

Meeting of:	<b>Cabinet</b>
Date of Meeting:	<b>Thursday, 15 December 2022</b>
Relevant Scrutiny Committee:	Environment and Regeneration
Report Title:	The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Integrated Sustainability Appraisal Scoping Report - Report of Consultation
Purpose of Report:	To advise Cabinet of the outcome of the consultation on the Integrated Sustainability Appraisal (ISA) Scoping Report and advise on the next stages of the ISA process.
Report Owner:	Cabinet Member for Community Engagement, Equalities and Regulatory Services
Responsible Officer:	Marcus Goldsworthy, Director of Place
Elected Member and Officer Consultation:	<p>Head of Sustainable Development            Lawyer - Legal Division            Operational Manager Accountancy            Corporate Equalities Officer            Head of Strategy, Community Learning and Resources            Strategy and Partnership Manager            Operational Manager Strategy and Resources            21st Century Schools Project Manager            Operational Manager Public Housing Services            Operational Manager Neighbourhood Services, Healthy Living and Performance            Head of Neighbourhood Services and Transport            Operational Manager Engineering            Operational Manager Transport Services            Principal Regeneration Officer            Operational Manager for Regeneration            Team Leader Countryside Services</p>

	<p style="text-align: center;">Council Ecologist Arts Development Officer Principal Tourism &amp; Marketing Officer Engineering Manager Conservation and Design Officer Strategic Estates Manager</p>
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Policy Framework:	This is a matter for Executive Decision by Cabinet.
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<p>Executive Summary:</p> <ul style="list-style-type: none"> <li>On 4th May, 2022 the Welsh Government formally approved the Council’s Delivery Agreement (DA) for the Replacement Local Development Plan (RLDP). The DA contains the timetable for preparing the RLDP together with the Community Involvement Scheme (CIS) which sets out how and when stakeholders and the community can engage with the plan making process. The agreement of the DA by the Welsh Government marks formal start of the RLDP process, and the Council is committed to the timescales and consultation processes contained within it.</li> <li>The Planning and Compulsory Purchase Act requires sustainable development to be at the heart of the development plan process and there is a statutory requirement for the RLDP to be subject to specific appraisals and assessments to meet this requirement. This legal requirement is met through the production of an Integrated Sustainability Appraisal (ISA) Report which seeks to identify the likely significant economic, social, environmental, and cultural effects of the emerging plan, and suggest measures to minimise any negative effects and maximise positive outcomes.</li> <li>The preparation of the ISA Scoping Report is the first stage in the ISA process and is an evidence gathering stage in order to set out the current economic, social, environmental and cultural well-being context of the Vale of Glamorgan including baseline data and seeks to identify issues which are relevant to the local area.</li> <li>The ISA Scoping Report for the emerging Vale of Glamorgan RLDP was prepared by specialist consultants AECOM and was approved by Cabinet for a 5-week public consultation on 7th June, 2022 (minute C39 refers). The public consultation took place between the 24th August and the 29th September, 2022. The responses made to the consultation have been considered by the council’s appointed consultants and this report provides details of the public consultation and any changes proposed to the ISA Framework.</li> </ul>	
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## **Recommendations**

1. That the content of this report on the Integrated Sustainability Appraisal Scoping Report public consultation are noted.
2. That the proposed amendments to the Integrated Sustainability Appraisal Scoping Report as set out in Appendix A are endorsed and that the Integrated Sustainability Appraisal Framework is updated accordingly.
3. That delegated authority be granted to the Head of Sustainable Development in consultation with the Cabinet Member for Community Engagement, Equalities and Regulatory Services and Director of Place to make typographical or other minor changes to the Scoping Report/ISA Framework as necessary.

## **Reasons for Recommendations**

1. To reflect the feedback from the public consultation and enable officers to finalise the Integrated Sustainability Appraisal Scoping Report/ISA Framework.
2. To reflect the feedback from the public consultation and enable officers to finalise the Integrated Sustainability Appraisal Scoping Report and to ensure that the RLDP fulfils the requirements and duties for Integrated Sustainability Appraisal (ISA) and Strategic Environmental Assessment (SEA).
3. To enable typographical or other minor amendments as necessary without the need to seek Cabinet approval.

## **1. Background**

- 1.1 The current Vale of Glamorgan Local Development Plan 2011-2026 (LDP) was adopted in June 2017. The LDP sets out the Council's planning policy framework for the development and use of land in the Vale of Glamorgan and forms the basis for consistent and rational decision-making and ensures the most efficient use of land and other limited resources.
- 1.2 On 19th October, 2020, cabinet endorsed a recommendation to commence a full review of the adopted LDP before 28th June, 2021 (minute C344A refers) in line with LDP Regulation 41. The review process seeks to ensure that the LDP remains up to date and responds to the new challenges and opportunities facing the authority over the next 15 years.
- 1.3 The first stage in preparing a Replacement LDP (RLDP) was the production of a Delivery Agreement (DA) which contained the timetable for preparing the RLDP and the Community Involvement Scheme (CIS) which sets out how and when stakeholders and the community can engage with the plan making process. Cabinet endorsed the draft DA on 14th March, 2022 (minute C877 refers) and the DA was formally approved by the Welsh Government on 4th May, 2022.

- 1.4** There is a statutory requirement for the RLDP to be subject to Sustainability Appraisal to ensure that the plan is underpinned by the principle of sustainable development.
- 1.5** The Integrated Sustainability Appraisal (ISA) is a mechanism for considering and communicating the likely significant economic, social, environmental, and cultural effects of the emerging RLDP, and any alternatives in terms of key sustainability issues, maximising the emerging plan's contribution to sustainable development. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the development plan's contribution to sustainable development. The ISA for the RLDP also fulfils the requirements and duties for:
- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA);  
Equalities Impact Assessment (EqIA);  
Health Impact Assessment (HIA);  
Welsh Language Impact Assessment (WLIA); and  
Well-Being of Future Generations.
- 1.6** The preparation of the ISA Scoping Report is the first stage of the ISA process and outlines the issues and objectives against which the sustainability of the RLDP will be assessed. The ISA Scoping Report is largely an evidence gathering stage and sets out the current economic, social, environmental and cultural well-being context including baseline data and identifies sustainability issues which are relevant to the local area. The main purpose of the scoping stage of the ISA is to identify the framework for the appraisal of the RLDP. The ISA framework draws together the ISA objectives identified under each theme through scoping, with the aims of addressing the key issues identified for each theme. Taken together the ISA objectives form a methodological framework guiding the subsequent assessment of the RLDP.
- 1.7** The process of preparing the ISA Scoping Report has involved a review of the national, regional and local plans, policies and strategies relevant to the preparation of the RLDP as well as a review of the social, economic, and environmental baseline characteristics of the Vale of Glamorgan.
- 1.8** The ISA Scoping Report identifies the key issues facing the Vale of Glamorgan under 10 specific ISA themes:
1. Economy and employment
  2. Population and communities
  3. Health and well-being
  4. Equality, diversity and inclusion
  5. Climate change (mitigation and adaptation)
  6. Transportation
  7. Natural resources (air, land, minerals and waste)
  8. Biodiversity and geodiversity

- 9. Historic environment
- 10. Landscape

- 1.9** Public involvement through consultation is a key element of the ISA process and at the scoping stage, the SEA Regulations require consultation with the statutory consultation bodies namely Natural Resources Wales (NRW), and Cadw for a minimum of 5 weeks. However, the Development Plans Manual (Edition 3, 2020) states that it is best practice to invite comments from other interested parties which is the approach set out in the Council's approved DA (May 2022). The ISA Scoping Report was therefore made generally available for public consultation.
- 1.10** The ISA Scoping Report for the emerging Vale of Glamorgan RLDP was prepared by specialist consultants AECOM and was approved by cabinet for a 5-week public consultation on 7th June, 2022 (minute C39 refers). A copy of the ISA Scoping Report is available [here](#).
- 1.11** The public consultation took place between 24th August and 29th September, 2022, and this report provides details of the comments received during the public consultation and the changes proposed as a result of the consultation.

## **2. Key Issues for Consideration**

- 2.1** To promote responses to the ISA Scoping Report, the consultation posed four questions as follows:
  - Q1 - Do you agree that the policy context is relevant, appropriate and up to date? If No, please explain how it should be changed.
  - Q2 - Do you have any comments on the baseline information presented, or any additional information/data you think would add value or is missing?
  - Q3 - Do you agree with the key issues that have been identified based on the policy context and baseline information? If No, please explain how they could be amended or what is missing.
  - Q4 - Do you have any comments on the ISA objectives and assessment questions that have been established to address the key issues?
- 2.2** In total, 19 responses were received on the ISA Scoping Report consultation from a range of organisations and individuals including comments from the statutory consultees (NRW and Cadw) as well as comments from the Welsh Government, general stakeholders, community councils as well as members of the general public.
- 2.3** In relation to the content of the ISA Scoping Report comments were made in respect of:
  - Soil/Best and Most Versatile Agricultural Land.
  - Small scale affordable housing to support local communities.

- Minerals – including the need for a Minerals Background paper in support of the RLDP and dormant mineral sites.
- Regional connectivity, housing, employment and transport.
- Crime and disorder and secured by design.
- Scale Housing and support for local.

**2.4** AECOM have considered the comments made during the public consultation and have where appropriate, proposed amendments to the ISA Framework. The comments received through the consultation and responses to them are shown in Appendix A. It should be noted that Appendix A is shown as part of the Initial ISA Report, the next element of the ISA process. An amended ISA Framework is attached at Appendix B. The amended ISA Framework includes changes resulting from comments made by the Mineral Product Association in respect of the requirements of Planning Policy Wales and the future safeguarding of minerals, and from Natural Resources Wales correcting terminology used within the ISA Framework assessment questions. More broadly, updated scoping information which includes consideration of new evidence/policy context and baseline data outlined through the representations received on the Scoping Report will be presented in the Initial ISA Report but not amended in the Scoping Report itself.

**2.5** It should be noted that several of the comments received on the ISA Scoping Report related to existing policies or designations within the adopted LDP and sought changes that while relevant to the overall RLDP process, were not specific to the content of the ISA Scoping Report and are more appropriately made in subsequent stages of the RLDP process. In most instances, the matters raised sought to justify amendments to existing LDP designations such as Special Landscape Areas or Green Wedges in order to accommodate future development. While such matters will be considered in subsequent stages of the RLDP process, they are not directly relevant to the ISA Scoping Report consultation.

#### **Next Stages**

**2.6** The production and finalisation of the ISA Scoping Report is the first stage in a five-stage process as set out below:

- Scoping (this stage).
- Appraise reasonable alternatives, with a view to informing preparation of the Pre-Deposit plan/Preferred Strategy, and subsequent assessment of the Pre-Deposit plan/Preferred Strategy.
- Prepare the ISA Report with a view to informing consultation.
- Consultation on the ISA Report; and
- Publish a ‘statement’ at the time of the plan adoption in order to ‘tell the story’ of plan-making/ISA (and present measures ‘decided concerning monitoring’).

**2.7** Accordingly, the next stage after scoping will involve the development and assessment of reasonable alternatives. This includes Candidate Sites and strategic options for the overall level and distribution of growth. An initial ISA Report will assess the growth options, and the strategic alternatives, considered in the formulation of the Preferred Strategy against the ISA objectives developed and set out in the Scoping Report.

**2.8** The table below illustrates the key stages and anticipated timescales for the preparation of the RLDP as set out in the approved Delivery Agreement.

Key Stages		Definitive Timescales
Stage 1 Delivery Agreement	Public consultation  Political Approval and Submission to Welsh Government  Approval from Welsh Government	November 2021 – December 2021 February 2022 – March 2022  April 2022
Stage 2 Pre-Deposit	Candidate Site call  Consultation on Integrated Sustainability Appraisal  Vision and Objectives/Growth Options  Consultation Preferred Strategy  Political approval of Preferred Strategy	June 2022 – August 2022 August 2022 – September 2022 April 2022 – November 2022 April 2023 – May 2023  September 2023
Stage 3 Deposit	Public Consultation Political approval for submission to Welsh Government	April 2024 – May 2024 November 2024 – December 2024
		Indicative Timescales
Stage 4	Submission	December 2024
Stage 5	Examination	March 2025 – April 2025
Stage 6	Inspector's Report preparation and publication	May 2025 – September 2025
Stage 7	Adoption	October 2025

### **3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?**

**3.1 Long Term** - The RLDP will set out a long-term vision for how the authority is expected to change in land use terms over the plan period and provides certainty for developers and the public.

**3.2 Prevention** - The RLDP will contain policies that seek to ensure that new development has a positive impact on the economy, the built and natural environment as well as the social and cultural well-being of the Vale of Glamorgan.

**3.3 Integration** - the RLDP will have regard to the Well-Being Plan and other relevant corporate strategies and policies that have been adopted by the Council. The influence of the RLDP covers numerous service areas and external organisations. Accordingly, it is recognised that they will play an important role in the preparation of the RLDP.

- 3.4 Collaboration** - the RLDP will be subject to extensive statutory consultation in accordance with the LDP Regulations 2005 (as amended 2015) and the Development Plans manual (Edition 3). To meet the objectives and targets set out in the RLDP, the Council will work in collaboration with external partners and agencies to ensure their successful delivery. The RLDP must also consider the impact on neighbouring local authorities and the Council is involved in several regional working groups which will inform the evidence base and influence emerging policies.
- 3.5 Involvement** - Engagement is a key aspect of the RLDP preparation process and is a key requirement under the Equalities Act 2010. Effective involvement of people and communities and collaboration with other organisations are two of the five ways of working set out in the Well-Being of Future Generations Act. The specific and general consultation bodies that will be consulted throughout the RLDP process are contained within the Community Involvement Scheme section of the Delivery Agreement which the Council must adhere to. The list is not exhaustive and will be added as appropriate throughout the RLDP process.

