

Caerphilly LDP

Reg15 Pre-Deposit Consultation: Welsh Assembly Government Response

(We note that a self-assessment based on the soundness tests is provided at Preferred Strategy Appendices section 11)

P1 - Prepared in accordance with the Delivery Agreement including the CIS	
Comments	Suggested Actions
We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case.	N/A

P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)	
Comments	Suggested Actions
<p>We note that:</p> <ul style="list-style-type: none"> - Para 1.3 of the Preferred Strategy document advises that the Preferred and Alternative Strategies have been subject to SEA/SA assessment and the Preferred Strategy is not the most sustainable though it has been modified (Section 9 of the document). Mitigation depends heavily on Policies SP1 And SP8. - Section 9 advises that Part 1of the SEA/SA process (up to Reg 15 publication) comprises 3 documents (all provided as part of the Reg 15 consultation). Doc1: The Scoping Report reviews the main environmental issues for each topic area, develops these into 25 sustainability objectives in relation to the 4 community Plan themes, each the objectives has a number of draft indicators to be used for monitoring the SEA/SA. Doc2: The Review of Relevant Plans, Programmes and Policies, and Doc3: The Assessment of the Preferred and Alternative LDP Strategies gives 20 assessment tests (for this strategic level) against which the strategies are assessed in workshop sessions with the Sustainability Group. - Para 2.7 of the Doc1: Scoping Report - the LDP Manual provides guidance on SEA/SA. 	<p>Strengthen the justification for the policy decision in Section 9 using evidence to support it.</p> <p>See comments below on SP1 and SP8.</p>

<p>Appropriate assessment: Doc1 Scoping Report, at para 1.1, & 4.17ff, refers to the need to undertake a Habitats Directive Appropriate Assessment in conjunction with the SA; (Aberbargoed Grasslands + 3 other sites outside the plan area – Bristol Channel Marine SPA & possible SAC + RAMSAR, Cardiff Beech Woods, Cwm Clydach Woodlands). The self-assessment based on soundness tests at Preferred Strategy appendices section 11 fails to refer to whether there has been Appropriate Assessment Screening. The Preferred Strategy should have undergone the first stage of the HRA assessment in discussion with CCW.</p>	<p>Ensure the Preferred Strategy and the alternative options have been tested under the Habitats Regulations.</p>
<p>We note that the SA Document 2 identifies the Assembly policy publications Farming for the Future and a Working Countryside for Wales, with support for improving the competitiveness of agriculture, including the need to meet modern animal welfare standards and environmental safeguards, and the importance of off farm and diversified income to allow farming families to continue to fulfill their valued role in the countryside. SA Document 3, Appendix 2 Assessment Test no. 14 Soil quality/ quantity and permeability demonstrates that the Preferred Strategy performs well in this regard.</p> <p>The SEA Scoping Report contains strong baseline data and sustainability objectives and indicators for the Cultural Environment. In its assessment of the implications for the LDP of Planning Policy Wales it also concludes that “The LDP must set out policy to preserve and enhance the historic environment...”</p> <p>Energy Wales has serious concerns about the plan because it does not acknowledge the importance of exploitable coal reserves that are close to the surface.</p> <p>Appendix 12 and the mitigation identified to the preferred strategy contains insufficient response to the SA issues of mineral resources, flood risk and waste raised by the appraisal process and this is reflected in the preferred Strategy.</p>	<p>Energy Wales are disappointed the Coal Authority were not included in the consultation (they were forwarded the draft by Energy Wales). Please amend consultation processes.</p> <p>Reconsider preferred strategy mitigation and strategic policy.</p>

