predicted for sustainability or opportunities identified to improve the sustainability of the Preferred Strategy, recommendations were made.

SA Recommendations and Progression

- 4.9 Overall, the strategic policies positively progress the SA objectives. Tailoring growth into different sizes and functions throughout the County Borough, and consolidating development within the settlement boundaries, progresses the sustainability objectives – and this is likely to be reinforced over time when implemented in conjunction with more detailed development control policies.
- 4.10 Minor adverse effects, for example, on the use of minerals through the dramatic scale of the anticipated growth could be mitigated through policies that encourage sustainable construction practices. Similarly, other minor issues associated with waste and access could be mitigated through construction type, operational processes and building management.
- 4.11 Generally, the SA recommended that the draft strategies would more positively progress the Borough Council's sustainability objectives by placing greater emphasis on the re-use of land and building to accommodate the anticipated growth. Mitigation could be achieved through amendments to the wording of the strategic policy and through preparation of detailed development control policies.

SA of Preferred Strategy Site Allocations 2007

- 4.12 A three stage site assessment methodology was used to assess potential sites over 0.3 ha and is presented in Appendix 5. Viable and compatible sites screened in the initial stages 1 and 2 were then subject to stage 3 assessment using professional judgement by MTCBC and using the objectives and decision-aiding questions in the SA Framework (Appendix 5). This approach was appraised independently by Enfusion Ltd and considered to be appropriate and meet with requirements for Sustainability Appraisal. A summary of the stage 3 assessments using the SA Framework is presented in Appendix 5. The summary includes additional sites put forward after the Preferred Strategy was published in April 2007.

SA of Development Proposals by Merthyr Village Ltd 2007

- 4.13 In Oct 2007 Enfusion Ltd was commissioned by Merthyr Tydfil County Borough Council (MTCBC) to undertake a SA of the planning application submitted by Merthyr Village Ltd to develop 224 hectares of land on the south western edge of the Merthyr Tydfil Basin. Although this proposal was refused at appeal, the Preferred Strategy still included a 200 hectares site in this location. MTCBC decided that it was appropriate to consider a sustainability appraisal of the detailed proposal put forward by Merthyr Village Ltd so that the impacts of the development of a site of this scale can be more comprehensively assessed. The SA Report of Development Proposals by Merthyr Village Ltd is presented in Appendix 6.

- 4.14 The purpose of the report was to provide Merthyr Tydfil County Borough Council with an independent and detailed sustainability appraisal of the potential impacts of a development of this scale and nature in this location. The earlier planning applications for restoration and re-profiling of the site and the outline application provide an indication of the density and type of development which developers will consider appropriate and viable for such a site.
- 4.15 The findings from the Sustainability Appraisal indicate that development of the site would cause certain irreversible environmental damage in connection with ecology and archaeological factors. This has to be considered against the need to improve the social and economic aspects of the Borough. Whilst the application performed reasonably well against social and economic objectives, the Council had to decide if these benefits outweighed the extent of the environmental damage; how important is the environmental resource in the context of the Merthyr area and South Wales?
- 4.16 The findings of the SA also suggest that, in consideration of existing available employment land and sites better related to the town, there appears to be reasonable doubt that implementation of the Enhanced Growth Strategy development needs to incorporate a single site of this scale in this location. Whilst the applicants put forward the option that this site is the most appropriate way to bring social and economic improvements to the Borough this needs to be illustrated through further studies and detailed proposals.
- 4.17 In its current form the SA indicated that the development proposal does not represent a sustainable form of development. However if the allocation of 200ha of land in this location remains as part of the Preferred Strategy, the SA report suggests further methods and mitigation to increase the sustainability of the site.
- 4.18 Members of Enfusion staff undertook a visit around the periphery of the site on the 10 October 2007 when the site was fenced due to concerns over public safety, which was noted in the detailed matrix presented in Appendix 6. Being aware of this issue, the SA was undertaken on the understanding that any permission granted on the site would be subject to the guidance in PPG 14: Development on Unstable Land. Since the date of writing this report a planning application relating to works to ensure the stability and safety of the site has been received by MTCBC.

Habitats Regulations Assessment

- 4.19 The HRA of the Preferred Strategy considered ten European sites within a 15km search area around the Authority's boundaries. Of the ten sites considered, six were screened out through analysis conducted as part of a pre-screening assessment. Four sites were further assessed by considering the key impacts identified as arising from the policy screen and LDP Preferred Strategy review, against the factors required to

maintain European site integrity including the conservation objectives of the individual SACs. The screening assessment also considered the potential for in-combination effects arising from interactions with surrounding plans and programmes.

- 4.20 The screening assessment showed that the LDP Preferred Strategy policies in implementation will not have a significant effect on the four SACs considered in the assessment. The LDP Preferred Strategy was identified as having strong policy measures that ensure the protection of environmental quality and that reduce the likelihood of the indirect effects identified causing adverse impacts. The possibility of in-combination effects is significantly reduced where the plan alone is not implicated.
- 4.21 The HRA Screening assessed that the LDP Preferred Strategy plan should proceed without further reference to the Habitats Regulations, but, that the assessment findings should be reviewed iteratively as the plan develops to consider any significant changes, should they arise.

5.0 SA OF DEPOSIT PLAN 2008

Introduction

- 5.1 The Deposit Plan is the next stage in the production of the Local Development Plan for Merthyr Tydfil County Borough and follows the 'Preferred Strategy' consultation carried out in May/June 2007. SA incorporating SEA was carried out on the emerging Deposit Plan document. A compatibility analysis of the Vision and Strategic Objectives was carried out using the SA Framework of objectives for sustainability and planning in July 2007. An SA of the Deposit Plan policies, (including changes made to the policies since the Preferred Strategy SA) was undertaken in July-August 2008. This was then revised further in late August 2008 to account for further changes to the policy as a result of recommendations made by the SA. A revised site assessment method was developed during July-August 2008. This builds upon the earlier Preferred Strategy approach with a detailed site assessment proforma matrix. Sustainability Threshold Assessment (STA) was used during August-September 2008 as a systematic and pragmatic approach to comparative site selection. The detailed appraisals are presented in Appendix 7, and summarised below.

SA of Deposit Plan Vision and Strategic Objectives

Vision

"Between 2006 and 2021, the Local Development Plan will ensure that the development and use of land in Merthyr Tydfil is undertaken in a sensitive manner following a holistic approach with the concept of sustainability as its core. In this way, the ambition of the Plan is to reflect the expectations of the community to:

- facilitate sustained growth;
- promote social inclusion;
- safeguard the environment; and,
- provide an excellent quality of life for all."

- 5.2 Broadly speaking the vision performs well against the majority of SA objectives, particularly against those relating to integrated communities, health and the environment.
- 5.3 A compatibility analysis of the Strategic Objectives was carried out using the SA Framework of objectives for sustainability and planning in December 2006. The LDP Strategic Objectives have since been revised (partially as a result of SA recommendations), and further assessment was carried out below.

Strategic Objectives:

SO1. To capitalise on Merthyr's strategic position, further developing

	its role as the main commercial, service and employment centre in the Heads of the Valleys area by focusing development within the main town of Merthyr Tydfil.
SO2.	To focus appropriate levels of development within the County Borough's smaller valley communities to create affordable and attractive places to live with good access to jobs and services.
SO3.	To promote regeneration through the use of suitable and appropriate brownfield land rather than greenfield sites.
SO4.	To support the principle of sustainability via an energy efficient land use/ transport strategy
SO5.	To manage natural resources wisely avoiding irreversible damage in order to maintain and enhance their value for future generations.
SO6.	To provide a range of dwelling sizes and types, including affordable and special needs housing, which support the needs of the local community, attract new inhabitants to the area and create mixed and socially inclusive communities
SO7.	To improve and diversify the economy, safeguarding existing jobs and creating a range of new job opportunities in a sustainable manner
SO8.	To promote social inclusion and ensure equality of opportunity through reducing the need to travel and providing better access by sustainable means to employment opportunities, community facilities and services.
SO9.	To promote health and wellbeing by providing accessible and varied opportunities for leisure and recreational activities.
SO10.	To ensure good quality design of new development and the creation safer communities.
SO11.	To ensure the continued protection and enhancement of the natural, cultural, built and historic environment.
SO12.	To contribute towards reducing the impact of climate change through reduced carbon dioxide emissions in new developments.