#### **4. Climate Change and Nature Implications**

- 4.1** The RLDP provides the local planning policy framework for delivering sustainable development in the authority up to 2036. It has a key role to play in making new development resilient to climate change, decarbonising society, and protecting and enhancing the natural environment. Climate change and biodiversity are identified as ISA themes in the ISA Scoping Report and the ISA Framework contains objectives for the RLDP in respect of climate change and biodiversity.

#### **5. Resources and Legal Considerations**

##### **Financial**

- 5.1** A dedicated budget is in place to fund the work required to prepare and adopt the RLDP this is supplemented by an earmarked reserve that is drawn down upon to fund additional costs associated with the preparation of the plan.

##### **Employment**

- 5.2** The ISA Scoping Report has been prepared by specialist external consultants who secured the work through a competitive tender process in line with the Council's Financial Standing Orders. Amendments to the ISA Scoping Report/Framework as a result of the public consultation as well as work on future ISA elements are included within the existing contract of works.

##### **Legal (Including Equalities)**

- 5.3** The Council is legally required to review its LDP pursuant to section 69 of the Planning and Compulsory Purchase Act 2004 and Regulation 41 of the Town and

Country Planning (Local Development Plan)(Wales) Regulations 2005 (as amended 2015). The 'Call for Candidate Sites' is a formal stage in the RLDP process.

- 5.4** The Well Being of Future Generations (Wales) Act 2015 seeks to improve the social, economic, environmental, and cultural well-being of Wales. Public bodies should ensure that decisions consider the impact they could have on people living in Wales in the future. The planning system is key to delivering sustainable development and the 5 ways of working are an intrinsic part of the planning system. A plan led approach is the most effective way of securing sustainable development.
- 5.5** The Community Involvement Scheme section of the Delivery Agreement sets out how the Council will engage with stakeholders throughout the RLDP process, including hard to reach groups, to enable all interested parties to participate in the Plan preparation process e.g. use of plain English and non-technical versions of reports, availability of documents in Welsh and large print versions of documents on request.
- 5.6** The ISA's impact assessments accounts for the legislative requirements of:
- (i) Compulsory Purchase Act 2004 - Sustainability Appraisal (SA)
  - (ii) The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 – Strategic Environmental Assessment (SEA)
  - (iii) Equalities Act 2010 – Equalities Impact Assessment (EqIA)
  - (iv) Welsh Language (Wales) Measure 2011 – Welsh Language Impact Assessment (WLIA); and
  - (v) Well-Being of Future Generations 2015.

## **6. Background Papers**

<https://gov.wales/development-plans-manual-edition-3-march-2020>

<https://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Final-English-Delivery-Agreement-PDF.pdf>

# Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan

**Initial ISA Report**

Vale of Glamorgan Council

November 2022

## Quality information

Prepared by	Checked by	Verified by	Approved by
Emma Hazell Environmental Planner	Rosie Cox Senior Environmental Planner	Alastair Peattie Associate	Alastair Peattie Associate

## Revision History

Revision	Revision date	Details	Name	Position
V1	7 <sup>th</sup> November 2022	Scoping Appendix draft	Rosie Cox	Senior Environmental Planner

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# Introduction

# 1. Introduction

## Background

### 1.1 To include

# Appendix A Regulatory requirements

As discussed in **Chapter 1** above, Schedule 2 of the Environmental Assessment of Plans (Wales) Regulations 2004 sets out the information that must be contained in the ISA Report

[insert table]

## Appendix B Scoping responses

As discussed in **Chapter 3**, the ISA scope is primarily reflected in a list of objectives ('the ISA framework'), which was established subsequent to a review of the sustainability 'context'/ 'baseline', analysis of key issues, and consultation. The detailed scoping information was presented in a Scoping Report sent to statutory consultees in 2022. The comments received are presented in **Table B1.1** below.

**Table B1.1 Statutory consultee responses to scoping**

Respondent	Consultation Response	AECOM Response
Cadw	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>Chapter 10 Historic Environment contains all of the relevant legislation, guidance, has identified appropriate sources of information and the issues that will need to be considered in the development of the RLDP.</p>	Thank you, comment noted.
Cardiff and the Vale University Health Board	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>The majority of the policy context is relevant and appropriate, but a significant piece of legislation is not included throughout the document: the Active Travel (Wales) Act 2013:</p> <p><b>1.8</b> – add Active Travel Act link here</p> <p><b>2.2</b> – reference Active Travel Act – relates to journeys to work; and also Llwybr Newydd (Wales Transport Strategy) – includes freight and logistics; and ports/ maritime transport</p> <p><b>4.2</b> – add Active Travel Act link here, not just strategy; and also Active Travel Act design standards (LAs are legally obliged to pay heed to these); and Llwybr Newydd (Wales Transport Strategy)</p> <p><b>Chapter 6</b> – also requires reference to Active Travel Act and Wales Transport Strategy</p> <p><b>Chapter 7</b> – good to see Wales Transport Strategy and Active Travel Act referenced here – also need emphasis on meeting AT Design guidance (Active Travel Act guidance   GOV.WALES) – painted lines on roads do not encourage modal shift. The Act is a legal requirement in Wales and this guidance must be paid heed</p>	<p>Thank you, comments noted – the Active Travel (Wales) Act and Active Travel Guidance will be considered as key pieces of context/evidence, to support the next stage of the ISA process.</p> <p>ISA is a high level, integrated process which fulfils the requirements and duties for HIA. It is considered that key issues and opportunities relating to health are reflected through the ISA framework. This will form the basis of the next stage of appraisal.</p>

Respondent	Consultation Response	AECOM Response
	<p>There is generally a comprehensive assessment in this document in terms of baseline information, policy context and consideration of future needs, but a more in-depth analysis using HIA methodology would strengthen the next stage of the ISA as it would enable more understanding of how the LDP proposals may impact upon specific population groups and health and well-being determinants. The WHIASU toolkit for LDPs offers guidance on this, including the appropriate stage to undertake a HIA screening workshop.</p> <p>It is very positive to see that consideration is being given to the importance of developing strong and cohesive communities, and taking a placemaking principle to the development of the LDP.</p> <p>A general observation is that there is not enough in here specifically referencing the Active Travel Act, the legal requirement for Councils to continue to improve the network; the substandard quality of much of the existing network in the Vale (albeit some recent schemes have been higher quality); the Active Travel design guidance; and significant issues around public transport which aren't fully reflected in the report and the need to improve and support both public transport and active travel infrastructure in order to reduce reliance on private vehicles. Proposed developments should support this by, for example, being sited near existing transport hubs, and ensuring high quality AT and public transport provision within their site schemes.</p>	
Cardiff and the Vale University Health Board	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p><b>2.57</b> – these should include options enabling or requiring sustainable transport for businesses</p> <p><b>3.19</b> – reference to good public transport provision – that is not always the case – in the Western Vale train services to Cardiff are only hourly and buses are irregular. These need to be significantly better in order to move away from reliance on private cars.</p> <p><b>4.4</b> – general health – comparing to Wales average shouldn't be our goal – there are high levels of obesity and overweight throughout Wales, including the Vale, alongside high levels of physical inactivity. These have significant health consequences for individuals and the population. 56% of the adult population in the Vale were overweight or obese in 2021-22 (Wales 62%), and 21% were active for less than 30 minutes in the previous week (Wales 30%) (data source: National Survey for Wales). Around two-thirds of adults in the UK are overweight or obese, which is a major public health concern and one which we should be aiming to address through a system-wide approach, including planning and design of our environment.</p>	<p>Thank you, comment noted – further baseline details provided will inform the next stages of the ISA process. Specifically, consideration will be given to pockets of deprivation in the Vale, and constraints and opportunities surrounding sustainable (including active) travel.</p> <p>Consideration will also be given to latest evidence regarding World Health Organisation guidance levels for NO<sub>2</sub> and PM2.5.</p>

Respondent	Consultation Response	AECOM Response
	<p><b>4.4</b> – inequalities – reference is made to the health inequalities in the Vale, but there should be stronger focus to highlight some significant inequalities in other domains of the WIMD as well, and reference made to the fact that there are 3 LSOAs in the Vale that are ranked in the 10% most deprived areas in Wales. All 10 of the most deprived LSOAs in the Vale are located in Barry, and they have inequalities in income, employment and education in particular. A section on inequalities should be included in the population chapter of the report, to recognise that although the Vale generally is fairly affluent, there are some areas with significant deprivation which needs to be addressed.</p>	
	<p><b>4.14</b> – healthy food environments are not just about growing spaces, but the food retail environment as well, so the LDP should give consideration to how to effectively support access to healthy food through the local retail environment.</p>	
	<p><b>4.21</b> – refers to ‘vast extent of walking and cycling routes’. Whilst there are lots of designated routes, many of the rural walking routes lack pavements (including in some towns) and there is little high quality segregated cycling infrastructure – although more schemes are being built (which is positive), overall the majority of cycle routes in the Vale do not meet Active Travel Act design guidance and are on-road cycling routes. These are not felt to be safe by many people, so are a significant barrier to uptake of sustainable travel.</p>	
	<p><b>4.23</b> – as above, NCN doesn’t mean high quality provision.</p>	
	<p><b>4.26</b> – inequalities – as above for 4.4 more detail around the high levels of deprivation would highlight this as a key concern. Reducing inequalities is about more than having access to healthy environments, green space and healthcare services, the LDP should aim to address inequalities through a number of actions including provision of high quality, affordable homes in accessible locations, employment opportunities, and local service provision.</p>	
	<p><b>4.28</b> – healthcare facilities – whilst there are a number of healthcare services across the Vale, the term ‘relatively well placed’ does not have any context to it so not sure what this means, is this in relation to the location of the major residential areas, or proximity to transport routes for example? Whilst it will certainly be important to improve accessibility for those in deprived areas through the provision of travel options and safe walking and cycling routes etc, the provision of any new services and assessment of capacity of existing services to absorb new housing growth will require discussion and negotiation with the Health Board. Different population groups have differing health needs which should be considered in healthcare service provision.</p>	
	<p><b>6.13</b> – while EVs are an important contributor to reducing emissions, travel modal shift to active travel and, particularly, public transport should be prioritised above this – EVs still have high embedded CO<sub>2</sub> emissions and contribute to all the other negative health impacts of car use (physical inactivity, air pollution [PM2.5 from tyre wear], social isolation/ loneliness, road</p>	

Respondent	Consultation Response	AECOM Response
	<p>traffic injuries and deaths). Key issue here is to improve active travel and public transport provision for residents, to reduce reliance on private car.</p> <p><b>7.17</b> – as above, many of these stations only have trains to Cardiff once an hour, not every 15 minutes, so this needs rewording. Frequency should increase to half hourly with the Metro, which will be positive. Need better walking/ cycling connections to train stations.</p> <p><b>7.28</b> – also legal requirement to continually improve the network and follow Active Travel Act design guidance – very few routes do currently.</p> <p><b>7.36</b> – for medium length journeys need to incorporate walking/ cycling/ public transport cross-modal travel.</p> <p><b>8.6</b> – also note significant decrease in World Health Organisation guidance levels for NO<sub>2</sub> and PM<sub>2.5</sub> to reflect adverse health impacts of air pollution. This would currently include many areas of the Vale under the new guidelines – continual reductions are still required in air pollution levels. (2021 - WHO global air quality guidelines: particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), ozone, nitrogen dioxide, sulphur dioxide and carbon monoxide).</p>	
Cardiff and the Vale University Health Board	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>Generally the key issues identified reflect the policy context and baseline information, just two points to note in chapter 4:</p> <p><b>4.29</b> – general health is good, but there are some significant health challenges including high levels of overweight and obesity, low levels of physical activity, and high levels of dementia. Health inequalities should be noted here too.</p> <p><b>4.29</b> – active travel networks are not good – there are some pockets of really good infrastructure but overall there needs to be much higher ambition to enable the modal shift required to address carbon emissions and physical inactivity. Lots of potential, but very few meet Active Travel Act design guidance.</p> <p>As above</p>	Thank you, comment noted – further baseline details provided will inform the next stages of the ISA process. Specifically, consideration will be given to health challenges in the Vale, and constraints and opportunities surrounding sustainable (including active) travel.
Cardiff and the Vale University Health Board	<p><b>Question Four: Do you have any comments on the ISA objectives and assessment questions that have been established to address the key issues?</b></p> <p>As above</p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
Glamorgan Gwent Archaeological Trust Ltd	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>See document attached. GGAT Representation – <a href="https://valeofglamorgan.oc2.uk/a/3j">https://valeofglamorgan.oc2.uk/a/3j</a></p>	Thank you, comment noted.
Glamorgan Gwent Archaeological Trust Ltd	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>See document attached. GGAT Representation – <a href="https://valeofglamorgan.oc2.uk/a/3j">https://valeofglamorgan.oc2.uk/a/3j</a></p>	Thank you, comment noted.
Glamorgan Gwent Archaeological Trust Ltd	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>See document attached. GGAT Representation – <a href="https://valeofglamorgan.oc2.uk/a/3j">https://valeofglamorgan.oc2.uk/a/3j</a></p>	Thank you, comment noted.
Glamorgan Gwent Archaeological Trust Ltd	<p><b>Question Four: Do you have any comments on the ISA objectives and assessment questions that have been established to address the key issues?</b></p> <p>See document attached. GGAT Representation – <a href="https://valeofglamorgan.oc2.uk/a/3j">https://valeofglamorgan.oc2.uk/a/3j</a></p>	Thank you, comment noted.
Mr Nigel Humphrey	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>The plan omits a benchmark assessment of where we are now, a strategy or plan for achieving net zero throughout the Vale, or objective methodologies for assessing the impacts of developments.</p> <p>The plan is expected to 'inform and influence the plan making process.....to mitigate negative impacts and maximise positive impacts.....and to reflect sustainable development</p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
	<p>objectives', but it makes no reference to the benchmarking studies published by the Senedd or any assessment methodologies, (such as the Code for Sustainable Homes or BREAM).</p> <p>The existing system of designating sites for housing development is consistently failing to meet the established need. The housing trajectory adopted by the VoG will need to determine the number of houses that will need to be built during the plan period and must find sites that will accommodate the identified level of growth in order for the plan to be found 'sound' at the Examination in Public stage.</p> <p>PPW 11 states that: Development plans must include clear policy criteria against which applications for housing development on unallocated sites will be considered. Infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall sites within settlements should be supported where they accord with the national sustainable place-making outcomes and supports infill development where it accords with the national sustainable place-making outcomes. Developments will need therefore to be acceptable in terms of highways, (access/egress), design, scale, density, safeguarding, residential amenity. Providing that any new development proposals comply with the policies set out within the LDP they should be acceptable in principle.</p> <p>Include TAN 6: Planning for sustainable rural communities. This provides a legal framework for assessing the sustainability of developments and states, (paragraph 4.15.2) that, One Planet Developments may take a number of forms. They can either be single homes, co-operative communities or larger settlements. They may be located within or adjacent to existing settlements. The TAN also requires application to be supported with robust evidence, (paragraph 4.16.1).</p> <p>Instead of identifying sites The RLDP should identify, alongside the designated sites, the standard required using these already established methodologies. Providing that any new development proposals comply with the policies set out within the plan they should be acceptable in principle.</p> <p>Additional Query – Where in this scoping document is there an objective methodology for assessing the impact of developments or a pathway to Zero Carbon?</p>	