C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.	
Comments	Suggested Actions
<p>We note that sections 2 & 3 of the preferred strategy provides the national, regional and strategic context for the LDP and refers to a number of the key relevant plans, policies and strategies: WSP, area WSP, Strategy for the Heads of the Valleys (HOV), <i>Turning Heads</i>, SEWSPG housing apportionment, proposed Regional Transport Plan, SEW Regional Waste Plan, SW Regional Technical Statement for Aggregates, Community Strategy Community Planning in Action '04; Local Partnership Strategies – env, Regeneration, health etc, education, Employment Sites appraisal, proposed Local Housing Mkt Assessment).</p> <p>The SEA/SA Part 1 Doc 2 also contains the review of Relevant Plans, Policies & Programmes.</p>	
<p>Wales Spatial Plan (See C3 below) The strategy promotes balanced growth as described in the Wales Spatial Plan for the South East and it is in-keeping with the objectives of the Heads of The Valleys (HOV) regeneration strategy.</p> <p>What is less clear is the impact of the inter-relationships between Caerphilly County Borough and adjoining areas. For example, it is clear that the southern part of the County including Caerphilly town, forms part of the greater Cardiff housing market. This results in a considerable amount of out-commuting from the southern part of the County Borough. Though there is some discussion in Section 6 of the functional inter-relationships with other areas, it is not clear if these have been adequately considered or quantified or that the strategies/aspirations of neighbouring authorities have been addressed (other than relying on initiatives underway as part of the Wales Spatial Plan area work).</p>	<p>Ensure that it is clear how the contextual strategies, including the WSP area work, and those strategies of neighbouring authorities, have influenced the preferred strategy. Take clear account of comments of adjacent authorities.</p>
<p>Para 2.28 of the preferred strategy refers to the Regional Technical Statement (RTS) as informing the safeguarding process for aggregates. Whilst this may be an element of the RTS, the RTS is intended to ensure an adequate, sustainable, supply of primary aggregates. It will set out the contribution to be made by Caerphilly to the identified aggregates demand and the requirement for landbanks (see para 17 of MPPW and paras 45-50 of MTAN1).</p>	<p>To take account in developing the deposit plan.</p>
<p>While the Preferred Strategy documents do refer to the Regional Waste Plan and the appendices provide the current information, the Preferred Strategy document does not interpret these into locally relevant strategic policies.</p>	<p>There should be a strategic policy to state how much additional capacity or additional waste sites will be</p>

	required in the County Borough within the Plan period.
<i>See also comments at Soundness Test CE1 & CE2.</i>	

C2 It has regard to national policy.	
Comments	Suggested Actions
<p>LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the Preferred Strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1). Instead many of them are bland policy statements that fail to build on national policy or relate to the preferred strategy (e.g. SP2, SP3, SP4, SP8).</p> <p>The preferred strategy and policies on minerals (coal and safeguarding) and waste do not meet the national requirements in PPW and MPPW and the relevant TANs as outlined in the detailed sections below.</p>	<p>Strategic Policies need to be redrafted for the deposit plan. Detail is provided in this Assembly Government response (particularly at soundness tests C1, CE1 & CE2)</p>
<i>See also comments at Soundness Tests CE1 & CE2</i>	

C3 It has regard to the Wales Spatial Plan	
Comments	Suggested Actions
<p>The preferred strategy aligns well with the emerging framework for strategic development in South Wales in terms of the roles and functions of hub settlements and the spatial sub sets- Heads of Valleys / connections corridor. Whilst the contribution to delivering the networked city region could be clearer, this is excused by the fact that consultation on this has not yet begun.</p>	

C4 - Has regard to the relevant community strategy/ies.	
Comments	Suggested Actions
Appears to do so; the overall vision appears to be well integrated with the Community Strategy (Section 3 of the Preferred Strategy document). Please advise if this is not the case.	

CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities & CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base	
Comments	Suggested Actions
<p>The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, what the plan vision is, what the plan objectives are, what strategic spatial options were considered and what the preferred spatial strategy is (see LDP Manual section 6.5). Not all these matters are absolutely clear as outlined below:</p> <ul style="list-style-type: none"> - Section 4 of the Preferred Strategy document refers to the “summary of key land-use issues” contained in the Preferred Strategy Appendices section 2. This “summary” list is 16 pages long and many of the issues bulleted are very general. It is not apparent that there is any subsequent analysis of this list of issues to provide a focussed small number of key critical land-use issues for the plan area that need to be dealt with by the LDP – this requires prioritisation and there should be clarity of how the strategy and subsequent full plan has been focussed to deliver on them. - The LDP vision (page 20) is clear, as is the process for arriving at it. - It is not at all clear as to what the plan objectives are. These are fundamental to the construction of a sound plan. Paragraph 5.5 says the LDP “will” outline a series of key objectives; Appendices Section 4 lists a total of 24 objectives for the LDP (i.e. those Community Strategy objectives with a land-use implication). Paragraph 6.99 refers to the “8 strands or objectives”, which para 6.4 and the sub-heading at para 6.17 had given as “components” or “themes” of/for the preferred strategy. 	<p>The deposit plan should be clear about the key critical land-use issues for the plan area that the LDP should deal with.</p> <p>The deposit plan should specify clear LDP objectives. (paras 2.10 & 2.11 of LDP Wales)</p> <p>Section 6.99 should be the starting</p>

<p>The setting of clear and SMART plan objectives is also critical for subsequent plan monitoring purposes.</p> <ul style="list-style-type: none"> - The strategic options and preferred strategy (section 6) appear to be broadly relevant to the area and are land-use. The overall summary of the spatial strategy (para 6.99) is very clear. - Section 6 is overly long and complex, with a confusing mix of description and policy. <p>- The link between the evidence base compiled as part of the SEA/SA, monitoring of SEA targets and the actual intent of the Preferred Strategy and the policies to deliver the preferred strategy is not always explicit, particularly in relation to environmental and infrastructure capacity.</p> <p>- Generally the strategic policies do not appear clear or specific enough to deliver on the narrative contained in the preferred approach. For example, what does criterion 5 mean in terms of the narrative and how will tensions be resolved? The narrative acknowledges priorities for areas and potential tensions but the policies do not shed light on how tensions will be resolved and what the priorities will be in particular areas.</p>	<p>point (with the key diagram) for the explanation of the preferred strategy and how it relates to the vision, the key issues and the chosen objectives.</p> <p>For clarity, make explicit where possible (see detail below).</p> <p>See detailed comments on policies below.</p>
<p>The Preferred Strategy of dividing the County into distinct zones would appear to be a continuation of the spatial strategy, which underpinned the Unitary Development Plan. The recognition that different parts of the County function in different ways, and that specific policies are required to address these areas is well accepted. There does not appear to be much evidence of clear internal consistency between the major drivers of change in the County. For example there is a lack of evidence regarding the adequacy of the population assumptions; this in turn casts uncertainty over the adequacy of the supply of land for housing; which in turn leads to ambiguity about the provision of affordable housing. The preferred strategy does not fully make the connections between housing, economic development, transport and regeneration issues.</p> <p>Policy SP1 is a set of objectives/themes and does not by itself lead to the implementation of the strategy. It repeats national policy and adds no local delivery mechanisms or local SA mitigation for the preferred strategy as identified in Appendix 9.</p> <p>Policy SP8 repeats national policy contrary to the PPW Companion Guide but could be related to SP10 in terms of defining the strategic policy approach to local accessibility issues and proposed development in the defined areas of change in the preferred strategy.</p> <p>Policy SP3 should be used as a strategic policy that sets out local areas of protection from change. See also comments below re historic conservation.</p>	<p>Ensure that there is evidenced consideration of these matters.</p> <p>Consider links between employment review, housing and commuting and make sure that there is internal consistency and adequate consideration of external relationships in the strategy.</p> <p>Consider paragraphs like 6.11 and develop policies that set out spatial distinctions in the approach to development for each area and type of settlement.</p> <p>Consider a strategic policy on delivering local accessibility and review SP3.</p>