- 5.4 The Deposit Plan Strategic objectives perform well against the SA framework. Some of the key sustainability issues are addressed through the objectives, such as the requirement for more affordable housing, improving public transport and reducing dependence on the private vehicle and the improvement of the local economy.
- 5.5 The Local Development Plan Objectives have been revised since the Preferred Strategy (2007) consultation, and the recommendations from the initial SA have been incorporated, such that the revised Strategic Objectives are no longer grouped under headings (i.e. social, economic and environmental). The recommendation to add 'by sustainable means' to the objective relating to better access to employment opportunities, community facilities and services has also been added to SO8.

- 5.6 The Revised Strategic Objectives now also contain reference to the health and wellbeing of the population through the provision of accessible and varied opportunities for leisure and recreational activities, which will have positive effects on the health and cohesiveness of communities. There is also an additional objective that seeks to reduce the impact of climate change through reducing carbon emissions in new developments, which will have long-term positive effects on air quality and reducing flood risk. Smaller communities within the Borough are also recognised along with the need to focus appropriate development in a bid to improve housing, employment and services in these areas, which will have positive impacts on social exclusion and issues surrounding access.
- 5.7 Previous objectives relating to sustainable tourism, minimising waste, renewable resources, the improvement of the urban fabric and the reduction of poverty and disadvantage have been removed.

SA of Deposit Plan Policies

- 5.8 The Deposit Plan contains three tiers of policies to provide an effective and sufficiently tailored framework to help facilitate Merthyr Tydfil's future development and change.
- Borough-wide strategic policies translate the spatial priorities into distinct policy mechanisms that set out the general criteria against which planning proposals will be considered having regard to the LDP's Vision, Primary Aim and Strategic Objectives.
 - Area-specific policies complement the borough-wide policies and provide site-specific detail to help deliver the LDP's strategy on the ground. These policies are often complemented by specific land use allocations on the LDP proposals maps and have been formulated on the basis of a number of robust assessments pertaining to the availability of land and its suitability for particular uses together with the likelihood of it being developed during the Plan period.
 - Criteria-based policies set a framework for assessing any unforeseen proposals or for addressing circumstances that did not feature prominently in the previous policy tiers due to there being insufficient evidence available to justify their consideration as more strategic issues.

Borough-wide Generic Policies

Policy BW1: Development strategy - Primary Growth Area

- 5.9 Concentrated development meets many of the objectives in the Sustainability Framework as it reduces travel by car and ensures reasonable access to health, leisure and education facilities and

employment opportunities. In this instance it also ensures priority use of previously developed land which in turn protects the landscape and maximises land use.

Policy BW2: Development strategy - Secondary Growth Area

- 5.10 As these settlements are smaller and less well connected to major facilities they do raise some issues of transport and access to facilities but they are inter dependant and closely linked and have public transport links to larger settlements. Social issues and environmental issues such as landscape, water and biodiversity have been given due consideration. As the level of development will be relatively small the adverse impact will be contained.

Policy BW3: Development strategy - Other Growth Areas

- 5.11 These settlements are smaller, dispersed and less well connected to major facilities raising the issues of transport and access to facilities, but they do have public transport links to larger settlements. Social issues and environmental issues such as landscape, water and biodiversity have been given due consideration. As the level of development will be relatively small the adverse impact will be contained.

Policy BW4: Settlement Boundaries

Policy TB1: Development outside settlement boundaries

(Note: Due to their inter-relationship these policies were assessed together)

- 5.12 Policy BW4 is an important policy as it defines the difference between principally urban land and countryside. However incorporating a list of developments that "might" be considered reasonable exceptions to the policy, actually weakens the policy and may be to the detriment of other forms of development which are not mentioned such as, health and recycling facilities. On the other had it may lead to false expectations about what might be permitted. The policy needs to be more positive and would benefit from the word "might" which leads to uncertainty when making an assessment and considering moving the list to the supporting text so that the main thrust of the policy is not undermined. Policy TB1 provides the detail to the strategic policy and assists the performance of that policy but could be more explicit on the water environment. There are no major adverse impacts identified.

Policy BW5: Landscape and Biodiversity

- 5.13 The policy will have long-term positive effects on biodiversity through the protection and enhancement of the ecology and supporting habitats of the borough. It will also have positive impacts on the character and quality of distinctive landscapes and will have indirect health benefits through the protection of space for informal recreation, such as walking and cycling. The policy will also ensure that there are no adverse impacts in relation to natural resources and the natural

drainage of surface water. There is potential for the policy to include the protection of natural drainage of groundwater as well as surface water as changes in the water table can have implications for water based habitats.

Policy BW6: Townscape and Built Heritage

- 5.14 The Policy performs well against SA objectives relating to the built environment, landscape, economy and culture and heritage. Attractive buildings and town centres are important to the tourist economy and encourage inward investment by creating places where people want to live and work. Protection of the setting of conservation areas and listed buildings will sometimes have the effect of also protecting the local landscape. A positive policy which directly addresses the relevant SA Framework objectives but does not result in other indirect negative impacts.

Policy BW7: Sustainable Design and Place Making

- 5.15 The policy will have positive effects on the majority of SA objectives, leading to safe and secure developments that are sensitive to surrounding culture and heritage as well as landscape. The provision of useable outdoor play space and the accessibility of development to other green infrastructure, footpaths and cycle ways will have positive effects on health and the promotion of walking and cycling. The policy will also ensure high levels of resource efficiency through new technologies and the design/ orientation of development. There is potential for the policy to make specific reference to a particular level of the Code for Sustainable Homes as this would remove any doubt as to the requirement of 'high' resource efficiency standards.

Policy BW8: Development and Flood Risk

- 5.16 The policy will have long-term positive effects on SA objective 10 (Water) through reducing flood risk, incorporating Sustainable Urban Drainage Systems and reducing the pollution risks associated with flooding. There will also be indirect positive impacts on minimising the adverse effects of climate change by reducing flood risk to people and housing and helping to maintain the integrity of the floodplain.

Policy BW9: Energy and Climate Change

- 5.17 The policy will have very positive effects on the climate change and energy objectives with indirect potential positive impacts for health and the economy.

Policy BW10: Mineral Safeguarding

- 5.18 The policy positively progresses the SA objective relating to minerals as it seeks to maintain a 10 year land-bank of permitted aggregate reserves. The majority of impacts are unknown as the policy only seeks

to safeguard mineral resources in the Borough within defined parameters.

Policy BW11: Transport, Cycling and Pedestrian Proposals

- 5.19 The policy positively progresses the majority of SA objectives, particularly against those relating to transport, health and climate change. Favouring proposals that ensure improvements to public transport services, integration between transport modes and an increased amount of safe and attractive routes will have positive effects on access to employment, recreational areas and cultural and historic sites. The policy will also favour development proposals that will help to reduce traffic congestion, energy consumption, noise pollution and improve air quality. This will have long-term positive effects on health, the quality of soils and the habitats of the County Borough.

Policy BW12: Development Proposals and Transport

- 5.20 The policy positively progresses a number of the SA objectives especially those relating to transport, climate change and air quality. The policy expects all development proposals to encourage use of transport other than the private vehicle; this will assist in providing people with more sustainable modes of transport increasing accessibility to employment, leisure/ recreation facilities and residential areas. Reducing the need to travel and encouraging the use of transport other than the private vehicle will lead to a reduction in emissions and therefore improvements in air quality. This will have long-term positive effects on the health of communities, habitats and the quality of water and soils. The reduction in emissions will also assist in reducing greenhouse gas emissions having a long-term positive effect on climate change. Fewer private vehicles and reduced congestion will also help to protect and enhance the landscape of the Borough.

Policy BW13: Managing Housing Growth

- 5.21 The detail of this policy has already been considered under Policies BW1, 2 and 3 and is taken into account in this assessment. Overall impact is acceptable due to the need to revitalise the Borough and create more sustainable communities. Concentration of development in the location with the best transport links will assist this policy to perform well.

Policy BW14: Managing Employment Growth

- 5.22 The level of employment land allocation is justified in the background paper and incorporates land which has not been taken up from the preceding LDP. The policy meets requirements to reduce the need for travel and to create a wide range of local employment opportunities, an enhanced town centre and a more vibrant, sustainable economy.

Policy BW15: Community Facilities

- 5.23 A very specific policy which seeks to improve access to, and quality of local facilities. Overall a positive policy with no direct or indirect adverse effects but could be improved by reference to health facilities.

Policy BW16: Protecting /enhancing the network of leisure facilities

- 5.24 A positive policy which addresses the needs of communities and has small indirect traffic and climate change benefits. Ensuring that local community facilities are not lost will stop an increase in leisure related trips which might otherwise take place.

