

Sustainability Appraisal Scoping Report and the Initial HRA Screening Report– Summary of Key Issues Raised

The Draft Sustainability Appraisal Scoping Report and the Initial HRA Screening Report was subject to a 5 week stakeholder consultation period commencing 23rd July 2018 until 27th August 2018.

The LPA received 9 consultation responses. A summary of the key issues raised in relation to the reports is provided in the table below:

Consultee	Summary of Comments	BCBC Response
Natural Resources Wales (NRW)	Noted the proposal to incorporate SEA within SA	Noted. Having reviewed all SA Scoping consultation responses, BCBC has now proceeded to prepare a formal SEA Screening Determination. This confirms that a statutory SEA will be incorporated within the wider SA of the LDP Review.
	Advised that NRW are satisfied with the proposed scope of the SA, noting that the proposed assessment methodologies are reasonable and the proposed SA objectives should enable a robust assessment of environmental impacts. NRW also noted that the existing environmental problems and likely environmental effects from the LDP Review have been identified.	Noted and welcomed.
	Advised that the SA/SEA should be a live document.	The SA, incorporating SEA, will be updated as a live document (or linked series of reports) throughout the LDP Review
	Identified additional key sustainability issues which should be incorporated into Table 4.1 of the SA Scoping Report and taken account of within the LDP Review and associated SA.	The identified additional issues have been added to Table 4.1 and will be taken account of.
	Identified additional points of relevance to the review of the exiting (2013) Bridgend LDP SA Framework.	The review of the exiting (2013) Bridgend LDP SA Framework provided in Table 5.1 was included only to confirm whether a new SA Framework would be needed for the LDP Review (as is the case) or whether the existing SA Framework remained fit for purpose. No changes are considered necessary to Table 5.1, although a reference has been added to the need for the SA Framework to consider the importance of ecological resilience,

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	Suggested two minor clarifications within Guide Questions supporting the proposed Biodiversity and Cultural Heritage SA Objectives.	<p>habitat connectivity and the duties imposed by the Environment (Wales) Act 2016.</p> <p>These clarifications have been added to the SA Framework presented in Table 5.4.</p>
	Identified other minor considerations and likely changes to existing policy guidance during the LDP Review which should be taken account of.	Noted. The reviews of baseline conditions and of other relevant plans and policies presented in Appendices A and B of the SA Scoping Report will be kept up to date and will be appended to each iterative SA Report which accompanies substantive consultation documents, i.e. the LDP Pre-Deposit and LDP Deposit Documents.
Cadw	Welcomed the inclusion of historic environment as a new cultural heritage SA Objective in its own right. Further advised that the proposed wording of the cultural heritage SA Objective is adequate.	Noted and welcomed.
	Recommended that the suite of Guide Questions supporting the cultural heritage SA Objective be rationalised and simplified in order to enhance their clarity. Suggested three replacement Guide Questions to address this.	Agreed. The suggested three replacement Guide Questions have been included within the SA Framework presented in Table 5.4.
	Recommended revised wording to one proposed Candidate Site Assessment Criteria, including the addition of a reference to archaeological sites.	The relevant Candidate Site Assessment Criteria has been amended to reflect the issue raised by Cadw and now includes reference to important archaeological sites.
	Advised of changes which should be made to the review of other relevant plans and policies provided in Appendix B for reasons of accuracy.	All of these requested changes have been made within Table B.1.
Welsh Assembly Government	Advised that the Welsh Assembly Government has adopted a policy position of not providing responses to SA/SEA consultations.	Noted.