Respondent	Consultation Response	AECOM Response
	<p>Attachments:</p> <p>Ecological and Carbon Footprints of Wales - <a href="https://valeofglamorgan.oc2.uk/a/4f">https://valeofglamorgan.oc2.uk/a/4f</a></p> <p>Regenerating Town Centres in Wales - <a href="https://valeofglamorgan.oc2.uk/a/4g">https://valeofglamorgan.oc2.uk/a/4g</a></p>	
<p>Ludlow Street Investment Corporation</p>	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>Requests review of MG18 Green wedges</p> <p>The representor does not agree that the current LDP policy wording, specifically relating to Policy MG18 (Green Wedges), is up to date. Policy MG18 identifies 7 green wedges, one of which, the green wedge between Dinas Powys, Penarth and Llandough is the specific one which the representor wishes to make comments against. The submitted candidate site 'Land West of Penlan Road, Llandough' as depicted below, is within the green wedge, but it is considered this designation should be removed.</p> <p>Revised Vale of Glamorgan Local Development Plan September 2022 Draft Integrated Sustainability Appraisal (ISA) Scoping Report Page 2 of 5 Land off Penlan Road, Llandough Site location (showing approximate site boundary in red)</p> <p>Revised Vale of Glamorgan Local Development Plan September 2022 Draft Integrated Sustainability Appraisal (ISA) Scoping Report Page 3 of 5 Land off Penlan Road, Llandough</p> <p>The settlement of Llandough is considered an inherently sustainable one, one which affords good and strong connections to Cardiff and Barry via other means of transport. This aerial depicts the geographical nature of the site overleaf. The Scoping acknowledges that 'the primary settlements of Dinas Powys, Llandough (Penarth), Rhoose, Sully, St. Athan and Wenvoe play an important role in providing a level of housing growth, in addition to some key local services and facilities.'</p> <p>Revised Vale of Glamorgan Local Development Plan September 2022</p>	<p>Thank you, comment noted – Designation of green wedge is not an issue for the ISA. LDP policy wording will be reviewed to ensure references are up to date within the next stage of ISA.</p>

Respondent	Consultation Response	AECOM Response
	<p data-bbox="353 244 1084 352">Draft Integrated Sustainability Appraisal (ISA) Scoping Report Page 4 of 5 Land off Penlan Road, Llandough</p> <p data-bbox="353 392 1469 483">Whilst the site is located within the Green Wedge in the adopted LDP, it is surrounded on all boundaries by existing development on all sides (as shown on the plan below), and as such its contribution towards the Green Wedge is limited.</p> <p data-bbox="353 523 1442 647">To the north, east and south of the site is residential development and to the west is the Llandough hospital site, which is allocated in the adopted LDP under Policy MG8 for the provision of health facilities, specifically the future development and expansion of Llandough Hospital.</p> <p data-bbox="353 687 1442 778">As shown on the above extract, the site sits in the context of the settlement of Llandough, between residential housing and the expansion area for Llandough Hospital. Therefore, it is considered the coalescence would not be jeopardised, and its development is acceptable.</p> <p data-bbox="353 818 1193 999">Page 8 of the non-technical summary for the ISA scoping report states: Revised Vale of Glamorgan Local Development Plan September 2022 Draft Integrated Sustainability Appraisal (ISA) Scoping Report Page 5 of 5 Land off Penlan Road, Llandough</p> <p data-bbox="353 1038 1456 1225">‘The adopted LDP currently identifies seven Green Wedges which retain the integrity and identity of key settlements. It is important that this policy is taken forward within the RLDP to support strategic, sustainable growth throughout the Vale in the long term. Access to services is a key issue, and the sustainable location of new development will be essential in ensuring residents can meet their day-to-day needs via sustainable modes of transport.’ [Emphasis Added]</p> <p data-bbox="353 1265 1469 1358">As quoted above, the emphasis of the replacement policy for Green Wedges must have sustainability at the heart. For this reason, it is considered that the release of this site from the green wedge, to provide development in line with sustainability criteria in settlements.</p>	

Respondent	Consultation Response	AECOM Response
	<p>The proposed removal of this land from green wedge designations, and allocation for residential purposes, would, in our view, align with wellbeing goals – A prosperous Wales, a healthier Wales, a globally responsible Wales in particular.</p> <p>Attachments:            Submission form – <a href="https://valeofglamorgan.oc2.uk/a/45">https://valeofglamorgan.oc2.uk/a/45</a>            Cover Letter – <a href="https://valeofglamorgan.oc2.uk/a/46">https://valeofglamorgan.oc2.uk/a/46</a></p>	
Ludlow Street Investment Corporation	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>See Q1</p> <p>A Green wedge review should take place to evaluate the purpose of all parcels of land in the green wedge – particularly this one in question. The purpose of the green wedge would not be undermined by its release from the designation, as set out within these representations and the candidate site submission.</p>	Thank you, comment noted – this will be considered through the ISA process.
Mr Adrian Miller	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>I can find no reference in the transportation section to wheelchair/ mobility scooter accessibility. Many junctions have no ramps even on main roads like pontypridd road ending up with users on road. Access to Porthkerry is not possible using swing gates from Pontypridd road estates meaning disabled users HAVE to drive to access park. There should be policy to redress this and accessibility transport issues</p> <p>Changes suggested by respondent:            A plan to review accessibility at all road junctions and access to public spaces for wheelchair/ mobility users.</p>	Thank you, comment noted – Policy formulation is not an issue for the ISA.
Mineral Products Association	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
	<p>No. As detailed in our response in December 2021, Section 2.2 (Table 2.1) reflects changes to Technical Advice Notes, it is important to remember that documents such as MTAN1 are also relevant. We would also recommend that this section refers to the Second Review of the RTS. These details are also omitted from Section 8.2 (Table 8.1) which is a significant oversight.</p> <p>Attachments: MPA Wales Representation - <a href="https://valeofglamorgan.oc2.uk/a/3k">https://valeofglamorgan.oc2.uk/a/3k</a></p>	
Mineral Products Association	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>Yes. We note the commentary states that the Vale of Glamorgan is required, through the LDP process, to meet the apportionment set out in the Second Review of the RTS which equates to 16.806MT of crushed rock over 25 years. The narrative also indicates that the authority currently has 18.730MT of existing land banks of permitted reserves for crushed rock meaning there is sufficient existing quantitative provision to meet the identified apportionment. However, it is important to acknowledge that the figures used in the RTS have a baseline of 2016 and will need to be reviewed to reflect both the amount of mineral worked since 2016 and the revised aspirations of the plan, particularly if the revised LDP contains new built development allocations. This will have an impact upon demand, the need for additional reserves and upon the safeguarding of mineral resources.</p> <p>Further, there are mineral operations within the Vale of Glamorgan where the mineral reserve forms an integral part of non-aggregate/industrial mineral supply. It is imperative that the LPA engages with the respective mineral operators to ensure robust and full modern reserve assessments are properly considered in the plan to ensure that the non-aggregate/industrial mineral reserves and aggregate reserves are accounted for separately to ensure the most sustainable use of the reserve and deliver a steady and adequate supply of both aggregates and industrial minerals. These matters should be addressed in the Minerals Background Paper which should then inform the plan. Supply cannot be assumed.</p> <p>We would also suggest that the large number of applications approved in both mineral safeguarding areas and within buffer zones may call in to question the robustness of the respective policies.</p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
	<p>Attachments: MPA Wales Representation - <a href="https://valeofglamorgan.oc2.uk/a/3k">https://valeofglamorgan.oc2.uk/a/3k</a></p>	
Mineral Products Association	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p><b>8.22</b> – Reference is made to ‘minerals’. It is important to distinguish between aggregate minerals and minerals used for industrial purposes. There should be clear distinction between permitted reserves of industrial minerals and those of aggregate minerals which should be included in the aggregate landbank to ensure supply of both aggregates and non-aggregate minerals can be maintained.</p> <p><b>8.23</b> – The landbank figure quoted (31,962,000 tonnes) is significantly in excess of the figure quoted in RTS2 (18,730,000 tonnes). It is not clear why this is the case, but we assume the higher figure may include reserves at dormant sites. This should be clarified.</p> <p><b>8.24</b> – This paragraph states that <i>“The authority currently has 18.730MT of existing landbanks of permitted reserves for crushed rock meaning there is sufficient existing quantitative provision to meet the identified apportionment.”</i> This is clearly not the case. The figure quoted is that at 31st December 2016 and not the current landbank.</p> <p><b>8.25</b> – The list of active, inactive and dormant sites differs from that included in the RTS. We believe that the workings at Forest Wood Quarry are currently being carried out by Ryan Jones Group and are wholly within that part of the quarry within Rhondda Cynon Taff. The reserves within the Vale of Glamorgan (VoG) are not being worked and there is no intention of working them now or in the future. This should be clarified with the operators. It is therefore not correct to say there is active working within the VoG at Forest Wood Quarry.</p> <p><b>8.26</b> – It is understood that a high proportion of the reserves at the adjacent Garwa Farm and quarry are industrial minerals. These should not be included within the aggregate landbank.</p> <p><b>8.26 and 8.27</b> – There should be clarification as to which of the sites listed are ‘dormant’ in the context of the Environment Act 1995 or the Planning and Compensation Act 1991 and require the submission of an application and ES before working could be resumed. The reference in 8.27 to the listed sites having been inactive for more than 10 years is informative in a general sense, but not relevant in the context of dormancy.</p> <p><b>Figure 8.5</b> – This map would benefit from the sites listed in the above paragraphs being numbered with corresponding annotation on the map.</p>	<p>Thank you, comment noted – baseline clarifications provided will inform the next stage of ISA. Furthermore, any update to the RTS2 will be reflected in the next stage of ISA.</p>

Respondent	Consultation Response	AECOM Response
	<p>Attachments: MPA Wales Representation - <a href="https://valeofglamorgan.oc2.uk/a/3k">https://valeofglamorgan.oc2.uk/a/3k</a></p>	
Mineral Products Association	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>As described above the figures used in the RTS have a baseline of 2016 and will need to be reviewed to reflect both the amount of mineral worked since 2016 and the revised aspirations of the plan, particularly if the revised LDP contains new built development allocations. This will have an impact upon demand, the need for additional reserves and upon the safeguarding of mineral resources.</p> <p>Further, there are mineral operations within the Vale of Glamorgan where the mineral reserve forms an integral part of non-aggregate/ industrial mineral supply. It is imperative that the LPA engages with the respective mineral operators to ensure robust and full modern reserve assessments are properly considered in the plan to ensure that the non-aggregate/ industrial mineral reserves and aggregate reserves are accounted for separately to ensure the most sustainable use of the reserve and deliver a steady and adequate supply of both aggregates and industrial minerals. These matters should be addressed in the Minerals Background Paper which should then inform the plan. Supply cannot be assumed.</p> <p>The baseline data should include the Annual Monitoring report produced by the South Wales Regional Aggregate Working Party and also the Collation of the results of the 2019 Aggregate Minerals Survey for England and Wales, published by the British Geological Survey.</p> <p>Attachments: MPA Wales Representation - <a href="https://valeofglamorgan.oc2.uk/a/3k">https://valeofglamorgan.oc2.uk/a/3k</a></p>	Thank you, comment noted – this will be considered through the ISA process.
Mineral Products Association	<p><b>Question Four: Do you have any comments on the ISA objectives and assessment questions that have been established to address the key issues?</b></p> <p>Whilst we support the ISA Objective “<i>To protect mineral resources</i>”, to avoid the sterilisation of mineral resources where possible, evidence would suggest that the large number of applications approved in both mineral safeguarding areas and within buffer zones calls in to question the robustness of the respective policies. In addition to ensuring that minerals</p>	Thank you, comment noted – ISA objective updated to ‘To protect mineral resources and ensure an adequate supply of a diverse range is available over the long-term’