<p>The SA Scoping Report (Geology and Soils) correctly identifies that the best agricultural soils lie in the south of the plan area, with a stated target of no loss of best and most versatile agricultural land. There is a good chance that this target is achievable.</p> <p>However, the relationship of the preferred strategy to the safeguarding of minerals resources is not sufficiently clear (see below).</p> <p>It is recognised that flooding has been taken into account and some flooding information may already exist but should the floodplain be a key area of implementation, its role in delivering strategy, should be clarified and be made explicit. Where the strategy relies on sites in the floodplain there may be a need to undertake some broad level assessment which provides for an understanding of flooding consequences to ensure that sites which are significant in terms of supporting the preferred strategy can be taken forward.</p> <p>National planning policy advocates that the implications of infrastructure capacity and/or requirements should be considered when identifying areas of growth. What is the current state of infrastructure capacity? How does the preferred strategy relate to public investment strategies such as water/sewerage/flood provision and protection infrastructure investment? What are the implications of the preferred strategy in terms of the level of investment required both now and in the future (over the lifetime of built development and the costs for the community in the longer term)? The strategy choice should encourage sites where provision exists and/or where problems can be solved and development can be phased. Therefore, the spatial implications of whether new provision is needed and whether, and how, it can be provided should be considered as part of arriving at (and providing justification for) the preferred option.</p> <p>Policy SP9 is too vague and should be used to rectify the local deficiencies identified above that would hinder implementation of the preferred strategy. See also suggestions re affordable housing policy below.</p>	<p>The preferred strategy should set out where coal operations would not be acceptable, with unequivocal statements as to why. The SA/SEA should be one of the processes used to reach these conclusions.</p> <p>Review the preferred strategy for implications re minerals. Provide clear evidence of how the key issue of flood risk has affected the development of the Preferred Strategy</p> <p>Provide clear evidence of how the key issue of infrastructure capacity / requirements have affected the development of the Preferred Strategy.</p> <p>Recast the policy to consider each of the 3 spatial zones and their infrastructure requirements.</p>

<p>Housing: The Preferred Strategy references the Ministerial Interim Planning Policy Statement 01/2006 (page 8) and accepts the SEWSPG work on regional apportionment (page 2.18). However, the regionally apportioned housing figure for Caerphilly appears to have been simply transposed into the Preferred Strategy document. There does not appear to be any evidence of detailed consideration of the consequences of such levels of growth in relation to the environmental capacity of the County, and neither is there any consideration of alternative levels of growth as part of a range of options for future development.</p> <p>In para 6.77 the Preferred Strategy document says limited housing development will also be allowed in the villages of Gelligaer and Trinant, where there is a need for a greater variety of housing to maintain the viability of these settlement. We consider that the Borough needs to ensure this is evidence based and won't just create vacancies elsewhere in the villages. The plan is to build 650 houses per year, but with the preferred option seeking to balance development it may be difficult to achieve this as the market pressure will come for development around Caerphilly, Cardiff and the South.</p> <p>We welcome the proposal to develop SPG on affordable housing. However, the preferred strategy provides insufficient discussion about how and where affordable housing should be achieved and what type. The Local Housing Market Assessment and Housing Strategy for Caerphilly CBC are not yet available, and the Preferred Strategy document does not indicate when they will be available (page 16). This should inform the evidence base for the detailed requirement for affordable housing, what type and where it would need to be located.</p> <p>Though it defines the overall level of housing provision to be achieved, Policy SP6 is not a spatial policy that shows how the figures and tenures will be delivered across the area. It also does not indicate the density assumptions that will underpin allocations.</p>	<p>The evidence base in relation to housing must be complete to adequately inform the deposit plan.</p> <p>The preferred strategy should be clearer about the potential amount and location for affordable housing given what the strategy assumes about land values, development potential and need. Revise the strategic policy to identify the rough breakdown of housing numbers and types across the three spatial strategy areas.</p>
<p>Employment: We note that consultants (Atkins) were appointed to do a sites and market appraisal. Assessments were based on a jobs requirement and a past trends basis. They have also undertaken to do a biennial survey/assessment of sites. In the Analysis Note there is no reference to an employment forecast although it does refer to ODPM advice. It refers to the potential for oversupply (on the basis of existing allocations). The proposed take up of existing allocations although very ambitious is not completely overstated.</p> <p>Though UDP employment sites have been subjected to a formal appraisal it is unclear in the text what the outcome has been in terms of reconfirmation of sites or allocation for other uses. Analysis of the economic linkages between Cardiff, the M4 corridor and the southern part of CCBC is weak. There is no reference to economic opportunities/threats and the influence that this has had on the strategy.</p>	