Policy BW17: Securing Community Infrastructure Benefits

- 5.25 The policy makes it clear that contributions will be expected from developers in order to achieve sustainable development. A few areas are identified that do not appear to be applicable to this policy e.g. landscape and built environment. The policy makes reference to affordable housing which is covered in detail in Policy TB4 and specialist social care accommodation which is amplified in Policy TB5. Clarity over community contributions assists developers but should not be at levels which deter development and consequently the provision of housing.

Area Specific Policies

Policy AS1: Housing allocations in the Primary Growth Area

Policy AS2: Housing allocations in the Secondary Growth Area

Policy AS3: Housing allocations in the Other Growth Areas

Policy AS14: Employment allocations in the Primary Growth Area

- 5.26 The SA has considered the implications of the spatial strategy expressed in Borough-wide policies BW1, BW2, BW3 and AS14. These four policies now provide the detail of that strategy and have been appraised by MTCBC staff who have the detailed level of local knowledge to carry out meaningful site specific appraisals. The detailed SA of Deposit Plan site allocation is presented in Appendix 8 and summarised later in this section. The appraisals of the allocations that may be considered more complex were reviewed by Enfusion Ltd to ensure a consistent approach and overview. Recommendations were made to MTCBC that more evidence based data should be provided to the appraisals, to ensure a robust document; of particular concern was the assertion that species translocation could take place from one specific site and provide adequate mitigation. Otherwise the site allocations reviewed were found to be acceptable as the expression of the spatial strategy.

Policy AS4: Historic Landscape

- 5.27 The policy will have positive effects on the cultural value of historic landscapes with indirect benefits for biodiversity and water objectives.

Policy AS5: Green Wedges

- 5.28 A generally positive impact can be expected with no adverse impacts identified. The policy directly addresses the aims of SA objective 8 (Landscape) and will have a long-term, cumulative positive impact through the protection of important open spaces. It will also prevent coalescence of settlements, protecting and reinforcing communities while also safeguarding the setting of the towns, villages and hamlets. Green wedges can also be important habitats and wildlife corridors.

Policy AS6: Local Nature Conservation Designations

- 5.29 A positive policy which protects local nature conservation interests and has indirect landscape and water environment benefits.

Policy AS7: Strategic waste management facilities – locations of choice

- 5.30 A policy which directly progresses waste objectives with no adverse impacts identified. Implementing the waste hierarchy means less landfill; recovering energy from waste will have a minor but positive effect on reducing CO₂ emissions.

Policy AS8: Replacement civic amenity site

- 5.31 The provision of a new civic amenity facility will improve recycling performance and help to reduce waste sent to landfill. This will have a positive effect on SA objectives relating to waste and communities.

Policy AS9: Strategic Highway Improvements

- 5.32 The policy will have a positive effect on the regeneration of Merthyr and will improve the prospects of the economy. However road building does have environmental costs in terms of potential increased carbon emissions.

Policy AS10: Core highway network improvements

- 5.33 The policy will have significant benefits for the economy and some benefits for health and community objectives. As with most road building/ improvement schemes there is always the concern of encouraging increased car use, however the smaller schemes do have the potential to encourage walking and cycling.

Policy AS11: Public transport - rail

- 5.34 The policy positively progresses transport and climate change SA objectives as improvements in rail services will lead to reduced use of the private vehicle. Supporting development proposals that will lead

to improvements in rail services will also have positive effects on access to community facilities, employment opportunities and cultural and historic sites.

Policy AS12: Public transport - road

- 5.35 The policy is closely linked to Policy AS20 which should result in increased housing and retail space in a central town position. Combined with the support for improved bus services this policy should perform well against housing, economy, transport and climate change objectives.

Policy AS13: Life-long learning facilities

- 5.36 The educational attainments of the County Borough are a recognised problem. By facilitating the provision of new premises through land use policies the LDP will assist in supporting the culture, health and economy of the area.

Policy AS15: Key contributors to the Valleys Regional Park

- 5.37 The policy builds on the funding which has been achieved by ensuring that land required for the projects is safeguarded and that only appropriate development takes place. Long-term positive impacts for the economy, landscape, health and biodiversity and no adverse impacts identified.

Policy AS16: New leisure developments

- 5.38 A very specific policy which seeks to assist in the provision of accessible modern leisure facilities. The policy will work well in conjunction with Policy BW16: Protecting/ enhancing the network of leisure facilities. A positive impact with no identified adverse impacts.

Policy AS17: New outdoor sport /play space

- 5.39 The health of the population is a key issue in the County Borough and the provision of well maintained and attractive play and outdoor facilities will be important in addressing the problem. Potential for very positive impact and no adverse impacts identified. The policy will work well in conjunction with Policy BW16: Protecting/ enhancing the network of leisure facilities

Policy AS18: Retail hierarchy

- 5.40 A positive impact in relation to SA objectives which seek equality of access for all and for climate change and transport through the potential to retain and improve the range of goods available locally. There is also potential for improvement to the built environment.

Policy AS19: Merthyr Tydfil Town Centre

- 5.41 The policy performs well against social, economic and environmental SA objectives. The policy clearly recognises the civic role of the town centre as well as its retail function. This will assist in maintaining and improving a vital and vibrant town centre. The supporting text recognises the importance of retaining both leisure and retail spend within the County Borough. There are no adverse impacts identified.

Policy AS20: Retail allocations

- 5.42 The policy performs well through directly meeting specific objectives in relation to the economy and transport. The supporting text recognises the importance of retaining both leisure and retail spend within the County Borough. It also recognises the importance of reducing vehicle trips to access both leisure and retail facilities and seeks to limit such trips to major centres. The policy is also linked to Policy AS12 which proposes the remodelling of Merthyr Tydfil Central Bus Station as part of town centre regeneration. Such improved facilities encourage use of public transport having a positive effect on transport. There are no adverse impacts identified.

Policy AS21: Community Health Facilities

- 5.43 The policy facilitates the provision of health facilities which have been identified by the Health Care Trust. This will have significant benefits for the health of the local population. The new and improved facilities will reduce trips outside the County Borough for medical treatment and therefore has the potential to meet transport and climate change SA objectives. There are no adverse impacts identified.

Topic Based Policies

Policy TB2: Unallocated sites within settlement boundaries

- 5.44 A very positive policy which combines reuse and redevelopment within sustainable locations. Water issues could again be better addressed to improve the performance of the policy. "Windfall" sites are a minor but important part of achieving the housing requirement. As noted in the supporting text to policy BW13 this could amount to achieving around 450 extra units. A positive statement that development, subject to criteria, will be permitted will assist the provision of a range of housing types. A more immediate impact will be experienced as these sites, which tend to be relatively small, are brought on stream faster than the larger allocated sites.

Policy TB3: Changes of use within settlement boundaries

- 5.45 The policy encourages the best use of land in sustainable locations but ensures that community facilities and small employment sites are not lost because of the higher returns associated with residential

development. It also protects the retail function of Merthyr Town. This policy will have an all-round positive impact.

Policy TB4: Affordable Housing

- 5.46 Most of the proposed affordable housing will be on sites which are part of the proposed housing requirement and as such there will be few specific impacts over and above those which have been identified in the SA of Policy BW13. The policy performs well against social objectives and there should be positive long-term beneficial impacts. There may be indirect benefits for health and the economy.

Policy TB5: Special needs housing

- 5.47 The policy performs well against the objectives as it seeks to focus this particular form of development within settlement boundaries. Could there be a sequential test applied to prove that no other site exists for a facility for which there is a qualitative and quantitative need? Addressing these issues would assist the policy in achieving a better performance on social issues. Note: if development outside settlement boundaries is definitely not to be allowed, is this policy needed as it is covered by Policy TB2.

Policy TB6: Caravans, mobile homes and gypsy /traveller accommodation

- 5.48 The policy covers use of mobile homes by the settled i.e. non gypsy/traveller population, the use of land to store caravans etc and the provision of gypsy/traveller sites. None of the criteria are topic specific and the policy does not really come to terms with the issues raised either socially or environmentally. The impacts noted are rather superficial and whilst the policy is not particularly harmful neither does it give clear directions to achieve a sustainable outcome.

Policy TB7: Renewable Energy

- 5.49 A positive policy which directly addresses local, national and global sustainability objectives and concerns.