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Glamorgan Gwent Archaeological Trust	Welcomed the identification of the historic environment as a key sustainability issue of relevance to the LDP Review. Provided guidance regarding the national (Welsh) policy framework within which likely effects on the historic environment should be considered.	Noted.
Home Builders Federation (HBF) Wales	This response largely related to BCBC's Draft Candidate Sites Form rather than the SA Scoping Report.	BCBC have prepared a separate response to comments received regarding the Draft Candidate Sites Form. Of note, BCBC have waited until the conclusion of the SA Scoping process before commencing the Replacement LDP 'Call for Sites' consultation in order to provide maximum clarity and transparency regarding the sustainability issues against which all submitted candidate sites will be assessed.
South-Wales Police: Designing out Crime Officer	No comment.	Noted.
Merthyr Mawr Community Council	Generally supported the suite of SA Objectives identified to underpin the SA, incorporating SEA, of the LDP Review.	Noted and welcomed.
	Queried whether the dunes at Merthyr Mawr are included in the Kenfig / Cynffig SAC and SSSI.	Yes, the dunes are included in this area.
Pencoed Town Council	Concerned over the consultation arrangements.	<p>In response to Pencoed Town Council's concerns regarding the consultation, it is important to note that the Replacement Local Development Plan - Delivery Agreement was approved by Council on 20th June 2018 and sets out how and when the local community and other stakeholders can contribute to the preparation of the Replacement Plan and a timetable for its preparation.</p> <p>In accordance with the SEA Regulations, the SA Scoping Report was submitted to the statutory SEA Consultation Bodies (Welsh Government, Natural Resources Wales and Cadw) (as prescribed within the SEA Regulations themselves) and made available for consultation by other stakeholders from 16th July – 27th August</p>

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		<p>2018. This consultation period exceeded the 5-week consultation period required by the SEA Regulations. BCBC have now taken account of all responses received from both the statutory SEA Consultation Bodies and all other stakeholders who submitted responses, including the response from Pencoed Town Council.</p> <p>For information purposes, the LPA would not normally consult with Town and Community Councils on these documents, however, in response to feedback received from the Town and Community Council Forum regarding greater involvement in the Replacement LDP process, Town and Community Councils were notified in writing about the consultation period and how to respond.</p> <p>It is acknowledged that it may have been challenging for Pencoed Town Council to respond to this consultation during the statutory 5 week consultation period (especially as it fell over the summer recess). However, it is important to emphasise that the Replacement Local Development Plan has to be prepared to a very tight timescale (as required by the Welsh Government). Re-scheduling the consultation to avoid the summer recess would have resulted in a significant delay to the overall Replacement LDP timetable. It is your Officer's opinion that while the Sustainability Appraisal (SA) Scoping Report and Initial Habitat Regulations Appraisal (HRA) Screening Report consultation is an important statutory stage in the Replacement LDP process, it is the 'Call for sites', 'Pre-deposit' and 'Deposit' consultation stages where it will be essential for Town and community Councils to engage in accordance with the approved Delivery Agreement.</p> <p>The Development Planning Section will continue to provide regular updates on the Replacement LDP process to the Town and Community Council Forum.</p>
	<p>Noted that the SA Scoping Report makes no mention of the need to remove the Rail Crossing and upgrade the Penprysg Bridge in Pencoed.</p>	<p>In response to Pencoed Town Councils concern that the SA Scoping Report makes no mention of the need to remove the Rail Crossing and upgrade the Penprysg Bridge in Pencoed. These</p>

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		<p>detailed and site specific matters are not considered to fall directly within the scope of the SA at this stage. The purpose of the SA is to undertake a high level assessment of likely significant effects from the LDP Review, no substantive components of which (whether relating to transport infrastructure or other matters) have yet been developed or consulted on.</p> <p>In due course, the SA will undertake a proportionate assessment of all substantive components within an emerging Replacement LDP for the BCBC area, including any rail infrastructure proposals and associated policies. The suite of SA Objectives, Guide Questions and Candidate Site Assessment Criteria set out within Table 5.4 of this SA Scoping Report (including specific SA Objectives covering population, human health, air quality and material assets, i.e. infrastructure) will be used to undertake this SA.</p> <p>Each substantive consultation document regarding the emerging Replacement LDP (i.e. the LDP Pre-Deposit Documents and the LDP Deposit Documents) will be subject to SA. SA Reports documenting the findings of this will published for consultation in tandem with each substantive consultation document.</p>
Caerphilly County Borough Council	Caerphilly CBC has no observations to make.	Comments noted.