Respondent	Consultation Response	AECOM Response
	<p>resources which may be needed in the future are safeguarded, PPW requires that an adequate supply of a diverse range of minerals is available over the long term. This should undoubtedly be an ISA objective.</p> <p>Minerals are essential for housing and infrastructure, such as schools, roads, railways, airports and flood defences and a steady and adequate supply of materials is necessary. This should also be reflected in Appendix A - the ISA Framework.</p> <p>The objectives should reflect the RTS in that any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. In addition, the RTS indicates that the planning authority should assess the likelihood of each of the dormant sites to be worked within the Plan period.</p> <p>All existing and potential new wharves and railheads should be identified for safeguarding within the LDP.</p> <p>Attachments: MPA Wales Representation - <a href="https://valeofglamorgan.oc2.uk/a/3k">https://valeofglamorgan.oc2.uk/a/3k</a></p>	
Penarth Town Council	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>Presents the Vale as 'self-contained', against national policy.</p> <p>Change suggested by respondent: Whilst the Policy context is up to date the majority of the document is written from the perspective that the Vale is self-contained. There is reference to the wider context in para 5.3 to Future Wales the emerging SDP <i>“providing a context for the provision of new infrastructure/ growth”</i>. The SDP <i>“also seeks to address regional factors such as housing and employment”</i>.</p> <p>Attachments: ISA Consultation Response - Penarth Town Council.docx – <a href="https://valeofglamorgan.oc2.uk/a/4t">https://valeofglamorgan.oc2.uk/a/4t</a></p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
Penarth Town Council	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>Reference how SDP &amp; RTP will influence RLDP are strategic issues being ignored on purpose? No details of collaboration with adjoining LAs.</p> <p>Change suggested by respondent: It is appreciated the SDP and RTP will have a long gestation period, but some reference needs to be made about how these Plans will influence this RLDP. Are strategic issues to be ignored in the expectation that they will be captured in the next review? Related to this is the issue of collaboration with adjoining authorities. The reference to this aspect in nonspecific in the Delivery Agreement.</p> <p>Attachments: ISA Consultation Response - Penarth Town Council.docx – <a href="https://valeofglamorgan.oc2.uk/a/4t">https://valeofglamorgan.oc2.uk/a/4t</a></p>	<p>Thank you, comment noted – cumulative effects are considered through the next stage of the ISA process.</p>
Penarth Town Council	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>Discuss wider regional context.</p> <p>Change suggested by respondent: Given that this is a scoping exercise, the wider context both with respect to issues which clearly require a regional context particularly economy, housing and transport and the need to collaborate set out in your Delivery Agreement.</p> <p>Development Plans Manual should be mentioned as an issue where relevant, given that the next stage in the process includes the defining of options.</p> <p>Attachments: ISA Consultation Response - Penarth Town Council.docx – <a href="https://valeofglamorgan.oc2.uk/a/4t">https://valeofglamorgan.oc2.uk/a/4t</a></p>	<p>Thank you, comment noted – this will be considered through the ISA process.</p>

Respondent	Consultation Response	AECOM Response
Penarth Town Council	<p><b>Question Four: Do you have any comments on the ISA objectives and assessment questions that have been established to address the key issues?</b></p> <p>As above</p>	Thank you, comment noted – this will be considered through the ISA process.
Penllyn Community Council	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>Penllyn Community Council wish to highlight the following areas of concern which we believe should be included within the scope of the ISA.</p> <p><b>1. Provision of small/ single dwelling affordable housing developments within all existing small rural communities</b></p> <p><b>2. Failure to consider wider and unintended effects of schemes to promote sustainable transport and health and well being</b></p> <p>Changes suggested by respondents:</p> <p><b>1. provision of small/ single dwelling affordable housing developments within all existing small rural communities</b></p> <ul style="list-style-type: none"> <li>• The provision of appropriate small scale (single unit) affordable housing within existing small rural communities and settlements is essential to maintain the balanced demographic critical for these communities to survive and thrive.</li> <li>• Failure to provide suitable local housing leads to the loss of both young and old residents, the breakup for the wider family unit and the consequential decline in the community.</li> <li>• As well as stimulating a cohesive and vibrant community, retention of such residents within their established settlement area maintains a community identity, reduces the demand on outside services and the use of private transport when travelling to family members for childcare and support of the elderly.</li> <li>• The current LDP singularly fails to provide for appropriate small scale [single unit] affordable housing development in rural communities and settlements to maintain the balanced housing stock necessary to meet the needs of old and young persons in their established rural communities.</li> <li>• Not only does the current LDP fail to recognise and encourage such development, but by omission and drafting it is frequently used as a tool to prevent such development, even when it is considered by the local community and</li> </ul>	Thank you, comment noted – the broad themes of affordable housing need, sustainable transport, and health and wellbeing, are reflected through the ISA framework. Localised spatial issues in relation to these themes will be considered through the next stage of the ISA process, and reflected in the RDLP policy framework.

Respondent	Consultation Response	AECOM Response
	<ul style="list-style-type: none"> <li>• Community Council to be appropriate, necessary and beneficial.</li> </ul> <p><b>Population and communities</b></p> <ul style="list-style-type: none"> <li>• Objective – To provide good quality market and affordable home and community infrastructure....to meet identified needs.</li> <li>• ...to enhance...community and settlement identity</li> <li>• Ensure an appropriate mix of dwelling size and type to meet the need of all sectors of the community.</li> <li>• Old and young families need appropriate affordable housing which is not only accessible to their place of work and local facilities but also to the family and support network within their existing [rural] community.</li> <li>• Sympathetic use of small sites with existing rural communities for affordable housing approved by the local community and Community Council does not lead to coalescence of settlement or undermine green infrastructure.</li> </ul> <p><b>Health and wellbeing</b></p> <ul style="list-style-type: none"> <li>• Objective - ..... to promote healthy and sustainable places.</li> <li>• Supporting healthy/ active and inclusive environments and the creation of cohesive, connected communities.</li> <li>• These aims are met not only by providing green infrastructure but by providing the opportunity to maintain balanced communities of all ages within existing small rural settlements.</li> </ul> <p><b>Equality diversity and inclusion</b></p> <ul style="list-style-type: none"> <li>• Objective - .... tackle social exclusion and promote community cohesion.</li> <li>• As with Health and Wellbeing these objectives are met by providing the opportunity to maintain balanced self-supporting communities of all ages, with the elderly and young families able to remain within their existing small rural settlements.</li> </ul> <p><b>Climate change</b></p> <ul style="list-style-type: none"> <li>• Objective - Support the resilience of the Vale....</li> <li>• Use of existing appropriate small sites within small rural settlement areas for suitable environmentally sound housing will help meet the demand for social housing with the minimum additional impact on the natural environment, infrastructure and transport.</li> </ul> <p><b>Transport and movement</b></p> <ul style="list-style-type: none"> <li>• Objective - Increase sustainable transport and reduce the need to travel</li> </ul>	

Respondent	Consultation Response	AECOM Response
	<ul style="list-style-type: none"> <li>• Provision of appropriate small-scale developments within existing rural settlements will not give rise to any appreciable increase in the need to travel any distance.</li> <li>• On the contrary the retention of the wider family unit within a community will provide a significant increase in the level of self-support and a reduction in the need to travel, usually by car, (due to the absence of public transport in the majority of rural communities) to support relatives and generally obtain community support.</li> </ul> <p><b>Natural resources</b></p> <ul style="list-style-type: none"> <li>• Objective - Identify and pursue opportunities to reduce exposure to air pollution</li> <li>• - Make best use of previously developed land and buildings</li> <li>• Use of small sites within existing settlements directly addresses both these objectives for all the reasons previously set out.</li> </ul> <p><b>2. Failure to consider wider and unintended effects of schemes to promote sustainable transport and health and well being</b></p> <ul style="list-style-type: none"> <li>• Proposals to promote Health and Wellbeing such as Active Travel Routes are perceived as automatically beneficial without due consideration of the wider often unintended consequences such schemes may have on existing community transport patterns.</li> <li>• In such cases where there is an impact on the provision of other services in the affected area then the overall effect is likely to be counterproductive.</li> <li>• E.G. If an Active Travel Scheme and the provision of a probably unlit cycle path undermines the provision of School Transport and removes the availability of school buses, without actually providing a safe practical alternative means for children of all ages to walk or cycle to school in a reasonable time, this can in practice encourage a significant number of additional private car journeys to deliver and collect those children from school.</li> <li>• The result is that although a cycle path has now been provided for the benefit of some, the overall impact on the community and environment is likely to be negative and totally contrary to the intended purpose as it will encourage the use of private motor vehicles and vehicle movement within the area of the school.</li> <li>• This issue impacts on and is applicable to the following themes and objectives within the SIA with further comments in italics:</li> </ul> <p><b>Health and well being</b></p> <ul style="list-style-type: none"> <li>• Benefits should be assessed with due regard to overall impact including existing services, not just the narrow objective of providing an Active Travel Route.</li> </ul>	

Respondent	Consultation Response	AECOM Response
	<p><b>Equality diversity and inclusion</b></p> <ul style="list-style-type: none"> <li>Consequential removal of existing facilities may be detrimental to inclusive access</li> </ul> <p><b>Transport and movement</b></p> <ul style="list-style-type: none"> <li>Objective - Increase sustainable transport</li> <li>Prioritising sustainable transport options and provision of cycle routes and facilities may actually increase car use if the full effects of the scheme are not considered and the unintended consequence is a reduction in other public or school transport services.</li> </ul> <p>Attachments: isa consultation response.pdf – <a href="https://valeofglamorgan.oc2.uk/a/3w">https://valeofglamorgan.oc2.uk/a/3w</a></p>	
Peter Stone Properties Ltd	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>Requests of MG17 SLAs</p> <p>Change suggested by respondent: The representor does not agree that the current LDP policy wording is up to date. Specifically relating to Policy MG17 – Special Landscape Area. Policy MG17 identifies 6 special landscape areas, one of which, Ely Valley &amp; ridge slopes is the specific one which the representor wishes to make comments against.</p> <p>The candidate site, Land south of the A48, Bonvilston, as depicted below is within the special landscape area, but it is considered baseline assessment for the special landscape area, especially for the immediate surrounds of Bonvilston should be revisited given the contextual changes through development as part of the currently adopted LDP. Moreover, this site in question should be, and is seen as an infill site. So any baseline assessment work should ensure this is at the heart of the assessment for this site.</p> <p>Revised Vale of Glamorgan Local Development Plan September 2022 Draft Integrated Sustainability Appraisal (ISA) Scoping Report Peter Stone Properties Ltd Page 2 of 3 Land South of A48, Bonvilston</p>	<p>Thank you, comment noted. LDP policy wording will be reviewed to ensure references are up to date within the next stage of ISA.</p> <p>Candidate sites are considered through the next stage of ISA.</p>

Respondent	Consultation Response	AECOM Response
	<p>Site Location Plan with site edged in red Illustrative Masterplan of the site</p> <p>A Landscape &amp; Visual Impact Assessment was undertaken to support the candidate site submission, and it concluded that the site could accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting, or the wider Ely Valley &amp; Ridge Slopes Special Landscape Area in which it is located. This conclusion was reached on the basis that the proposal is to incorporate sensitive landscaping and enhance existing landscape/ biodiversity features at the site where appropriate to ensure optimum screening to preserve the valued landscape character of the area. The formal report is yet to be submitted but the above is the interim report / findings.</p> <p>Revised Vale of Glamorgan Local Development Plan September 2022 Draft Integrated Sustainability Appraisal (ISA) Scoping Report Peter Stone Properties Ltd Page 3 of 3 Land South of A48, Bonvilston</p> <p>It is therefore considered that the baseline assessment for Policy MG17 should be amended to reflect this, and comments made in the future ISA statement of the land around Bonvilston and abutting the A48 owing to the contextual changes in recent years.</p> <p>Attachments: Cover Letter – <a href="https://valeofglamorgan.oc2.uk/a/47">https://valeofglamorgan.oc2.uk/a/47</a> Submission form – <a href="https://valeofglamorgan.oc2.uk/a/48">https://valeofglamorgan.oc2.uk/a/48</a></p>	
Peter Stone Properties Ltd	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>See Q1</p> <p>Change suggested by respondent: As above, it is considered that the baseline assessment for Policy MG17 should be amended to reflect this, and comments made in the future ISA statement of the land around Bonvilston</p>	Thank you, comment noted – this will be considered through the next stage of the ISA process.