Policy TB8: Mineral proposals

- 5.50 Production of local aggregates to meet Merthyr's proportional level of contribution to the estimated regional need for aggregate minerals meets transport, minerals and some aspects of climate change objectives. However the production and use of fossil fuels inevitably reduces the performance of the policy and has adverse implications for health and climate change. On the other hand this does mean a secure local energy supply in the short-term while alternative technologies come on stream and the policy concentrates on working out existing sites, thereby reducing long-term adverse impact from coal production. Overall an acceptable policy for the life of the plan.

Policy TB9: Mineral buffer zones

- 5.51 A very specific policy which seeks to ensure that mineral resources are not sterilised through inappropriate development. The policy will have a positive impact with no identified adverse impacts.

Policy TB10: Waste management facilities outside identified locations of choice

- 5.52 The policy will assist the provision of local waste management facilities and in tandem with the policy below will follow the waste hierarchy through reduction of waste, recycling and the reduction of waste to landfill. The policy could be improved by reference to the water environment rather than features.

Policy TB11: Access, parking and accessibility of local facilities

- 5.53 A positive impact in terms of objectives which seek equality of access for all and also for climate change and transport through the potential to discourage use of the car through design and parking standards.

Policy TB12: Freight traffic

- 5.54 The policy performs well through directly meeting specific SA objectives and will have indirect benefits occurring as well. The policy will reduce heavy freight traffic travelling through town centres and villages which can often result in damage to historic buildings and discourage residents from walking and cycling due to safety issues. There are no adverse impacts identified.

Cumulative Effects

- 5.55 The assessment of significant effects undertaken through the appraisal process also requires consideration of secondary, synergistic and cumulative effects. The appraisal has indicated that the policies provide a strong progression of core SA objectives, in particular for housing, communities and the economy.
- 5.56 Health is a significant issue in the County Borough and the SA recognises the positive synergistic impact on general health levels, which are perceived by the population as being poor, through the combined provision of improved education, health and leisure facilities and the protection/ provision of open space.
- 5.57 There are also positive secondary and synergistic effects arising from the combination of policies which relate to the historic landscape, the wider landscape, green wedges, the Valley Regional Park and biodiversity. In combination these will assist in robust protection of the countryside, habitats and species and will also ensure that the

characteristics on which the tourism economy is based are not undermined or destroyed.

- 5.58 Whilst considered as an objective in its own right, the spatial strategy and transport policies are fundamental to achieving the aims identified under climate change and this is recognised in the SA along with the contribution made by renewable energy and energy efficiency policies. Conversely whilst new road building schemes and improvements may have a positive impact on the economy and social objectives in relation to access to facilities, there may be the secondary issue of new roads encouraging use of the private vehicle and thereby increasing CO2 emissions across the County Borough.

SA Recommendations and Progression

- 5.59 The SA of the Deposit Plan Policies has found that, for the most part, the policies are likely to have significant positive County Borough-wide effects on sustainability. A number of recommendations were made throughout the SA of the Deposit Plan Policies - primarily focusing on specific policy issues such as wording or the inclusion of specific criteria levels to avoid any doubt or ambiguity. For example, there is potential for Policy BW7: Sustainable Design and Place Making to make specific reference to a particular level of the Code for Sustainable Homes as this would remove any doubt as to the requirement of 'high' resource efficiency standards. The SA also recommended that it would be more appropriate to use the term '*water environment*' throughout rather than '*water features*' so that groundwater catchment areas etc are given consideration.

SA of Deposit Plan Site Allocations

- 5.60 During August - September 2008 the Council carried out a refined three stage assessment of the Deposit Plan Site Allocations, using detailed local knowledge to carry out meaningful site specific appraisals. The appraisals of the allocations that may be considered more complex were reviewed by Enfusion Ltd to ensure a consistent approach and overview. Viable and compatible sites screened in the initial stages 1 and 2 were then subject to stage 3 assessment using professional judgement and using the objectives and decision-aiding questions in the refined SA Framework (Appendix 8). Thus Plan making and SA processes were effectively integrated at this stage. A summary of the stage 3 site assessments is presented below with the detailed working matrices located in Appendix 8.

SA and Stage 3 Site Assessment Findings

- 5.61 Overall the site allocations perform well against the refined SA Framework and will help to realise the Preferred Strategy. Sites assessed as positive benefit from good transport links and access to a range of facilities. The proximity of sites to areas of open space and recreation are also advantageous. Sites that perform particularly well

against the SA Framework help to address a key sustainability issue. For example, Site E3 (Pant Industrial Estate) benefits not only from excellent public transport links and access to local community facilities but also contributes to the identified need for employment opportunities in the local area.

- 5.62 The stage 3 site assessments draw attention to the need for appropriate mitigation measures to being carried out for particular sites in order to improve the sustainability of proposed developments. For example, Site H33 (Gethin Tip) has cultural and historic interests on site and the proposed development of 150 units has the potential to partially erode a SINC. The site does however offer an opportunity to extend and improve links to the Taff Trail and deliver improvements to the Grade II listed bridge on site. The assessment indicates that the design brief is vital for successful development of this site as it would need to incorporate mitigation measures, for example, the relocation of protected species.

6.0 SA OF SUBMISSION PLAN & LDP EXAMINATION DOCUMENTS 2009-2010

Introduction

- 6.1 In response to representations received during consultation on the Deposit LDP and accompanying SA Report, the Council recommended a number of changes before submitting the LDP for examination. These focused proposed changes were set out in an addendum to the Deposit LDP and subject to SA during August 2009.
- 6.2 Following the pre-hearing meeting of the LDP Examination in October 2009, the Inspector appointed to conduct proceedings considered that certain changes which the Council had classified as minor changes in the Annex to the focused proposed changes addendum, actually, represented more significant changes. As such, they were required to be consulted upon and the Council was requested to produce a further focused proposed changes document. This second addendum was similarly subject to SA and public consultation in October 2009.
- 6.3 Significant representations were received from Merthyr Village Ltd against the removal of the 200 ha site to the west of Rhydycar and the contents of the accompanying SA Report. As a result of this consultation, the Council commissioned a refreshed SA to take account of additional information available since the original SA work was carried out in 2007. The refreshed SA was reported and subject to public consultation in May 2009.
- 6.4 At the Examination, the Inspector requested additional information including a new comparative strategic sustainability appraisal (SSA) of the Enhanced Growth Strategy to compare the original SA that included a 200 ha site at Rhydycar West with a new option of the Enhanced Growth Strategy that excludes the 200 ha site. This SSA was carried out in February 2010 and subject to public consultation.
- 6.5 The Council prepared policy changes in response to issues arising during the Examination of the submission LDP. Changes were screened to identify whether such changes were likely to have significant sustainability effects. Significant changes were subject to SA and the various volumes of work subjected to public consultation in July and December 2010.
- 6.6 The main issues arising from consultation on the Deposit LDP and SA Report and arising during the Examination may be summarised, together with the associated additional SA studies, in the following table:

Table 6.1: Summary of Additional SA Studies 2009-2010

Key Issues arising from Consultation & Examination	SA Reports & Further Consultation
Removal of policy BW9 on energy & climate change; changes in employment land; reduction in affordable housing provision, and new policy BW18 on contaminated land.	SA of Focused and Further Focused Proposed Changes, August & October 2009
Additional information available for SA of 200 ha site west of Rhydycar.	SA (2) of Development Proposals by Merthyr Village Ltd, May 2009
Additional information requested by the Inspector - Comparative SSA of Enhanced Growth Strategy	Comparative SSA of Enhanced Growth Strategy including and excluding site at Rhydycar West, Feb 2010
Policy changes arising from Examination – screened for SA & found to be unlikely to have any significant sustainability effects.	SA of Changes to the LDP arising from Examination, March, May, July & December 2010 - published in July (3 volumes) & December 2010

SA of Focused and Further Focused Proposed Changes (August & October 2009)

- 6.7 The main representations, as judged according to the greatest number received and the likely greatest strategic significance, were associated with the following:
- Mineral safeguarding and operations
 - Affordable housing
 - Removal of site at Rhydycar West since Preferred Strategy stage
- 6.15 As a result of the representations received, the Council prepared Focused Proposed Changes in August 2009 and, following the pre-hearing meeting of the LDP Examination, Further Focused Proposed Changes in October 2009. These were screened by Enfusion and it was found that most of the changes were minor in nature, and most were matters of clarification or the addition of detail to the text supporting the plan policies. Details of SA screening and appraisal are presented separately in Appendix 9.
- 6.9 Four changes were considered to have potentially significant effects:
- Removal of Policy BW9: Energy and Climate Change
 - Change in employment land from 40 to 30 hectares in Policy BW14