<p>There is little evidence that alternative economic scenarios or growth options have been considered. There is a strong impression that existing employment sites are being confirmed rather than alternative options considered and the strategy is highly concentrated on a few large sites -particularly Oakdale. The Preferred Strategy has a reliance on restraint in the south - Brownfield development and settlement boundary restraint – but the positive mechanisms to encourage development to divert to the north rather than elsewhere out of the area are not yet sufficiently considered. The “major conurbation” in the Northern Connections corridor is heavily reliant on, for example, take up at Oakdale. On this basis there should be emphasis on monitoring and management -a regular review of employment land take up and assessment of land use alternatives.</p> <p>There appears to be limited consideration of retail and other forms of employment. Has there been an assessment of retail need and identification of gaps in provision that exist or will arise from the strategy? Are there key strategic retail sites that need identification or key settlements that need retail consolidation?</p> <p>Policy SP7 has similar flaws to SP6 as noted above with the same remedy required. If there is a strategic policy (as per SP3) required to protect identified areas from other forms of development, it should be part of a revised SP7.</p>	<p>The SA notes that the LDP needs to consider this weakness: implementation mechanisms such as planning obligations and phasing for the strategy need to be clarified (also CE3)</p> <p>Consider retail requirements of the preferred strategy and their relationship to WSP key settlements for the region.</p> <p>Revise SP7.</p>
<p>Minerals</p> <p>We note that the context for minerals is contained in paragraphs 2.27 to 2.31 of the Preferred Strategy document. However, it is not apparent that the interaction between minerals planning and other development has been addressed in arriving at the preferred strategy (paras 6.1 – 6.3) either as an identified LDP issue or as an objective. Neither is there a clear minerals strategy set out, and there is no reference to adjacent authorities other than through the Regional Technical Summary for aggregates.</p> <p>Relevant national guidance is contained in Minerals Planning Policy Wales (2000) (MPPW), Minerals Technical Advice Note 1: Aggregates (MTAN1) and draft Minerals Technical Advice Note 2: Coal (MTAN2).</p> <p><u>We are aware of the following Minerals Resources in Caerphilly:</u></p> <p>Caerphilly has extensive minerals resources, summarised below to indicate the significance of the absence of proposals in the preferred strategy:</p> <p>Coal: Caerphilly has a narrow strip of primary resource (as defined in the draftMTAN2) along the southern rim of the South Wales coalfield and more extensive areas of primary resource along the</p>	<p>The preferred strategy, strategic policies and full deposit plan must be evidenced to have taken sufficient account of national policy on minerals.</p> <p>The identification of areas for future minerals working could be begun in advance of the Regional Technical Statement for aggregates and based on the draft MTAN2 for coal. The LDP should make a commitment to, and identify the options for, meeting the contribution to be identified in the Regional Technical Statement to meet local, regional and</p>