Respondent	Consultation Response	AECOM Response
	<p>and abutting the A48 owing to the contextual changes in recent years, as well as the fact the land sits between existing residential dwellings and is an infill site.</p> <p>Attachments:            Cover Letter – <a href="https://valeofglamorgan.oc2.uk/a/47">https://valeofglamorgan.oc2.uk/a/47</a>            Submission form – <a href="https://valeofglamorgan.oc2.uk/a/48">https://valeofglamorgan.oc2.uk/a/48</a></p>	
Mr Tony Richards	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>Requests update to MG17 and ISA to reflect changing character of St Nicholas</p> <p>Changes suggested by respondent: As above</p> <p>Landscaping and enhance the existing landscape/ biodiversity features at the site where appropriate to ensure optimum screening to preserve the valued landscape character of the area. The formal report is yet to be submitted but the interim report / findings suggest that the proposal will not impact the value or quality of the SLA given its sensitive design and landscaping that replicates that of the adjoining developments at St Nicholas.</p> <p>It is therefore considered that the baseline assessment for Policy MG17 should be amended to reflect this, and comments made in the future ISA statement of the land around Bonvilston and abutting the A48 owing to the contextual changes in recent years.</p> <p>Attachments:            Comment Form – <a href="https://valeofglamorgan.oc2.uk/a/4r">https://valeofglamorgan.oc2.uk/a/4r</a>            Cover Letter – <a href="https://valeofglamorgan.oc2.uk/a/4s">https://valeofglamorgan.oc2.uk/a/4s</a></p>	<p>Thank you, comment noted – it is not the role of the ISA to amend policy. The next stage of ISA will consider details provided in relation to land around Bonvilston.</p>
Mr Tony Richards	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>See Q1</p>	<p>Thank you, comment noted – as above it is not the role of the ISA to amend policy. The next stage of ISA will consider details provided in relation to land around Bonvilston.</p>

Respondent	Consultation Response	AECOM Response
	<p>Change suggested by respondent: As above, it is considered that the baseline assessment for Policy MG17 should be amended to reflect this, and comments made in the future ISA statement of the land around Bonvilston and abutting the A48 owing to the contextual changes in recent years.</p> <p>Attachments: Comment Form – <a href="https://valeofglamorgan.oc2.uk/a/4r">https://valeofglamorgan.oc2.uk/a/4r</a> Cover Letter – <a href="https://valeofglamorgan.oc2.uk/a/4s">https://valeofglamorgan.oc2.uk/a/4s</a></p>	
South Wales Police	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>Request made for issues identified to be reflected in the document and for Secured by Design standards and principles to be considered for all developments.</p> <ol style="list-style-type: none"> <li>1. There is no mention of crime and disorder or your statutory obligation under the Crime and Disorder Act 1998.</li> <li>2. There does not seem to be any reference to the police initiative ‘Secured by Design’. The Secured by Design Gold award is a requirement by Welsh Government for grant funded social housing projects under their Development Quality Requirements (DQR). Crime and the fear of crime is a concern for communities. By building homes to Secured by Design standards research suggests crime can be reduced by up to 80%.</li> <li>3. All new schools built in Wales should meet Secured by Design standards and this is not reflected in this document.</li> <li>4. All planning applications that fall with the criteria for ‘Public Accessible Places’ should be referred to South Wales Police ‘Designing Out Crime officer’ at the ‘concept stage’ to work with Counter Terrorism Security Advisers to advise on reduction of vulnerability to terrorism and in line with the new legislation.</li> </ol> <p>Welsh Government’s Technical Advice note 12 states I quote:</p> <p><i>“5.17.3 The Safer Places<sup>31</sup> and Secured by Design Initiative<sup>32</sup> provide recognised standards that have been shown to reduce crime (particularly residential burglary) and the impact of</i></p>	<p>Thank you, comment noted – the next stage of the ISA process will consider the Crime and Disorder Act 1998 as part of the context review. Additionally, consideration will be given to the police initiative ‘Secured by Design’. However it is not the role of the ISA to set a requirement for Secured by Design standards and principles to be considered for all developments.</p>

Respondent	Consultation Response	AECOM Response
	<p><i>crime upon neighbourhoods. It is desirable for the security of all housing developments, public buildings, and all buildings funded by public bodies, to achieve similar measurable standards.”</i></p> <p>I would add and ask for the above to be reflected on in the document and for Secured by Design standards and principles to be considered for all developments.</p>	
South Wales Police	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>As above</p>	Thank you, comment noted as above.
South Wales Police	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>As above</p>	Thank you, comment noted as above.
Mr Rhodri Traherne	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>Requests changes to MG17 Special Landscape areas and the ISA to reflect the changing character of St Nicholas.</p> <p>Change suggested by respondent: The representor does not agree that the current LDP policy wording is up to date. Specifically relating to Policy MG17 – Special Landscape Area. Policy MG17 identifies 6 special landscape areas, one of which, Ely Valley &amp; Ridge Slopes is the specific one which the representor wishes to make comments against.</p> <p>The candidate site, Land at St Nicholas, is depicted in the below plans:</p> <p>Site location plan Site layout plan</p>	Thank you, comment noted – as above it is not the role of the ISA to amend policy. The next stage of ISA will consider details provided in relation to land around Bonsvilston.

Respondent	Consultation Response	AECOM Response
	<p>The site falls on the periphery, albeit within, the Ely Valley &amp; Ridge Slopes SLA. However, it is considered a baseline assessment for the special landscape area, especially for the immediate surrounds of St Nicholas and should be revisited given the contextual changes through development as part of the currently adopted LDP – through the completion of the Redrow ad Waterstone developments respectively.</p> <p>A Landscape &amp; Visual Impact Assessment was undertaken to support the candidate site submission, and it concluded that the site could accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting, or the wider Ely Valley &amp; Ridge Slopes Special Landscape Area in which it is located. This conclusion was reached on the basis that the proposal is to incorporate sensitive landscaping and enhance existing landscape / biodiversity features at the site where appropriate to ensure optimum screening to preserve the valued landscape character of the area.</p> <p>It is therefore considered that the baseline assessment for Policy MG17 should be amended to reflect this, and comments made in the future ISA statement of the land around St Nicholas and abutting the A48 owing to the contextual changes in recent years.</p> <p>Attachments:  Comment Form – <a href="https://valeofglamorgan.oc2.uk/a/3p">https://valeofglamorgan.oc2.uk/a/3p</a>  Cover Letter – <a href="https://valeofglamorgan.oc2.uk/a/3q">https://valeofglamorgan.oc2.uk/a/3q</a></p>	
Mr Rhodri Traherne	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>See Q1</p> <p>Change suggested by respondent:  As above, it is considered that the baseline assessment for Policy MG17 should be amended to reflect this, and comments made in the future ISA statement of the land around St Nicholas and abutting the A48 owing to the contextual changes in recent years.</p>	Thank you, comment noted as above.

Respondent	Consultation Response	AECOM Response
United Welsh Housing Association	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>Requests MG18 Green Wedge review</p> <p>Change suggested by respondent: The representor does not agree that the current LDP policy wording is up to date. Specifically relating to Policy MG18 – Green Wedges. Policy MG18 identifies 7 green wedges, one of which, the green wedge between Dinas Powys, Penarth and Llandough is the specific one which the representor wishes to make comments against.</p> <p>The candidate site, Land to the East of Caerleon Road, Dinas Powys, as depicted below is within the green wedge, but it is considered this designation should be removed.</p> <p>Revised Vale of Glamorgan Local Development Plan September 2022 Draft Integrated Sustainability Appraisal (ISA) Scoping Report United Welsh Page 2 of 4 Land to the East of Caerleon Road, Dinas Powys</p> <p>The settlement of Dinas Powys is considered an inherently sustainable one, one which affords good and strong connections to Cardiff and Barry via other means of transport. This aerial depicts the geographical nature of the site overleaf.</p> <p>Revised Vale of Glamorgan Local Development Plan September 2022 Draft Integrated Sustainability Appraisal (ISA) Scoping Report United Welsh Page 3 of 4 Land to the East of Caerleon Road, Dinas Powys</p> <p>Whilst the site is located within the Green Wedge in the adopted LDP, it is surrounded on all boundaries by existing development to the West, and as such its contribution towards the Green Wedge is limited.</p> <p>Page 8 of the non-technical summary for the ISA scoping report states:</p>	<p>Thank you, comment noted – as above it is not the role of the ISA to amend policy. The next stage of ISA will consider candidate sites.</p>

Respondent	Consultation Response	AECOM Response
	<p>The adopted LDP currently identifies seven Green Wedges which retain the integrity and identity of key settlements. It is important that this policy is taken forward within the RLDP to support strategic, sustainable growth throughout the Vale in the long term. Access to services is a key issue, and the sustainable location of new development will be essential in ensuring residents can meet their day-to-day needs via sustainable modes of transport. [Emphasis Added]</p> <p>As quoted above, the emphasis of the replacement policy for Green Wedges must have sustainability at the heart. For this reason, it is considered that the release of this site from the green wedge, to provide development in line with sustainability criteria in settlements.</p> <p>Consideration will need to be given to the transport hierarchy set out in PPW11, which prioritises walking, cycling and public transport ahead of private motor vehicles, and how future residents will meet their travel needs.</p> <p>As of present, in terms of public transport, there are four bus stops within walking distance (1km) of the site which are served by the 89A,93,95 and 304 services, which facilitate travel between Dinas Powys and Cardiff via Cogan and Penarth, and services also run via Barry. Therefore, it is considered the coalescence would not be jeopardised, and its development is acceptable.</p> <p>The proposed removal of this land from green wedge designations, and allocation for residential purposes, would, in our view, align with wellbeing goals – A prosperous Wales, a healthier Wales, a globally responsible Wales in particular.</p> <p>Attachments:  Cover Letter – <a href="https://valeofglamorgan.oc2.uk/a/43">https://valeofglamorgan.oc2.uk/a/43</a>  Submission form – <a href="https://valeofglamorgan.oc2.uk/a/44">https://valeofglamorgan.oc2.uk/a/44</a></p>	
United Welsh Housing Association	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>See Q1</p>	Thank you, comment noted – updates to the evidence base and release of Green Wedge are not decisions for the ISA.

Respondent	Consultation Response	AECOM Response
	<p>Change suggested by respondent: A Green wedge review should take place to evaluate the purpose of all parcels of land in the green wedge – particularly this one in question. The purpose of the green wedge would not be undermined by its release from the designation.</p> <p>Attachments: Cover Letter – <a href="https://valeofglamorgan.oc2.uk/a/43">https://valeofglamorgan.oc2.uk/a/43</a> Submission form – <a href="https://valeofglamorgan.oc2.uk/a/44">https://valeofglamorgan.oc2.uk/a/44</a></p>	
Vivard Ltd	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>The policies are relevant, but no mention is made of the way they conflict with each other. In the case of tourism, for example, you say that 85% of visitors come only for the day, but you do not say how many come by car. Nor do you say how the numbers have changed or are likely to change in the future. If even minor statistics like that are omitted from consideration, it is impossible to assess how large the shortfall will be in assessing the major policy on sustainability.</p>	Thank you, comment noted – cumulative/ in-combination effects will be considered through the next stage of the ISA process.
Vivard Ltd	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>As I said in answer to Question 1, the information supplied is incomplete. For example, the hospitality sector is pressing the British Government to allow visas for more European and other nationals because they have great difficulty in recruiting enough local people. Why is that? Is it because they are not paid enough, or because they do not want to work unsocial hours, or in jobs that are seasonal, or part-time? The simple facts we need are: how many vacancies are there in the hospitality sector? How many foreign nationals are employed? How much are they paid?</p> <p>Change suggested by respondent: First we need the facts. Then we need an analysis of the options. Then we would be able to approach possible solutions.</p>	Thank you, comment noted – the scoping report provides a high level overview of baseline information for the Vale of Glamorgan. Appraisal of options will be undertaken through the next stage of ISA.

Respondent	Consultation Response	AECOM Response
Vivard Ltd	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>Few would disagree with the key issues and it is very easy, as many public reports have shown, to write about them at great length. The problems come in recognising that we have made little progress in dealing with them. For example, it is now 35 years since the Brundtland Report recognised the crucial importance of sustainability. How much progress have we made since then? Is the total number of vehicle miles travelled in the Vale greater or less than it was in 1987? 1997? 2017? Do we consume more goods than we did then? Do we throw away more?</p>	<p>Thank you, comment noted – the role of the scoping report is to provide a high level overview of the baseline and key issues/ opportunities. These issues/ opportunities will be further explored through the next stage of the ISA process.</p>
Welsh Government	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>The Department welcomes the consideration of Best and Most Versatile Agricultural Land (BMVAL) and the role of soil for carbon storage and water management functions. Soil formation is extremely slow and therefore is considered a finite resource. Soil is a combination of specific properties and the interaction between the local climatic regime and specific site features. Once BMVAL is lost to development, it is lost forever. The policy seeks to conserve BMVAL and direct development to lower grades. The ISA Scoping Report lacks clarity and would benefit attention to the policy.</p> <p>Change suggested by respondent: The Department considers these to be relevant policies considering BMVAL and soil policy:</p> <ul style="list-style-type: none"> <li>• Future Wales, The National Plan 2040 <ul style="list-style-type: none"> <li>i. Page 27 (Wales: An Overview) identifies the BMV resource and states, <i>“Our productive land is a vital resource. Agriculture has shaped our landscapes and supported our rural and market towns for generations. We must continue to value and protect our agricultural land and ensure it can feed and support us”</i>.</li> <li>ii. Policy 9 - Resilient Ecological Networks and Green Infrastructure</li> </ul> </li> </ul> <p>In addition to page 27, page 79 identifies BMVAL as a National Natural Resource. The Department considers the functions and opportunities BMVAL provides should be safeguarded to maintain the resilience of national (ecosystems and green infrastructure) asset.</p>	<p>Thank you, comment noted – policies identified will be considered through the next stage of ISA.</p>

Respondent	Consultation Response	AECOM Response
	<p><i>“Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.”</i></p> <ul style="list-style-type: none"> <li>• The Policy for BMV agricultural land is included in PPW 11 (February 2021) under paragraphs 3.58 and 3.59 as detailed below: -</li> </ul> <p>The Best and Most Versatile (BMV) Agricultural Land</p> <p><b>3.58</b> – <i>“Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC)16 is the best and most versatile and should be conserved as a finite resource for the future.”</i></p> <p><b>3.59</b> – <i>“When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.”</i></p> <p>i) Paragraph 6.4.3 (bullet 4):</p> <p><b>6.4.3</b> – <i>“The planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems. Information contained in SoNaRR, Area Statements and species records from Local Environmental Record Centres should be taken into account. Development plan strategies, policies and development proposals must consider the need to:</i></p> <p><i>“[bullet 4] “safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat; and...”</i></p>	