- Significant reduction in affordable housing provisions with change from Policy TB4 to AS22
 - New policy BW18: Contaminated Land
- 6.16 Removal of Policy BW9: Energy and Climate Change. This was removed to reflect national policy changes that provide stronger measures on energy and climate change. As the LDP is required to conform to higher level guidance, Policy BW9 is now superseded. Despite removal of this policy, the SA found that the overall effect on sustainability will be improved as a result of the robust approach being taken to energy efficiency at the national level.
- 6.17 Change in employment land from 40 to 30 ha in Policy BW14. This policy was amended to ensure consistency with employment targets for the wider region, the economic situation and the realities of employment provision in the South East Wales region. The changes are considered to reflect a more deliverable and viable target and were therefore supported by the SA.
- 6.12 Significant reduction in affordable housing provisions with change from Policy TB4 (950 homes) to AS22 (370 homes). The SA acknowledged that policy changes were based on updated information. The SA found that the overall sustainability remained the same since the new policy is reflective of the level of affordable housing that is deliverable. However, the SA recommended that affordable housing should be monitored to reassess the situation as the LDP is implemented.
- 6.13 New policy BW18: Contaminated Land. The SA determined that whilst this is a complex issue, the policy will generally contribute to the sustainability of the LDP by providing a clear policy framework for the redevelopment of contaminated land.

SA (2) of Development Proposals by Merthyr Village Ltd (MVL) (May 2009)

- 6.14 As a result of consultation on the Preferred Strategy, the Deposit LDP excluded the large site 200 ha to the west of Rhydycar. Representations were received from MVL during the consultation on the Deposit Plan objecting to the omission of the site and the accompanying SA findings. Accordingly, the Council commissioned an updated independent detailed appraisal of the development proposals now being suggested by MVL. The SA considered additional information available since the original SA carried out in 2007. Details are presented separately in Appendix 10.
- 6.15 The SA identified that effects on sustainability objectives associated with transport, built environment, water, climate change, energy, waste and minerals, could be addressed through the detailed design of site layout, public transport improvements, building construction techniques and the use of renewable energy and water technologies.

However, the SA found that major adverse effects were likely on cultural heritage, landscape, land/soils, and biodiversity – and their inter-relationships.

- 6.16 The SA identified that the proposals would likely have significant adverse effects which would be very difficult or not possible to mitigate. The site contains considerable cultural heritage including national protected sites and is nearly totally covered by a protected SSSI designation. The landscape is of value and the area is a unique part of the industrial history of Wales. Areas of the site have national biodiversity protection through designation as UKBAP priority habitats and provide habitats for several nationally protected species. The SA also recognised that there is an issue over the stability of the site that needs to be addressed to ensure public safety.
- 6.17 Overall, the SA concluded that development of the proposed site would cause irreversible adverse environmental effects. It was noted that although the proposals perform reasonably well against socio-economic objectives, so does the Spatial Strategy put forward in the Deposit LDP. This further SA study confirmed the earlier SA findings and the Adopted Plan does not include a 200 ha site to the west of Rhydycar.

Comparative Strategic Sustainability Appraisal (SSA) of Enhanced Growth Strategy (February 2010)

- 6.18 At Examination, the Inspector requested a new comparative strategic sustainability appraisal of the proposed Spatial Strategy – including and excluding the 200 ha site to the west of Rhydycar. The SSA was able to take into account additional information available since 2006 when the original strategic alternatives assessment had been carried out. The comparative SSA sought to be reasonable and aimed to comment on any significant issues that might differentiate the two alternatives, recognising that many of the factors are the same. The SSA also drew attention to any factors that might have changed and affected both options as a result of major policy changes, for example, adoption of the Code for Sustainable Homes in Wales and publication of draft River Basin Management Plans. Details are presented separately in Appendix 11.
- 6.19 The comparative SSA found that the two options were similar with regard to the sustainability objectives for cultural heritage, transport, the built environment, landscape, climate change, energy, waste and minerals. Whilst both options indicated very significant beneficial effects with regard to housing, communities, economy and employment, the strategy without the 200 ha site was found to offer additional benefits.
- 6.20 For housing, in the Rhydycar West scenario, half of the required housing growth would be reliant on the development and delivery of one major site. The SA found that the other option offered more flexibility to

produce housing of all types across the plan period; affordable housing is required immediately. The scenario excluding Rhydycar West was shown by the SA to provide new employment land and retail opportunities that support, rather than undermine, the established retail areas.

- 6.21 The scenario excluding Rhydycar West was identified by the SA as being easier to achieve social and physical integration with existing communities – rather than trying to integrate an almost self-sufficient development with no easy or direct links to the town centre. However, it was noted by the SA that it would be more difficult to obtain community benefits such as health and recreation from a range of smaller developments due to economic viability. Nonetheless, community benefit would not be dependent upon the success of one site, nor focused on one section of the town.
- 6.22 With regard to land and soils, the scenario excluding Rhydycar West means that greater advantage can be taken of previously developed land and maximising development density, rather than the option for urban expansion. The SA noted that the use of smaller sites in urban areas that are away from floodplains does reduce the potential adverse effects on flood risk. However, the main differentiator for the two spatial strategy options is the effect on biodiversity. Most of the 200 ha site at Rhydycar West has been confirmed as a SSSI since the original SA. The alternative spatial strategy excluding this large site offers a wider choice of locations for development and more potential for avoiding or mitigating adverse effects on biodiversity. The comparative SSA confirmed that the scenario with the 200 ha site at Rhydycar West did not progress sustainability objectives as positively as the alternative without the large site. It also showed that the scenario without the site is likely to have less significant adverse environmental effects.

SA of Proposed Changes arising from LDP Examination (July & December 2010)

- 6.23 Following the suspension of the LDP Examination in March 2010, the Council prepared policy changes in response to a programme of additional work agreed with the Planning Inspector. Policy changes were proposed by way of three separate volumes in March, May and July 2010 with each volume being subject to SA screening as set out below. All volumes were offered for public consultation in a single consultation exercise at the end of the Examination suspension period in July 2010.

SA of Proposed Changes arising from the Programme of Further Work Volume 1 - March 2010

- 6.24 In March 2010, each proposed change was screened to identify whether it was likely to cause significant sustainability effects. It was found that most of the changes were minor in nature and/or provided

clarification of policies/supporting text, or made changes that improved the overall sustainability of policies. Although Policy BW5 on landscape and biodiversity was completely rewritten, the predicted effects are not significantly different and represent an improvement on the sustainability of the policy. Details are presented separately in Appendix 12.

*SA of Proposed Changes arising from the Programme of Further Work
Volume 2 - May 2010*

- 6.25 In May 2010, each proposed change was screened to identify whether it was likely to cause significant sustainability effects. It was found that most of the changes were minor in nature and/or provided clarification of policies/supporting text, or made changes that improved the overall sustainability of policies. One policy (AS23) was considered to be significant with regard to SA due to the inclusion of land for employment, waste and minerals uses in conjunction with the proposal to increase use of the Cwmbargoed railhead. The SA found that beneficial effects were predicted for most SA objectives through the encouragement and facilitation of rail rather than road freight movements. Indirect adverse effects were indicated for the use of coal as an energy source; however, it was acknowledged that coal does present a secure local energy source. Details are presented separately in Appendix 13.

*SA of Proposed Changes arising from the Programme of Further Work
Volume 3 - July 2010*

- 6.26 28 policy changes were screened for SA in July 2010 and details are presented separately in Appendix 14. It was found that most of the changes were minor in nature and/or provided clarification of policies/supporting text, or made changes that improved the overall sustainability of the policies.
- 6.27 Policy AS24 Employment Site Protection and Policy TB13 Exception Sites for Affordable Housing are new policies and as such were subject to detailed appraisal. For Policy AS24, the SA did not identify any adverse effects and found that beneficial effects were likely for most sustainability objectives through the protection and retention of existing employment premises and the potential to achieve a wide range of employment opportunities.
- 6.28 For Policy TB13 Exception Sites for Affordable Housing, the SA found that beneficial effects are likely for sustainability objectives relating to housing, health and communities with potential indirect benefits for employment objectives. Whilst some adverse effects were identified with regard to transport, landscape and biodiversity objectives, the anticipated level of development will be small and some mitigation will be possible. Therefore, these effects were not considered to be significant and the overall effects were found to be neutral.