<p>northern rim, around Rhymney. Areas of secondary resource lie beneath Caerphilly itself, in areas between Nelson and Crumlin, and most extensively to the north and south of Rhymney. The remainder of Caerphilly is classified as tertiary resource, which has the potential for economic coal recovery but is not included in the draft MTAN guidance on safeguarding.</p> <p>Hard Rock : In addition to Devonian and Carboniferous sandstones, many of which are classified as high polished stone value (1A in Travers Morgan1993 - High specification aggregates for road surfacing materials, Department of the Environment), there are limited areas of outcrop of Carboniferous Limestone, along the rim of the South Wales syncline – approximately between Ty Rhiw in the west and Pontymister in the east.</p> <p>Sand And Gravel: The MTAN1 map (p21) indicates potential areas of sand and gravel to be safeguarded.</p> <p>Aggregates: As a part of the evidence base, and to help inform the RTS, it is a requirement to include an assessment of the current aggregates landbank and to state how many years of mineral extraction the landbank will provide.</p> <p>Policy SP12 on Minerals Safeguarding: This policy is not satisfactory as it does not accord with national policy for the following reasons:</p> <ul style="list-style-type: none"> - the caveat “where their impacts are acceptable” is not a requirement for safeguarding, as impacts may change with time and cannot be prejudged; - the caveat “where appropriate” is not a requirement for safeguarding, as impacts may change with time and cannot be prejudged; - the policy that no areas of coal and of sand and gravel are safeguarded conflicts with national policy (also see below); - the policy does not refer to, nor safeguard, any areas of hard rock which is in conflict with national policy. <p>Site assessment: We note that safeguarding of minerals resources is not included as a consideration in the initial site assessment procedure (Appendices document section 8).</p>	<p>national needs. The commitment to hard rock and sand and gravel extraction, should be in the form of existing sites, specific sites, preferred areas and areas of search. The sand and gravel resources shown in the Appendices Section 3 must be safeguarded in the LDP. The remaining acceptable coal resource areas and their buffer should be identified on the proposals map of the deposit LDP.</p> <p>The strategic safeguarding policy needs to protect the primary and secondary resource areas, excluding settlements and national / international designations and should not be balanced against tourism interests. Ensure that consideration of minerals safeguarding is explicit in site assessment and settlement boundary definition. Revise SP12.</p>
<p>Waste: National policy in PPW and TAN 21 requires development plans to make adequate provision for a network of waste facilities. The Preferred Strategy documents do not provide any information on this; nor do they indicate there has been any assessment of alternatives. Strategic policy SP11 for waste does not set out a coherent strategy but just indicates what is currently happening in the Regional Waste Plans. Allocations may flow from this work but may not.</p>	<p>Further clarification is required and discussions should be held with the Assembly to ensure the deposit plan is sound. Revise SP11.</p>

<p>Renewable Energy – Strategic Policy SP4: As drafted the encouragement of renewable energy to meet targets while protecting impacts on residential, amenity and biodiversity interests is considered to be a valuable objective. However, it is generic and not particularly related to the Caerphilly CBC area. While, paragraph 6.42, 6.53 includes mention of potential there is little certainty given in regard to renewable energy and little positive and proactive intent afforded through the policy. National Planning policy contained in MIPPS Renewable Energy (12.8.12, 12.9.1-2) and TAN 8 (5.1-3, 2.11-12) asks that authorities consider the opportunities which may exist for encouraging all forms of renewable energy and the contribution which they can make towards renewable energy targets and carbon emission reduction etc.</p>	<p>A strategic policy for renewable energy should indicate how and where the CBC will seek to encourage renewable energy provision. Whilst energy efficiency and conservation is acknowledged, further consideration could be given to ways of securing the benefits of renewable energy, energy efficiency and conservation as part of the general approach in the preferred strategy. Revise SP4.</p>
<p>Protection of the historic environment: - The PPW Companion Guide confirms that the range of policies for the protection of the historic environment contained in PPW (Ch 6) need not be replicated in the LDP. Strategic policy SP3(3) does provide a general policy to protect “the quality of our built environment” which is ambiguous, as it is unclear whether the term is intended to refer to townscape and architectural environment or to the broader historic environment – paras 2.9 and 7.1 appear to apply the term differently. - Section 11 of the preferred strategy document lists possible SPG. One additional SPG refers to Constraints Mapping and lists a number of examples of statutory constraints, including Listed Buildings and [Scheduled] Ancient Monuments.</p>	<p>The terminology relating to the built and historic environment should be clarified, consideration should be given to the need for a specific policy in the deposit LDP in line with the emerging findings of the SEA. The SPG map of constraints should be discussed with CADW when being prepared.</p>
<p>Design Policy SP2 conflicts with PPW Companion Guide advice re repetition of national policy.</p>	<p>Policy should be refocused to deliver the preferred strategy for example by:</p> <ul style="list-style-type: none"> - protecting strategic sensitive or regeneration areas by highlighting the need for special design policies (e.g. SLAs, town centres, Oakdale etc.) - implementing accessibility