Respondent	Consultation Response	AECOM Response
	<ul style="list-style-type: none"> <li>Technical Advice Note 6 (TAN 6) sets out practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities: - Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010)</li> </ul> <p><b>6.2 – Development involving agricultural land</b></p> <p><b>6.2.1 –</b> <i>“When preparing development plans and considering planning applications, planning authorities should consider the quality of agricultural land and other agricultural factors and seek to minimise any adverse effects on the environment.”</i></p> <p><b>6.2.2 –</b> <i>“Planning authorities should bear in mind that, once land is built on, the restoration of semi natural and natural habitats and landscape features is rarely possible and usually expensive, and archaeological and historic features cannot be replaced. Also, once agricultural land is developed, even for ‘soft’ uses such as golf courses, its return to agriculture as best and most versatile agricultural land is seldom practicable”.</i></p> <p><b>6.2.3 –</b> <i>“Agricultural land is classified by grades according to the extent to which its physical or chemical characteristics impose long term limitations on agricultural use for food production. There are 5 grades of land numbered 1 to 5, with grade 3 divided into two sub-grades. The best and most versatile land falls into grades 1, 2 and sub-grade 3a and is the most flexible, productive and efficient in response to inputs”.</i></p> <ul style="list-style-type: none"> <li>The DCPO Letter (dated 1st March 2022) clarifies Welsh Government policy concerning Best and most versatile agricultural land and solar PV arrays   GOV.WALES Natural Resources Policy (2017).</li> </ul> <p>The Natural resources policy highlights the benefits derived from our natural resources: - Benefits derived from Wales’ natural resources. The benefits and services our ecosystems provide to society include:</p> <ul style="list-style-type: none"> <li>Provisioning services: such as crops, livestock, fish and timber; and natural fluxes of energy</li> <li>Regulating services: such as water and air purification, noise regulation, carbon sequestration, flood risk management, waste assimilation and pollination</li> <li>Cultural services: such as recreation and associated health and wellbeing benefits; our historic environment and appreciation of our beautiful places, landscapes and nature, and</li> <li>Supporting systems and services: such as soil formation and nutrient cycling necessary for the production of all other ecosystem services. These systems and services are underpinned by biodiversity.</li> </ul> <p>The policy also states:</p>	

Respondent	Consultation Response	AECOM Response
	<p>To build resilience into our ecosystems we need to: ... better manage our soil and safeguard our best and most versatile agricultural land to improve soil quality, productive capacity and its resilience to degradation.</p>	
Welsh Government	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>The ISA Scoping Report makes reference to the 'predictive ALC' and includes maps of 'Post 1988 ALC Surveys' (Fig. 8.3) and 'Predictive ALC' (Fig. 8.4). However, the way BMVAL is characterised across the county is unclear and potentially misleading.</p> <p>Changes suggested by respondent:  'Land and soil:  Agricultural Land Classification (ALC)</p> <p><b>8.19</b> Reflecting it's the rural nature, approximately 85% (28,132 hectares) of the Vale is agricultural land. Post 1988 ALC surveys have been carried out for a small percentage of the Vale, as presented in Figure 8.3. There are areas of Grade 2 BMV agricultural land present to the east of Bonvilston and northwest of Llantwit Major.</p> <p><b>8.20</b> In light of limited post 1988 data, there is a need to rely on the predictive ALC mapping for the Vale (see Figure 8.4).</p> <p>Most agricultural land within the Vale of Glamorgan is classified as Grade 2 or Grade 3. There appear to be areas of high-quality agricultural land (Grade 1 and 2) to the north and central Vale, notably around Bonvilston, east of Cowbridge, and in the north eastern corner of the Vale around St Bridges Major and Corntown. However, it is recognised that this is predictive data, and a level of uncertainty therefore exists without full surveys being carried out.</p> <p><b>8.21</b> It is worth noting that agricultural land, especially land that utilises farming methods such as conservation tillage, also acts as a carbon sink, storing carbon in the soil through sequestration. When land is disturbed, such as when it is developed for housing, carbon is released into the atmosphere, contributing towards climate change.'</p> <p>The approach noted in 8.20 does not follow published guidance: Agricultural land classification: predictive map guidance   GOV.WALES See flowchart on page 2 of the guidance which outlines appropriate steps to identifying BMVAL.</p> <p>Classification of BMVAL is not clear. Paragraph 8.20 appears to classify high-quality agricultural land as Grades 1 and 2. Paragraph 3.58 of PPW 11 (February 2021) clearly states</p>	<p>Thank you, comment noted – the next stage of ISA will use agricultural land classification: predictive map guidance provided by GOV.WALES, in addition to the GOV.WALES summary of the distribution of land quality by Local Planning Authority, and Predictive Agricultural Land Classification (ALC) Map for Wales (2019).</p> <p>Standard colour notations will be used on all maps for ALC grading going forward.</p>

Respondent	Consultation Response	AECOM Response
	<p data-bbox="336 239 1456 303">'agricultural land of grades 1, 2 and 3a... is best and most versatile agricultural land and should be conserved as a finite resource for the future'.</p> <p data-bbox="336 343 1456 406">The amount of BMVAL across the county is not clear. A summary of the distribution of land quality by Local Planning Authority can be found here: -</p> <p data-bbox="336 414 1456 446">Agricultural land quality statistics: planning authorities 2020   GOV.WALES</p> <p data-bbox="336 454 1456 542">The Vale of Glamorgan has a total of approximately 26,383 hectares of agricultural land of which almost a third, or approximately 7426 hectares are classified as BMVAL (Grade 1, 2, and 3a).</p> <p data-bbox="336 582 1456 742">In figures 8.3 and 8.4, non-standard colour notations have been used on the maps for ALC grading. To ensure clarity and avoid confusion, it is requested that the standard ALC grade mapping colours are used and both maps amended accordingly. The standard colour notations for ALC grades are described in the published 'ALC Frequently Asked Questions Document' on page 3 – see copy below for information.</p> <p data-bbox="336 782 1456 813">Agricultural Land Classification (ALC) Information.</p> <p data-bbox="336 821 1456 909">To assist LPA's in meeting BMV Policy requirements, the Department has produced the 'Predictive Agricultural Land Classification (ALC) Map for Wales (2019)'. This map is available to view and download on Data Map Wales, via the links below: -</p> <p data-bbox="336 949 1456 981">Predictive ALC Map –</p> <p data-bbox="336 989 1456 1021">Predictive Agricultural Land Classification (ALC) Map 2   DataMapWales (gov.wales)</p> <p data-bbox="336 1029 1456 1061">ALC Survey information –</p> <p data-bbox="336 1069 1456 1101"><a href="https://datamap.gov.wales/layers/inspire-wg:Post_1988_ALC_Wales_Surveys">https://datamap.gov.wales/layers/inspire-wg:Post_1988_ALC_Wales_Surveys</a></p> <p data-bbox="336 1109 1456 1141"><a href="https://datamap.gov.wales/layers/inspire-wg:Post_1988_ALC_Wales_Surveys_Boundary">https://datamap.gov.wales/layers/inspire-wg:Post_1988_ALC_Wales_Surveys_Boundary</a></p> <p data-bbox="336 1149 1456 1383">The map has been produced to assist LPA's make informed decisions regarding agricultural land quality and application of BMV Policy at an early stage in plan development, and as an evidence base for strategic planning and sustainability appraisal. Where the department holds detailed validated ALC survey information for a site, this is also shown on the map. The Department has also produced guidance on the use of the Predictive ALC Map and when to commission a detailed ALC survey. The guidance is available on the Welsh Government website at <a href="https://gov.wales/agricultural-land-classification-predictive-mapguidance">https://gov.wales/agricultural-land-classification-predictive-mapguidance</a></p>	

Respondent	Consultation Response	AECOM Response
	<p>To meet the requirements of Para 3.58 and 3.59, the Department expects the Policy to be taken into account at the earliest point in the process and throughout. The department also expects that BMV policy is sufficiently evidenced and justified in the plan, sustainability appraisal, spatial strategy and site selection process – what weight has been given to BMV land; how BMV policy has been applied to the spatial strategy and site selection? It is recommended that a specific topic paper is produced to demonstrate how the BMV policy has been applied and addressed.</p> <p>Need to consider areas of peatland. Paragraph 6.4.3 (bullet 4) of PPW 11 (February 2021) notes the need to <i>“safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat; and...”</i></p> <p>The Peatlands of Wales map can be found at Data Map Wales and provides an updated distribution of Welsh Peatlands (to 2022) based on current evidence sources. Peatlands of Wales Maps   DataMapWales (gov.wales)</p>	
Welsh Government	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>Soil is an ecologically and economically valuable resource that sustains life and provides crucial ecosystem services to Wales. These services include providing food and timber, regulating, storing and purifying water, and making important contributions to climate regulation, biodiversity and protection from natural disasters. Due to a slow formation process, soil is considered a finite resource. Further evidence concerning Welsh soils can be found here <a href="#">Review of Welsh soil evidence   GOV.WALES</a></p> <p>The Department agrees that BMVAL is a key issue however, the full range of soil functions should be considered. The Department welcomes the consideration of soils as a carbon store as one of the important services and functions provided.</p>	Thank you, comment noted – full range of soil functions including peatlands will be considered through the next stage of the ISA process.

Respondent	Consultation Response	AECOM Response
	<p>Soil is an ecologically and economically valuable resource that sustains life and provides crucial ecosystem services to Wales. These services include providing food and timber, regulating, storing and purifying water, and making important contributions to climate regulation, biodiversity and protection from natural disasters. Due to a slow formation process, soil is considered a finite resource.</p> <p>Further evidence concerning Welsh soils can be found here <a href="#">Review of Welsh soil evidence   GOV.WALES</a></p> <p>Change suggested by respondent: Consider full range of soil functions including peatlands. Please refer to Questions 1 &amp; 2.</p>	
Welsh St Donats Community Council	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>Welsh St Donats Community Council has no comments to make on the above but appreciates being consulted.</p>	Thank you, comment noted.
Welsh St Donats Community Council	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>Welsh St Donats Community Council has no comments to make on the above but appreciates being consulted.</p>	Thank you, comment noted.
Welsh St Donats Community Council	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>Welsh St Donats Community Council has no comments to make on the above but appreciates being consulted.</p>	Thank you, comment noted.
Welsh St Donats Community Council	<p><b>Question Four: Do you have any comments on the ISA objectives and assessment questions that have been established to address the key issues?</b></p> <p>Welsh St Donats Community Council has no comments to make on the above but appreciates being consulted.</p>	Thank you, comment noted.

Respondent	Consultation Response	AECOM Response
Windel Energy	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>See response attached for full details</p> <p>Change suggested by respondent: The Environment (Wales) Act 2016 provided the legislative framework to reduce greenhouse gas emissions. This Act was updated in March 2021 to legally bind the 'net zero' by 2050 target.</p> <p>To align with this, Planning Policy Wales (PPW), February 2021, outlines that the planning system should facilitate delivery of reducing carbon emissions and meet Welsh, UK, and European targets on renewable energy.</p> <p>Future Wales: The National Plan 2040, also published in February 2021, provides a national Development Plan framework that the Replacement Local Development Plan can look to fulfil at the local authority level. The Replacement Local Development Plan is to be in conformity with the Future Wales. Key policies relating to renewable and low carbon energy are set out in Policies 17 and 18. These confirm that the Welsh Government strongly supports the principle of developing Vale of Glamorgan Council – Draft ISA Scoping Report 2 renewable and low carbon energy to meet future needs and sets out further criteria that, if compliant with, proposals will be permitted. Further, in relation to planning for energy proposals, it is outlined on page 99 that <i>“the Welsh Government will support regional and local energy planning to identify opportunities for all types of renewable projects”</i>.</p>	Thank you, comment noted – this will be considered through the ISA process.
Glamorgan-Gwent Archaeological Trust Limited	The Integrated Sustainability Appraisal Scoping Report encompasses a variety of elements which contribute to your authority's area as a whole, and we note that these include archaeology and the historic environment in Chapter 10.	Thank you, comment noted.
Glamorgan-Gwent Archaeological Trust Limited	As we have noted previously, the resource which forms the historic environment in the Vale of Glamorgan is important and is formed both of statutorily designated historic assets (both areas and structures), and a much greater number of non-designated historic assets, noted in the Historic Environment Record. These include features and finds from the prehistoric period through to modern industrial and maritime and are represented by a variety of types of site all of which contribute to the distinctive heritage and current form of the area. These should not be seen as any constraint to development but viewed with the aims of the Well-being of Future	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
	Generations (Wales) Act, contribute substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals.	
Glamorgan-Gwent Archaeological Trust Limited	The report takes into account the strategic cascade of legislation and policy, and the inclusion of these into the LDP to ensure that the measures to protect and enhance the historic environment are undertaken.	Thank you, comment noted.
Glamorgan-Gwent Archaeological Trust Limited	We note that further reference to current legislation and Policy relating to the Historic Environment: The Historic Environment (Wales) Act 2016; and TAN24: The Historic Environment, is included, as well as statutorily protected (Scheduled and Listed) designated historic assets. It should be noted that these are outnumbered by non-designated historic assets, detailed within the Historic Environment Record, and that these are more likely to be directly impacted by change or development. With the extant legislation, and policies, and existing best practice guidance <a href="#">Best-practice guidance   Cadw (gov.wales)</a> enhancement and protection is given to the historic assets that give a sense of place and value.	Thank you, comment noted – this will be considered through the ISA process.
Glamorgan-Gwent Archaeological Trust Limited	Any proposed works, planned or unplanned change, may also have an impact on the historic environment, and it would be responsible to check with GGAT's Stewardship teams for advice enquiries@ggat.org.uk if there is any concern as to the presence of historic assets in any area.	Thank you, comment noted – this will be considered through the ISA process.
Mineral Products Association	<p><b>Question One: Do you agree that the policy context is relevant, appropriate and up to date? If no, please explain how it should be changed.</b></p> <p>No. As detailed in our response in December 2021, Section 2.2 (Table 2.1) reflects changes to Technical Advice Notes, it is important to remember that documents such as MTAN1 are also relevant. We would also recommend that this section refers to the Second Review of the RTS. These details are also omitted from Section 8.2 (Table 8.1) which is a significant oversight.</p>	Thank you, comment noted – the second review of the RTS will be considered through the next stage of the ISA process.
Mineral Products Association	<p><b>Question Two: Do you have any comments on the baseline information presented, or any additional information/ data you think would add value or is missing?</b></p> <p>Yes. We note the commentary states that the Vale of Glamorgan is required, through the LDP process, to meet the apportionment set out in the Second Review of the RTS which equates to 16.806MT of crushed rock over 25 years. The narrative also indicates that the authority currently has 18.730MT of existing land banks of permitted reserves for crushed rock meaning there is sufficient existing quantitative provision to meet the identified apportionment. However, it is important to acknowledge that the figures used in the RTS have a baseline of 2016 and will need to be reviewed to reflect both the amount of mineral worked since 2016</p>	Thank you, comment noted as above. Consideration will be given to any new evidence surrounding the Vale's mineral resource through the next stage of ISA.