- 6.29 On completion of the aforementioned suspension period in August 2010, the LDP Examination resumed. At the end of the hearing sessions held in October 2010, further changes to some policies were considered necessary by the Inspector. Such changes were subsequently proposed by the Council and were subject to SA screening as outlined below before being offered for public consultation in December 2010.

SA of Further Proposed Changes following the October 2010 Examination Hearing Sessions, December 2010

- 6.30 Further changes to some policies were proposed, generally, to update or improve justification to reflect current information. These changes were screened for SA and reported in December 2010; details are provided separately in Appendix 15. For those policies with changes to wording, the SA found that the predicted effects were not significantly different from the original policies. They generally represent an improvement, with no significant adverse effects identified, of either the individual policies or the overall sustainability of the LDP.

7.0 IMPLEMENTATION AND MONITORING

Introduction

- 7.1 This section outlines potential indicators and targets to help monitor the sustainability effects of the LDP as identified through the SA/SEA process. Possible targets and/or indicators for each sustainability objective have been identified (from the SA Framework) to provide a suggested list for discussion. These indicators, which have been iteratively developed by the Council, reflect those proposed in the scoping report (April 2006) but they also take into account the subsequent development of the SA Framework in June 2006 following consultation with key stakeholders.
- 7.2 No comments on the SA monitoring proposals were received during the public consultation on the Deposit LDP and accompanying SA Report 30 October – 12 December 2008. The SA of the proposed changes to the LDP recommended that the Council should ensure that affordable housing needs is monitored closely to reassess the situation as the LDP is implemented. The Council will continue to develop an Integrated Monitoring Strategy for the SA as part of the requirements for the Council's Annual Monitoring Reporting (AMR).

SA Monitoring Proposals for Local Development Plan

- 7.3 The Strategic Environmental Assessment Directive requires that the significant environmental effects of implementing a plan or programme are monitored in order to identify unforeseen adverse effects and if necessary, to identify the need for remedial action. Government also requires local planning authorities to produce Annual Monitoring Reports to track the progress of Local Development Document implementation. According to official guidance, 'These need to include the findings of SA monitoring'⁹. Therefore, the monitoring strategy for the SA/SEA should aim to be integrated with the Local Development Framework Annual Monitoring Report
- 7.4 The proposed monitoring strategy for the SA/SEA, as set out below, should:
- Clearly set out who is responsible for the monitoring, as well as its timing, frequency and format for presenting results;
 - Provide for the collection of new information, thereby updating and strengthening original baseline data, rectifying any deficiencies, and providing an improved basis for the formulation of future plans;
 - Establish a mechanism for action to enhance positive effects of the plan, mitigate any negative ones and assess any areas that were originally identified as containing uncertainty. The aim

⁹ *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* ODPM, November 2005

should be to keep the LDP working at maximum effectiveness for the benefit of the community; and,

- Support wider community engagement by providing a clear and easily understandable picture of how actual implementation of the LDP is affecting the authority areas. Is it moving the area towards or away from the more sustainable future we intended? Are any significant effects identified actually happening? Are any unforeseen consequences being felt? Are any mitigation measures that were proposed operating effectively?

7.5 Indicators seek to measure all relevant aspects of the areas addressed by the SA/SEA - social and economic as well as environmental and they are drawn from:

- Objectives and targets set out in the LDP – some of which are quantitative and may be expressed as maps, graphs, diagrams or percentages (e.g. Percentage of new housing built on brownfield land, target of 10% of energy on major new developments to be provided by renewables etc.);
- Indicators already identified and used in the SA process,
- Measures drawn from the baseline data collected during the early stages of the LDP or from the previous Local Plan (e.g. air quality, extent of wildlife habitats, need for affordable housing); and,
- Measures suggested by the community which are typically more qualitative (e.g. quality of life) and could be useful in enriching understanding and giving people a sense of ownership of the LDP.

7.6 Sustainability targets and indicators have also been sourced from the Welsh Assembly Government, with particular reference to the Wales Spatial Plan Update and the Sustainable Development Indicators for Wales (2008) which link to the UK indicators produced nationally by Defra. The indicators therefore reflect the sustainable development aims and priorities for Wales whilst ensuring consistency with the UK sustainable development framework. It is essential to select a meaningful number of indicators that are appropriate for the monitoring strategy from the following table of possibilities:

Table: 7.1 Potential SA Targets and Indicators

1 Housing (Topic Area in SEA Directive: Population and Human Health)						
SA Objective	Relevant LDP Policies	SA Targets	SA Indicators	Sources of information	Information Update	
<p>Meet the overall housing requirement through a mix of dwelling types catering for all needs to promote integrated and thriving communities</p> <p><u>Decision aiding questions (Will the policy or plan...?)</u></p> <ul style="list-style-type: none"> ■ Ensure the allocation of sufficient and appropriate land to meet the housing need ■ Help deliver good quality housing ■ Promote a mix of housing size, type and tenure within each settlement 	BW 13 BW 17 AS 1 AS 2 AS 3 TB 4 TB 5 TB 6	Reduce discrepancies between housing requirement, especially for affordable and special needs housing, and stock	Annual provision of affordable or special needs housing	Town Planning Division	Annually	
			Average house price compared with average earnings	Neighbourhood Statistics; Land Registry ; Up my street	Annually	
			Proportion of households unable to purchase a property	Town Planning Division	Annually	
			Population structure	Mid Year Population Estimate, Statistics Wales	Annually	
			Proportion of housing that meets WHQS	Housing Division	Annually	
			Percentage of empty homes in the County Borough	Housing Division	Annually	

	<ul style="list-style-type: none"> ■ Promote housing that meets the requirements of those with special needs ■ Help meet affordable housing needs to allow local people to remain within communities ■ Protect and enhance the existing traditional housing stock including the characteristic terraces where appropriate 			Number of unfit homes per 1,000 dwellings	Welsh House Condition Survey; Neighbourhood Statistics	
2	Cultural Heritage (Topic Area in SEA Directive: Cultural Heritage)					
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update
	Promote and protect Welsh Culture and Heritage including landscape and archaeology <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> ■ Protect and enhance areas and buildings of historical, archaeological or cultural importance including the historic landscape whether protected by legislation or not ■ Promote, protect and enhance the industrial heritage ■ Promote sustainable access to 	BW 6 BW 7 AS 4	Increase proportion of new development that protects or enhances sites of historical and cultural interest	Proportion of archaeological sites, ancient monuments, listed buildings and conservation areas adversely affected by development proposals	Town Planning Division	Annually
Proportion of the Historic Landscape and Historic Parks and Gardens adversely affected by development proposals				Town Planning Division	Annually	
Positive or negative change in the Buildings at Risk Register				Housing Division	Annually	

	cultural and historic sites			Condition of scheduled ancient monuments	Town Planning Division; Cadw	Annually
	<ul style="list-style-type: none"> Support the Welsh language 			Proportion of Conservation Areas with an up to date character appraisal	Town Planning Division	Annually
				Percentage of residents who can speak Welsh	Statistics Wales	Annually
3	Communities (Topic Area in SEA Directive: Population)					
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update
	Encourage population retention and growth; and promote integrated and distinctive communities with opportunities for living, working and socialising for all <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> Encourage provision of local community facilities and employment opportunities in accessible locations Promote equality of access for all Assist in creating safer communities 	BW 1 BW 2 BW 3 BW 15 BW 17 TB 12 AS 21	All people to have access to a GP, post office, play area, pub and village hall Increase percentage of people with qualifications and improve skills	Percentage with access to a GP, post office, play area, pub, village hall	Town Planning Division	Annually
				Percentage with access to a daily bus service	Town Planning Division	Annually
				Distance to local services	Town Planning Division	Annually
				Differences in car ownership between wards	ONS Census	10 Yearly
				Number of adults attending adult and community learning courses	Adult Community Learning Service, MTCBC	Annually