	<p>objectives through density policy at transport nodes,</p> <ul style="list-style-type: none"> - defining strategic sites that require master plans and specific issues addressed in design statements, etc. or - local climate change issues such as sloping sites and passive solar gain.
<p>Climate Change - Strategic Policy SP5</p> <p>The proposed policy does not establish a baseline for successful implementation and repeats national policy. It does not give an indication of what measures will be looked for and how and when they will be sought in relation to the preferred strategy. How the policy relates to SEA objectives on energy efficiency, carbon footprints is not explicit.</p> <p>The policy expresses only one aspect of the mitigation of climate change. Draft MIPPS Planning for Climate Change and Climate Change Compendium refer to other resources efficiencies/conservation, such as water, and how the design and location of development can enable mitigation of the effects of climate change and adaptation to the effects of a changing climate over the lifetime of development. It is not clear therefore that the impacts of climate change are fully integrated into the preferred strategy. and that the strategy is capable of being responsive to this new agenda which necessitates taking account of the lifetime of settlements and new development.</p>	<p>Ensure that the preferred strategy areas of change have been assessed with relation to climate change adaptation and mitigation including energy sources and use.</p> <p>Reconsider this policy particularly in conjunction with SP1, SP4 and SP9.</p>
<p>Community Infrastructure / Strategic Policy SP9</p> <p>This could impact on how growth will be managed throughout the plan period and therefore on how objectives for the plan area are met.</p> <p>Further the consideration of infrastructure as part of candidate site assessment is based on the assumption that it will be provided by developers and appears to concentrate mainly on highway requirements. Does the infrastructure picture have an impact on the proposed extension to residential areas? What infrastructure requirements are needed to enable delivery of sites that support the preferred strategy? This assessment of strategic sites should feed into a realistic strategic policy on planning obligations.</p> <p>See also comments re Policy SP9 above.</p>	<p>Consider identifying policy requirements and/or strategic master planning for key areas of change.</p>

Flood risk

The issue of flood risk is identified in **SEA/SA**, and as part of **site assessment** methodology and seems to be carried through into site assessment. Paragraph 6.32 alludes to decisions with regard to the floodplain and the need to balance social and economic benefits. This doesn't go any further, however, than national policy and it isn't clear what ramifications these types of decisions will have in delivering the preferred strategy.

Consider local climate change mitigation issues in relevant strategic policy.

CE 3 There are clear mechanisms for implementation and monitoring	
Comments	Suggested Actions
<p>There is no mention of any monitoring procedures, and as the objectives are unclear and there are very few targets within the Preferred Strategy it is not possible to envisage what meaningful indicators could be developed to monitor the effectiveness of the strategy and its delivery mechanisms.</p> <p>There should be emphasis on employment development monitoring and management -a regular review of employment land take up and assessment of land use alternatives (see at CE1/2 above).</p> <p>The SEA covers/contains evidence base from TAN 15 (flood risk) and includes indicators and targets for monitoring - F) is a performance indicator for EAW and not really an appropriate target for monitoring environmental outcomes associated with the implementation of the plan. Please see required indicators in LDP Manual 9.5.4.</p>	<p>Ensure that there are clear mechanisms for implementation and monitoring of policy and objectives as indicated in the LDP Manual (Paragraph 9.5)</p>

CE 4 It is reasonably flexible to enable it to deal with changing circumstances	
Comments	Suggested Actions
<p>See comments re employment and housing above.</p>	<p>Ensure that the preferred strategy is sufficiently flexible to respond to changes in the economy, housing apportionment, strategic site take up, Wales Spatial Plan and other changes including HOV strategy delivery risks.</p>