Respondent	Consultation Response	AECOM Response
	<p>and the revised aspirations of the plan, particularly if the revised LDP contains new built development allocations. This will have an impact upon demand, the need for additional reserves and upon the safeguarding of mineral resources.</p> <p>Further, there are mineral operations within the Vale of Glamorgan where the mineral reserve forms an integral part of non-aggregate/industrial mineral supply. It is imperative that the LPA engages with the respective mineral operators to ensure robust and full modern reserve assessments are properly considered in the plan to ensure that the non-aggregate/industrial mineral reserves and aggregate reserves are accounted for separately to ensure the most sustainable use of the reserve and deliver a steady and adequate supply of both aggregates and industrial minerals. These matters should be addressed in the Minerals Background Paper which should then inform the plan. Supply cannot be assumed.</p> <p>We would also suggest that the large number of applications approved in both mineral safeguarding areas and within buffer zones may call in to question the robustness of the respective policies.</p>	
Mineral Products Association	<p><b>Question Three: Do you agree with the key issues that have been identified based on the policy context and baseline information? If no, please explain how they could be amended or what is missing.</b></p> <p>As described above the figures used in the RTS have a baseline of 2016 and will need to be reviewed to reflect both the amount of mineral worked since 2016 and the revised aspirations of the plan, particularly if the revised LDP contains new built development allocations. This will have an impact upon demand, the need for additional reserves and upon the safeguarding of mineral resources.</p> <p>Further, there are mineral operations within the Vale of Glamorgan where the mineral reserve forms an integral part of non-aggregate/industrial mineral supply. It is imperative that the LPA engages with the respective mineral operators to ensure robust and full modern reserve assessments are properly considered in the plan to ensure that the non-aggregate/industrial mineral reserves and aggregate reserves are accounted for separately to ensure the most sustainable use of the reserve and deliver a steady and adequate supply of both aggregates and industrial minerals. These matters should be addressed in the Minerals Background Paper which should then inform the plan. Supply cannot be assumed.</p>	<p>Thank you, comment noted. LPA stakeholder engagement is not a consideration for the ISA. Any new evidence will be considered through the next stage of ISA.</p>

Respondent	Consultation Response	AECOM Response
Mineral Products Association	<p>The baseline data should include the Annual Monitoring report produced by the South Wales Regional Aggregate Working Party and also the Collation of the results of the 2019 Aggregate Minerals Survey for England and Wales, published by the British Geological Survey.</p> <hr/> <p><b>Question Four: Do you have any comments on the ISA objectives and assessment questions that have been established to address the key issues?</b></p> <p>Whilst we support the ISA Objective “To protect mineral resources”, to avoid the sterilisation of mineral resources where possible, evidence would suggest that the large number of applications approved in both mineral safeguarding areas and within buffer zones calls in to question the robustness of the respective policies. In addition to ensuring that minerals resources which may be needed in the future are safeguarded, PPW requires that an adequate supply of a diverse range of minerals is available over the long term. This should undoubtedly be an ISA objective. Minerals are essential for housing and infrastructure, such as schools, roads, railways, airports and flood defences and a steady and adequate supply of materials is necessary. This should also be reflected in Appendix A - the ISA Framework.</p> <p>The objectives should reflect the RTS in that any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. In addition, the RTS indicates that the planning authority should assess the likelihood of each of the dormant sites to be worked within the Plan period.</p> <p>All existing and potential new wharves and railheads should be identified for safeguarding within the LDP.</p> <p>Further comments:</p> <p><b>8.22</b> – Reference is made to ‘minerals’. It is important to distinguish between aggregate minerals and minerals used for industrial purposes. There should be clear distinction between permitted reserves of industrial minerals and those of aggregate minerals which should be included in the aggregate landbank to ensure supply of both aggregates and non-aggregate minerals can be maintained.</p> <p><b>8.23</b> – The landbank figure quoted (31,962,000 tonnes) is significantly in excess of the figure quoted in RTS2 (18,730,000 tonnes). It is not clear why this is the case, but we assume the higher figure may include reserves at dormant sites. This should be clarified.</p> <p><b>8.24</b> – This paragraph states that “The authority currently has 18.730MT of existing landbanks of permitted reserves for crushed rock meaning there is sufficient existing quantitative provision to meet the identified apportionment.” This is clearly not the case. The figure quoted is that at 31st December 2016 and not the current landbank.</p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
	<p><b>8.25</b> – The list of active, inactive and dormant sites differs from that included in the RTS. We believe that the workings at Forest Wood Quarry are currently being carried out by Ryan Jones Group and are wholly within that part of the quarry within Rhondda Cynon Taff. The reserves within the Vale of Glamorgan (VoG) are not being worked and there is no intention of working them now or in the future. This should be clarified with the operators. It is therefore not correct to say there is active working within the VoG at Forest Wood Quarry.</p> <p><b>8.26</b> – It is understood that a high proportion of the reserves at the adjacent Garwa Farm and quarry are industrial minerals. These should not be included within the aggregate landbank.</p> <p><b>8.26 and 8.27</b> – There should be clarification as to which of the sites listed are ‘dormant’ in the context of the Environment Act 1995 or the Planning and Compensation Act 1991 and require the submission of an application and ES before working could be resumed. The reference in 8.27 to the listed sites having been inactive for more than 10 years is informative in a general sense, but not relevant in the context of dormancy.</p> <p><b>Figure 8.5</b> – This map would benefit from the sites listed in the above paragraphs being numbered with corresponding annotation on the map.</p>	
Natural Resources Wales	<p>On the interlinked climate and nature emergencies, key considerations for which assessment of the Plan might helpfully address include:</p> <ul style="list-style-type: none"> <li>• Whether the Plan’s cumulative development and land-use proposals bring appropriate biodiversity benefits [to help halt and reverse the decline in nature and maintain areas already rich in biodiversity] with no unacceptable [direct or indirect] impact or damage to habitats and species, and whether the Plan acts to enhance natural capital rather than deplete it?</li> <li>• Whether the Plan’s development and land-use proposals are individually and cumulatively compatible with the scale and pace of decarbonisation and sequestration needed to remain aligned with the Paris Agreement and Welsh carbon budgets (to 2030) and targets through to the end of the plan period (near 2040)?</li> <li>• Whether the Plan’s proposals to adapt the built environment to the predicted effects of climate change and address other key sustainability issues are comprehensive and meet the needs of current generations, without compromising the ability of future generations to meet theirs?</li> </ul> <p>The ISA process also offers your Authority an approach to assess and identify likely significant effects of emergency measures to tackle the climate and nature crisis: <a href="#">Natural Resources Wales/ State of Natural Resources interim report 2019: Challenges</a>.</p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
Natural Resources Wales	<p>We are happy with the approach of integrating assessment processes and, once available, we would welcome the findings of the Habitats Regulations Assessment informing the process as well. However, the ISA will need to meet the requirements of an 'Environmental Report' under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA (Strategic Environmental Assessment) Regulations).</p> <p>Identifying the sections of the ISA which will comprise the Environmental Report and detailing the methodology for its preparation would be helpful to demonstrate this.</p>	Thank you, comment noted – this will be considered through the ISA process.
Natural Resources Wales	<p>The proposed objective-led methodology comprises an assessment framework of ninety-two assessment questions, to identify the nature, type, duration and significance of effects for sixteen sustainability objectives across the ten ISA themes. Such an approach will require extensive reporting of justification for each element of the plan assessed. In the context of the SEA Regulations, it would be helpful to provide more detail on how the significance of effects will be identified (<a href="#">The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004</a>).</p>	Thank you, comment noted – detailed methodology be provided through the next stage of ISA.
Natural Resources Wales	<p>Where possible, the assessment questions might helpfully be linked with evidence/ information or else noted evidence gaps so that assessments may be repeatable. Consideration should also be given to the relative significance of the assessment questions (weighting) to the assessment made.</p>	Thank you, comment noted – this will be considered through the ISA process.
Natural Resources Wales	<p>As significant detail is available for some ISA themes, you may wish to consider alternative means of assessment which could reduce the overall number of assessment questions to be answered. These might include modelling, environmental receptor led approaches and mapping and spatial analysis.</p>	Thank you, comment noted – this will be considered through the ISA process.
Natural Resources Wales	<p>We also note the ISA does not propose to scope out any matters. Identifying where significant environmental effects are likely to arise helps focus the scale of assessment required and enables the assessment to focus on the most significant topics that are likely to be impacted by the LDP.</p> <p>If it can be shown that significant environmental effects on specific elements of the environment are unlikely, these elements can be scoped out and removed from the assessment. For those scoped out, a concise and reasoned justification is necessary, and provides a useful audit trail.</p>	Thank you, comment noted – this will be considered through the ISA process.

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	<p>Identifying other relevant plans, programmes and strategies and environmental protection objectives, and baseline information, relevant environmental issues, and future trends.</p> <p>A tightly scoped assessment ensures proportionate, cost effective and fit for purpose reporting of the significant issues in a concise manner, making them clear to stakeholders and decision makers.</p>	
Natural Resources Wales	<p>As a starting point for the assessment, the objectives of the LDP (as noted in the Review Report) should be used to help focus the identification of relevant plans, programmes, and strategies (PPS), and environmental protection objectives.</p> <p>This would enable a more specific focus on where, how, and when they might be achieved and, with reference to the context provided by PPS and baseline data and trends, what the likely significant environmental effects of the Plan could be.</p>	Thank you, comment noted – this will be considered through the ISA process.
Natural Resources Wales	<p>Having selected ISA themes, it would be helpful to identify how they relate to the matters to be addressed in the Environmental Report, the planning context set by Future Wales' 11 Outcomes and the four aims of the sustainable management of natural resources (SMNR):</p> <ul style="list-style-type: none"> <li>• Aim 1: Stocks of natural resources are safeguarded and enhanced</li> <li>• Aim 2: Ecosystems are resilient to expected and unforeseen change</li> <li>• Aim 3: Wales has healthy places for people, protected from environmental risks</li> <li>• Aim 4: Contributing to a regenerative economy, achieving sustainable levels of production and consumption</li> </ul>	Thank you, comment noted – this will be considered through the ISA process.
Natural Resources Wales	<p>The sections for each ISA theme present a lot of information on the context provided by relevant plans programmes and strategies, however because the scoping report does not present LDP objectives, we question whether the information is appropriately focussed on the likely significant effects that could influence or be influenced by the LDP? And, given the scale of the analysis provided, whether it presents the policy context accurately and aligns with that presented in the <a href="#">second Well-being Assessment undertaken by the Vale of Glamorgan Public Services Board (PSB)</a>?</p>	<p>Thank you, comment noted – the LDP objectives alongside the ISA objectives will be presented in through the next stage of ISA.</p> <p>The VoG's second Wellbeing Assessment is considered as part of the evidence base supporting the ISA process.</p>
Natural Resources Wales	<p>Baseline information enables environmental effects to be predicted and monitored and for environmental problems and alternative ways of dealing with them to be identified. At scoping stage, it is important to provide sufficient information to provide an understanding of the likely significant environmental effects of the LDP on the required environmental topics, and the inter-relationship between them.</p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
	<p>This includes information which characterises the areas affected by the LDP, and which enables consideration of whether trends demonstrate that existing LDP is achieving or moving towards or away from targets and critical thresholds. Such trend analysis can help to highlight existing and potential future environmental problems.</p> <p><a href="#">Natural Resources Wales / State of Natural Resources Report (SoNaRR) for Wales 2020</a> provides an evidence base and sets out how the sustainable management of natural resources help address the problems of climate change, pollution and biodiversity loss by building ecosystem resilience and securing the ecosystem benefits we receive from them.</p> <p>When presenting baseline information, the use of maps, graphs, diagrams, and other visual forms of representation helps make the data easier to understand and we welcome their use throughout. Any issues with the quality of, or gaps in the baseline should be acknowledged.</p>	
Natural Resources Wales	<p>To ensure evidence-based decisions, we suggest all sources, forms and avenues of sound information are explored and, where relevant, incorporated within the assessment. Whilst the range of PPS reviewed is significant, data sources are not as clearly presented. For each ISA theme, a table like those provided for PPS, but detailing the baseline information used, including that drawn from the Plan's evidence base (data or evidence), would be helpful. Our data and spatial information are available from Data Map Wales <a href="#">Home   DataMapWales (gov.wales)</a>.</p>	Thank you, comment noted – data sources are referenced throughout the scoping report.
Natural Resources Wales	<p>We advise reviewing the key issues sections to express them with a greater focus on place and to ensure they align with the baseline, or else provide further explanation of the decision-making process for their selection and prioritisation. Furthermore, the key issues can demonstrate key linkages, for example improving the amount and quality of accessible open space and Green Infrastructure offers potential for significant positive effects across many topics, including human health, landscape, and biodiversity.</p>	Thank you, comment noted – the next stage of ISA will identify key scoping issues along with RDLP key issues and objectives. The relationship between key issues/ themes (including cumulative effects) will also be considered through the next stage of the ISA process.
Natural Resources Wales	<p><b>Climate change (mitigation and adaptation)</b></p> <p>The analysis draws from UK local authority and regional greenhouse gas emissions national statistics – GOV.UK (<a href="http://www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics">www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics</a>), yet there is no detailed discussion of pathways demonstrating the Plan's contribution to meeting budgeted (2030) and target emissions reduction by the end of the plan period (near 2040).</p>	Thank you, comment noted – relevant context and baseline information will be considered through the next stage of ISA. Notably this includes the consideration of coastal flooding and use of the Flood Risk Assessment Wales (FRAW) map and FMfP.