			Reduce the number of wards that are among the 100 most deprived in Wales	Proportion of the population who live in wards that rank amongst the 100 most deprived in Wales	WIMD; Wales Social Justice Report	3 yearly		
4	Health (Topic Area in SEA Directive: Human Health)							
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update		
	<p>Promote services and facilities that encourage a healthy and safe lifestyle</p> <p><u>Decision aiding questions (Will the policy or plan...?)</u></p> <ul style="list-style-type: none"> ■ Promote provision of and access to healthcare facilities which are in accessible locations ■ Prevent air pollution, unacceptable levels of noise, light and odour and other pollution health risks in sensitive areas ■ Protect, promote access to and encourage provision of formal and informal open spaces, including allotments ■ Promote provision of facilities 	BW 11 BW 12 BW 16 BW 17 AS 15 AS 16 AS 17 AS 21	Increase access to physical recreation facilities	Achieving FIT Standards in recreation / play space provision	Parks Section; Town Planning Division	Annually		
Number of household within 400m of parks and open spaces				Parks Section; Town Planning Division	Annually			
Improvement in air quality				Public Health Department				
					Design to encourage walking and cycling	Km length of new cycle routes and footpaths created	Public Right of Way; Data Unit Wales	Annually
Proportion of residents who feel safe or fairly safe						Up my street; Home Office	Annually	
					Decrease in the number of people with limiting long term illness or general health 'not good'	Residents' description of their own health	ONS Census	5-10 yearly
			Proportion of residents who reported key illness, health-related lifestyle or service use	Stat Wales		Annually		

	for physical recreation and play			Death rates from circulatory disease, cancer, accidents and suicide	Stat Wales	Annually		
				Life expectancy	Stat Wales	Annually		
5	Economy and Employment (Topic Area in SEA Directive: Population, Material Assets and Human Health)							
	SA Objective	Relevant LDP Polices	SA Targets	Indicators	Sources of information	Information Update		
	Encourage a thriving and sustainable economy with a diverse range of job opportunities <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> ■ Ensure the allocation of sufficient and appropriate land to meet the economic and employment needs of the County Borough ■ Assist in the growth of localised economies within communities including support for neighbourhood retail facilities ■ Facilitate development to support, enhance and diversify the rural economy ■ Encourage sustainable tourism and leisure opportunities 	BW 14 AS 14 AS 18 AS 19 AS 20	Broaden economic base	Percentage of economic activity by sector	ONS Nomis Official Labour Market Statistics	Annually		
Gross Domestic Product or Gross Value Added as a percentage of the EU average				ONS Nomis Official Labour Market Statistics	Annually			
Distribution of workforce across sectors (percentages)				ONS Nomis Official Labour Market Statistics	Annually			
					Increase opportunities to work within the County Borough	Allocations that provide premises for a range of different employment needs	Town Planning Division	Annually
						Percentage of allocated employment land taken up	Town Planning Division	Annually
					Decrease unemployment	Percentage of resident working age population employed	ONS Nomis Official Labour Market Statistics	Annually

<ul style="list-style-type: none"> ■ Promote opportunities for starting small business ■ Promote a town centre that provides a range of retail, employment, residential, leisure and cultural opportunities. ■ Promote a diverse range of job opportunities for a variety of skills ■ Maximize employment opportunities and diversify employment structure ■ Promote jobs in accessible locations within the County Borough ■ Accommodate employment training facilities ■ Support a sustainable retail hierarchy that reinforces the viability of the town and neighbourhood centres ■ Encourage opportunities for home working 			Percentage of people living as well as working within the County Borough	ONS Census	10 yearly
			Household disposable income per capita	Neighbourhood Statistics	Annually
			Percentage of population of working age qualified to NVQ Level 4 or equivalent	ONS Nomis Official Labour Market Statistics	Annually
			Proportion of population without literacy, numeracy and IT skills	ONS Nomis Official Labour Market Statistics, Neighbourhood Statistics	Annually
			Percentage of population receiving benefits	Stat Wales, ONS Nomis	Annually
			Proportion of people claiming unemployment benefits who have been out of work for more than a year	Stat Wales	Annually
			Percentage of population with access to lifelong learning opportunities	Stat Wales	Annually
			Percentage of retail premises vacant in the town Centre	Town Planning Division	3-5 yearly

			Support rural economy	Percentage of farm diversification permitted	Town Planning Division	Annually
			Support potential funding to provide basic infrastructure, develop human resources, invest in research, innovation and the information society	Number and amount of funding received from European and External Fund	European & External Fund, MTCBC	3-5 yearly
6	Transport (Topic Area in SEA Directive: Population and Climatic Factors)					
	SA Objective	Relevant LDP Polices	SA Targets	Indicators	Sources of information	Information Update
	Assist in reducing the need to travel and promote more sustainable modes of transport <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> ■ Promote adequate alternatives to the private car and improve public transport links ■ Encourage better access to 	BW 7 BW 11 BW 12 BW 17 AS 9 AS 10 AS 11 AS 12 TB 12 TB 13	Promote more sustainable modes of transport	Percentage change in public transport use	Defra; ONS Census	10 yearly
			Locate new development in sustainable locations, reducing the need to travel	Number of public transport routes connecting service centres with residential areas	Town Planning Division	Annually
			Percentage of people travelling to work by car	ONS Census	10 yearly	

	<p>poorly served communities across the County Borough</p> <ul style="list-style-type: none"> ■ Encourage and protect safe and attractive walking and cycling routes ■ Optimise the use of car parking land in the town centre ■ Encourage the provision of park and ride schemes ■ Promote travel plans for new developments that are likely to have significant transport implications 			Km length of new cycle and walking routes created	Data Unit Wales; Rights of Way Section		
7	Built Environment (Topic Area in SEA Directive: Material Assets)						
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update	
	<p>Encourage a high quality built environment that promotes community pride</p> <p><u>Decision aiding questions (Will the policy or plan...?)</u></p> <ul style="list-style-type: none"> ■ Ensure high standards of design in all new development ■ Protect and enhance local character and distinctiveness whilst recognising the role of innovation in the built environment 	<p>BW 7 BW 17</p>	<p>Seek a high standard of design in all new development</p>	<p>Number of planning applications complying with Design Guidance</p>	<p>Town Planning Division</p>	<p>Annually</p>	
					<p>Energy and water efficiency of new buildings and developments</p>	<p>Town Planning Division</p>	<p>Annually</p>
				<p>Increase opportunities for community participation in design of new development</p>	<p>Percentage of non-household development accompanying by design and access statements</p>	<p>Town Planning Division</p>	<p>Annually</p>

	<ul style="list-style-type: none"> ■ Promote methods of sustainable construction ■ Promote environmentally sympathetic infrastructure for people and wildlife e.g. wildlife corridor creation / protection ■ Promote higher density development where appropriate 		Improve public spaces	Proportion of new developments delivering benefits for the public realm	Town Planning Division	Annually	
8	Landscape (Topic Area in SEA Directive: Landscape)						
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update	
	Facilitate the protection and enhancement of the countryside and landscape character <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> ■ Promote sustainable management and use of the landscape including its character, geology and ecological features ■ Protect and enhance existing landscapes ■ Promote opportunities for access to and enjoyment of the countryside 	BW 4 BW 5 BW 16 BW 17 AS 4 AS 5 TB 1 TB 2 TB 3	Achieve favourable conditions of nationally and locally important landscape designations	Percentage of land given to development in nationally and locally importance land	LANDMAP, CCW	Annually	
					Change in access to the countryside by means other than the car	Town Planning Division, Rights of Way Section	Annually
					Amount of new build within designated areas	Town Planning Division	Annually
					Number of incidents of fly tipping	Public Health Department	Annually
					Night Blight		
					Percentage of common land given to development	Town Planning Division	Annually

				Percentage of trees and woodlands lost due to development	Town Planning Division	Annually
9	Biodiversity (<i>Topic Area in SEA Directive: Biodiversity, Flora and Fauna</i>)					
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update
	<p>Protect and enhance the diversity and abundance of wildlife habitats and native species</p> <p><u>Decision aiding questions (Will the policy or plan...?)</u></p> <ul style="list-style-type: none"> ■ Protect and enhance wildlife habitats and species ■ Prevent habitat fragmentation and encourage habitat creation ■ Take a holistic view of ecosystems, rather than focusing on 'islands' of protected species ■ Protect and enhance the biodiversity within the water environment 	BW 5 AS 6 BW 17	Protect and enhance biodiversity Achieve an the improvement in water environment	Total area of Merthyr Tydfil Local Biodiversity Action Plan priority habitats	Town Planning Division	5-10 yearly
Net area of habitat loss as a result of development				Town Planning Division	Annually	
Percentage change in total areas of SINCs				Town Planning Division	5 -10 yearly	
Favourable conservation status of SSSIs				Town Planning Division	5 yearly	
Area of successfully eradicated non-native species				Town Planning Division	Annually	
Changes in populations of selected local characteristic species in the Merthyr Tydfil Local Biodiversity Action Plan				Town Planning Division	Annually	

				Proportion of new developments incorporating ecological mitigation	Town Planning Division	Annually		
				Length of linear habitats created, maintained or enhanced, which increase the connectivity of biodiversity habitats	Town Planning Division	Annually		
10	Water (Topic Area in SEA Directive: Water)							
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update		
	Ensure the protection and enhancement of the water environment <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> ■ Encourage riverside and water based recreational activities (e.g. angling, canoeing) ■ Help to reduce and/or avoid pollution to the water environment ■ Promote sustainable water management including promotion of the use of sustainable drainage systems 	BW 7 BW 8 BW 17	Improve water quality	River water quality (% of total classified river length complying with water quality objective (or of "good status"))	Environment Agency	Annually		
					Development within groundwater Source Protection Zones	Town Planning Division	Annually	
					Flood Risk to be mitigated or avoided	Amount of development within C1 and C2 as defined by TAN 15	Town Planning Division	Annually
					New development to incorporate sustainable drainage systems	Percentage of new developments with Sustainable Drainage Systems	Town Planning Division	Annually

	<ul style="list-style-type: none"> ■ Manage, reduce and avoid exacerbating flood risk ■ Protect groundwater sources ■ Prevent new development that will exacerbate current foul drainage problems ■ Encourage the provision of adequate sewerage infrastructure in new development 		Encourage more efficient water use	Number of water efficient developments	Town Planning Division	Annually
				Water consumption per household	Dwr Cymru Welsh Water	Annually
11	Climate Change (<i>Topic Area in SEA Directive: Climatic Factors</i>)					
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update
	Help to minimise the cause and effects of climate change <u>Decision aiding questions (Will the policy or plan...?)</u>	BW 9 BW 17	Decrease greenhouse gas emissions	Emissions of greenhouse gases	WAG; National Atmospheric Emissions Inventory	?
Ecological footprint of Merthyr Tydfil				Stockholm Environment Institute	?	
Number of planning application submitted with Energy Design Statement				Town Planning Division	Annually	
<ul style="list-style-type: none"> ■ Encourage the provision of habitat routes to allow species to adapt to the changing environment ■ Help reduce greenhouse gas emissions ■ Reduce flood risk to people and property, and maintain integrity of floodplain 			Decrease impacts from the effects of Climate Change	Number of properties at risk from flooding	Environment Agency Wales	Annually
				Number of flood incidents	Environment Agency Wales	Annually
12	Energy (<i>Topic Area in SEA Directive: Climatic Factors and Air</i>)					

	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update			
	Encourage the supply of renewable energy and a reduction in energy consumption <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> ■ Promote energy efficiency ■ Encourage the development of appropriate renewable energy schemes ■ Encourage high standards of energy efficiency design in new development 	BW 17 TB 7 TB 9	Encourage efficient design in development	Proportion of developments and buildings meeting BREEAM	Town Planning Division	Annually			
				Proportion of new homes that achieving Code of Sustainable Home	Town Planning Division	Annually			
				Energy consumption	DTI Energy Statistics	Annually			
						Maximise the use of renewable energy	Megawatts of energy generated from renewable sources	Town Planning Division; Energy Officer	Annually
							Proportion of energy needs being met from renewable sources	Town Planning Division	Annually
13	Land and Soils (Topic Area in SEA Directive: Soil)								
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update			
	Promote efficient use of land and soils <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> ■ Encourage safe and suitable restoration of appropriate previously developed land 	AS 1 AS 2 AS 3 BW 4 TB 1 TB 2 TB 3	Percentage of development on previously developed land	Provision of new housing on previously developed land where appropriate	Town Planning Division	Annually			
				Overall density of residential development	Town Planning Division	Annually			
			Decrease percentage of contaminated land	Percentage of contaminated land remediated	Town Planning Division	Annually			

	<ul style="list-style-type: none"> ■ Prioritise the reuse of previously developed land and buildings particularly those in accessible locations ■ Optimise the use of Brownfield land ■ Help prevent pollution to land and soils 			Extent of non-permeable surfaces	Town Planning Division	Annually
14	Waste (Topic Area in SEA Directive: Water, Soil, Human Health and Population)					
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update
	Promote the minimisation of waste, especially waste to landfill <u>Decision aiding questions (Will the policy or plan...?)</u> <ul style="list-style-type: none"> ■ Identify sites to assist in efficient and sustainable waste management ■ Encourage the re-use of materials ■ Assist improvement in recycling performance by promoting the provision of appropriate domestic and commercial facilities ■ Support development of alternatives to landfill, including composting facilities and energy from waste 	AS 7 AS 8 TB 10	Move waste up the waste hierarchy	Recycling rate	Environmental Services, Data Unit Wales, Statistics Wales	Annually
Municipal waste recovery				Environmental Services, Data Unit Wales, Statistics Wales	Annually	
Access to Household Recycling Schemes / Recycling Banks				Environmental Services, Data Unit Wales, Statistics Wales	Annually	
Waste per household				Environmental Services, Data Unit Wales, Statistics Wales	Annually	
Waste imports/exports Quantity of commercial waste produced, recycled, landfill etc				Environmental Services, Data Unit Wales, Statistics Wales	Annually	
Reduce tonnage of waste to landfill			Tonnage of household waste to landfill	Environmental Services, Data Unit Wales, Statistics Wales	Annually	

15	Minerals (Topic Area in SEA Directive: Population and Climatic Factors)					
	SA Objective	Relevant LDP Policies	SA Targets	Indicators	Sources of information	Information Update
	<p>Promote efficient and appropriate extraction and use of minerals in a manner that minimises social and environmental impacts</p> <p><u>Decision aiding questions (Will the policy or plan...?)</u></p> <ul style="list-style-type: none"> ■ Safeguard identified mineral resources ■ Promote efficient extraction of identified minerals where there is need ■ Ensure mineral extraction has minimal social and environmental impacts ■ Promote the reuse and recycling of aggregates on demolition, construction and excavation sites 	BW 10 TB 8 TB 9	Increase percentage use of aggregates from secondary and recycled sources	<p>Development within defined minerals buffer zone</p> <p>Percentage of land has taken up by sensitive development</p>	Town Planning Division	Annually

Appendix 1: Statement on Compliance with the SEA Directive & Regulations

- 1.1 *An outline of the contents, main objectives of the plan and relationship with other relevant plans:*
- Section 1 of this SA Report sets out the contents and main objectives of the Adopted Plan. The relationship with other relevant plans is summarised in Section 3 and Appendix 3 of this report.
- 1.2 *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan:*
- Section 3 of this SA Report summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the Merthyr Tydfil area. Appendix 4 sets out this information in more detail. The likely evolution of current conditions ('trends') is detailed in Appendix 4 where available.
- 1.3 *The environmental characteristics of areas likely to be significantly affected:*
- Where relevant and available, information regarding particular areas has been included in Appendix 4.
- 1.4 *Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance:*
- Section 3 of this SA Report summarises existing sustainability problems (including environmental problems) for the Merthyr Tydfil County Borough Council area.
- 1.5 *The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation:*
- Appendix 3 of this SA Report provides the summary of objectives for sustainability in the Merthyr Tydfil area (including environmental objectives), and the implications of these objectives for the LDP.
- 1.6 *The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should*

include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects:

- The SA Framework of objectives presented in Section 3 of this SA Report shows which of the issues listed by the SEA Regulations are progressed by which SA Objectives. This assures that all of the issues are considered during the assessment of each part of the Plan, since each policy is assessed against each SA Objective.
- The likely sustainability effects of implementing the Plan (including environmental effects) are summarised in Sections 5 and 6 of this Final SA Report, and detailed in Appendices 5 -15. Where possible, an indication of whether effects are likely to be cumulative, short, medium and long-term etc has been included.

1.7 *The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan:*

- Where significant adverse effects, including environmental effects, have been predicted, the SA has sought where possible to identify means of offsetting these effects. These are provided in the form of recommendations in the appraisal matrices (Appendices 5-15) and summarised in Sections 4, 5 and 6 of this SA Report.

1.8 *An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information:*

- Justification for the different options considered for the Plan is provided alongside the matrix based assessment of options in Section 4 of this Report. Details of how the assessment was undertaken are provided in Section 2 of this SA Report (appraisal methodology), and difficulties encountered in compiling information are summarised in Section 3 of this Report. Further information on alternatives (sites and strategic spatial strategy) and reasons for rejection/progression is provided in Section 6.

1.9 *A description of the measures envisaged concerning monitoring:*

- Measures envisaged concerning the monitoring of the sustainability effects (including environmental effects) of implementing the Adopted Plan are provided in Section 7 of this report.

- I.10 *A non-technical summary of the information provided under the above headings - the Non-Technical Summary is set out at the beginning of this report.*