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The Tyndall Carbon Budget Tool ([carbonbudget.manchester.ac.uk](https://carbonbudget.manchester.ac.uk)) and Welsh reports of the Climate Change Committee ([theccc.org.uk](https://theccc.org.uk)) may assist with defining an appropriate pathway and the Plan's contribution to it. Relevant to considering the Plan's contribution may be embodied and operational emissions models referenced in this article: [A home for all within planetary boundaries: Pathways for meeting England's housing needs without transgressing national climate and biodiversity goals - ScienceDirect](#)

We welcome the report's referencing of the Third UK Climate Change Risk Assessment and consider the Technical Report Summary for Wales ([ukclimaterisk.org](https://ukclimaterisk.org)) sets out relevant risks and opportunities of relevance to the in-combination assessment of the Plan's likely significant effects. These risks should be presented clearly in the key issues section.

Regarding **flood risk**, we note that although it is very high-level report, the general principles appear to reflect the broad aims of [Technical advice note \(TAN\) 15: development, flooding and coastal erosion | GOV.WALES](#) (to be introduced in 2023) and reference is made to the Flood Map for Planning (FMfP) and Strategic Flood Consequences Assessment (SFCA) requirements. We welcome the statements referring to the avoidance of new development within areas of flood risk and the need to consider resilience to counter the likely future effects of Climate Change. Addressing flood risk, maintaining the resilience of engineered defences, and promoting all means of mitigation are significant issues in the planning area.

We note the plan showing fluvial flood risk, however, as recognised in the text, coastal flooding is also a risk and consider it would be helpful to show this in a comparable way. You may wish to use the SFCA, which will be the principal source of evidence to inform the plan and locally specific flood risk policies, to inform the ISA assessment of flood risk.

We also suggest that Table 6.1 refers to the Welsh Government guidance [Climate change allowances and flood consequence assessments | GOV.WALES](#), [draft FCERM climate change guidance 2021 \(gov.wales\)](#) and [Natural Resources Wales / Flood and coastal erosion risk management research and development](#).

Regarding paragraph 6.3 (bullet point 5) please note the Flood Map for Planning is already publicly available and relevant for LDPs. The 'Wales Flood Map' is not a separate map as

Respondent	Consultation Response	AECOM Response
	<p>suggested, it is an overarching term for the Flood Risk Assessment Wales (FRAW) map and FMfP.</p> <p>Evidence is available in the Communities at Risk Register Lle - Communities at Risk Register (CaRR) (<a href="http://gov.wales">gov.wales</a>). UKCP (UK Climate Projections) 18 projections are now available to inform our work <a href="#">UK Climate Projections (UKCP) - Met Office</a>. Also significant will be our Flood Risk Management Plan and Programme and Dwr Cymru's Drainage and Wastewater Management Plan   Dŵr Cymru Welsh Water (<a href="http://dwrcymru.com">dwrcymru.com</a>). In addition to the Section 19 flood investigations noted, our review of our response to Storm Ciara and Dennis (<a href="#">Natural Resources Wales/ February 2020 flood review (Storm Ciara and Dennis)</a>) is relevant.</p>	
Natural Resources Wales	<p><b>Biodiversity and geodiversity</b></p> <p>There should be a stronger emphasis on the Section 6 Duty which requires public authorities, in carrying out their functions, to 'seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions'.</p> <p>Whilst the ISA refers to connections between habitats (in paragraph 9.33), other elements of the 'DECCA (Diversity, Extent, Condition, Connectivity and Adaptability)' approach to ecosystem resilience are not addressed (see: Ecosystem Resilience in a Nutshell 1: what is ecosystem resilience? (<a href="http://cyfoethnaturiol.cymru">cyfoethnaturiol.cymru</a>)).</p> <p>We advise reviewing the section to ensure key messages from Future Wales Policy 9: Resilient Ecological Networks and Green Infrastructure, SoNaRR2020 <a href="#">Natural Resources Wales/ SoNaRR2020: Ecosystems are resilient to expected and unforeseen change</a> and priorities in the Natural Resources Policy are communicated appropriately. The precision of the wording throughout this section should be reviewed. For example, it refers to biodiversity net gain rather than net benefits, and one of the assessment questions omits the 'avoid' stage, before accepting and minimising impacts.</p> <p>We know that protected sites alone, even in favourable condition, won't be enough for nature recovery and continued provision of ecosystem services. One of the ways to build ecosystem resilience is to consider their function at a landscape scale. In policy, this is referred to as Resilient Ecological Networks and they are mentioned in the <a href="#">Wales Nature Recovery Action Plan</a>, <a href="#">Natural Resources Policy</a> and <a href="#">Nature Positive 2030</a>. More recently they have been referred to as <a href="#">Nature Networks</a> for the purposes of Welsh Government funding.</p>	<p>Thank you, comment noted – relevant context and baseline information will be considered through the next stage of ISA. Notably this includes consideration of Relevant Candidate Resilient Ecological Networks and associated guidance.</p> <p>The ISA framework objective will be revised to include reference to the 'avoid' stage.</p>

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The NRW Resilient Ecological Network guidance for practitioners (Garrett & Ayling 2021) says: *“Resilient Ecological Networks, or Nature Networks, are networks of habitat in good ecological condition linking protected sites and other biodiversity hotspots across the wider landscape, providing maximum benefit for biodiversity and well-being. Such networks have existing or potential for healthy resilient ecosystems, which provide a range of important ecosystem services, as well as allowing the movement of species across landscapes in response to climate change and disruptive events. The maintenance, enhancement or re-creation of Resilient Ecological Networks are vital for nature recovery.”*

For the Vale of Glamorgan, this approach can support the council’s declared nature emergency (July 2021), and the Vale of Glamorgan Local Nature Partnership and local Nature Recovery Action Plan (in development). Relevant Candidate Resilient Ecological Networks in development are ‘Glamorgan coast,’ ‘Thaw catchment,’ ‘Barry & Dinas Powys woodlands,’ ‘Alun valley,’ ‘Border vale rhos pasture’ and ‘Cog (cuckoo) moors.’

The condition of protected sites is reported in the baseline assessment ([Natural Resources Wales / Protected sites baseline assessment 2020](#)). Other relevant information includes [Natural Resources Wales / SoNaRR2020: Biodiversity assessment](#) and UK biodiversity indicators ([jncc.gov.uk](#)). The State of Nature partnership’s The State of Nature 2019 report ([nbn.org.uk](#)) provides national trend information. Pressures on SACs (Special Areas of Conservation) are identified in reports of the [Life N2K Programme](#) and in Core Management Plans. We would be happy to explore with any more detailed information requirements you have regarding Sites of Special Scientific Interest.

The Nature recovery action plan | GOV.WALES outlines national actions; identifying and scoping relevant s7 species for the assessment would benefit for discussions with the Local Nature Partnership Wales Biodiversity Partnership - Vale of Glamorgan ([biodiversitywales.org.uk](#)). Further records on ‘s7 species’ are held by the Local Environment Records Centre ([lercwales.org.uk](#)).

Natural Resources  
Wales

**Economy and employment**

The prosperous Wales national well-being goal encourages ‘inclusive growth’ which involves sharing the benefits of economic growth more equitably. This is helpfully considered in [A Prosperous Wales – The Future Generations Commissioner for Wales](#) which may contribute to the policy context. The Final Report - The Economics of Biodiversity: The Dasgupta Review -

Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
	<p>GOV.UK (<a href="http://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review">www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review</a>) also contributes to the policy context. In pursuing sustainable development and the well-being economy towards sustainable prosperity, rather than growth alone, it is important to consider 'Multi-Factor Productivity' (suitably adjusted for properly defined natural capital including the biological cycle that generates final ecosystem goods and services) and the measure of 'Net Value Added' after the necessary re-investment in the capital stocks sustaining the flow of goods and services measured by GVA (Gross Value Added) is made.</p>	
<p>Natural Resources Wales</p>	<p><b>Transportation</b></p> <p>Urban transport contributes to carbon emissions, air, water, and noise pollution and leads to the social and economic impacts associated with congestion and lack of transport opportunities. <a href="#">Natural Resources Wales / SoNaRR2020: Transforming the transport system</a> highlights that the mobility sub system favours a polycentric approach within the urban boundary based upon a 20-minute neighbourhood approach, with equal status being given to modal choices based upon walking or cycling. How people and goods are transported generates significant negative impacts on ecosystems and human health and is explored in the wellbeing assessment. From the analysis presented, key issues would appear to include the reported congestion related to 'school drop off', commuting levels between the Vale of Glamorgan and Cardiff and the current levels of provision of active travel infrastructure.</p> <p>Traffic count point information is available (Road traffic statistics - Download data (<a href="http://dft.gov.uk">dft.gov.uk</a>)) and might helpfully provide a source of trends and monitoring information. Noted as part of the transportation infrastructure, the Rights of Way Improvement Plan (ROWIP) (<a href="http://valeofglamorgan.gov.uk">valeofglamorgan.gov.uk</a>) might also help by providing information relating to the use and condition of the network.</p>	<p>Thank you, comment noted – this will be considered through the ISA process.</p>
<p>Natural Resources Wales</p>	<p><b>Natural resources (air, land, minerals, and water)</b></p> <p>Whilst we welcome the inclusion of land as a natural resource, we question why the ISA defines natural resources as air, land, minerals, and water? The Environment Wales Act 2016 consider Natural Resources as including (but not limited to)</p> <ul style="list-style-type: none"> <li>• animals, plants and other organisms</li> <li>• air, water and soil</li> <li>• minerals</li> <li>• geological features and processes</li> <li>• physiographical features</li> </ul>	<p>Thank you, comment noted – natural resources defined to where possible avoid overlap with other ISA themes, i.e. biodiversity and climate change.</p> <p>Relevant baseline updates and context/evidence will be considered through the next stage of ISA.</p> <p>ISA objective revised so as not to be limited to greenfield land.</p>

Respondent	Consultation Response	AECOM Response
	<ul style="list-style-type: none"> <li>climatic features and processes</li> </ul> <p>The <a href="#">Natural resources policy   GOV.WALES</a> outlines priorities for natural resources which might helpfully be reflected as locally defined key issues for the LDP, alongside the themes of the <a href="#">Natural Resources Wales / South Central Wales Area Statement</a> and Ecosystem Profiles <a href="#">Natural Resources Wales / Building resilient ecosystems</a>.</p> <p>One priority of the Natural Resources Policy is delivering nature-based solutions with examples of this including increasing green infrastructure in and around urban areas; coastal zone management and adaptation (two shoreline management plans are relevant to the Vale of Glamorgan - <a href="#">Severn Estuary Coastal Group</a> (Shoreline Management Plan 19 – Anchor Head to Lavernock Point) and <a href="#">South Wales Coastal Group</a> (Shoreline Management Plan 20 – Lavernock Point to St Anne’s Head); increased canopy cover and well-located woodland, for example close to towns and cities where it will have the greatest recreational and ecosystem service value; and maintaining, enhancing and restoring floodplains and hydrological systems to reduce flood risk and improve water quality and supply.</p> <p>Regarding air pollution, although not a key issue identified in the ISA, the Local Well-being Assessment notes “<i>Atmospheric nitrogen pollution is considered a major threat to biodiversity, leading to impacts including the loss of sensitive species of plants, lichens and animals, as well as having significant implications for public health.</i>” <a href="#">Guidance to inform the assessment of air quality impacts on designated sites is available</a> <a href="#">Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report   JNCC Resource Hub</a>. Further data is available from the <a href="#">Air Pollution Information System   Air Pollution Information System (apis.ac.uk)</a>.</p> <p>Regarding water abstraction the report notes at paragraph 8.10 that at low flow the River Cadoxton is currently identified as over-abstracted, however the analysis in paragraph 8.35 explains that “...<i>Wales and more specifically the Vale of Glamorgan area is not anticipated to have issues relating to water resources...</i>” and over-abstraction is not noted as a key issue in paragraph 8.39.</p> <p>Our CAMs (Catchment Abstraction Management Strategy) documents outline how much water is available in a catchment for licensing purposes. The <a href="#">Thaw and Cadoxton Abstraction Licensing Strategy – May 2015 (cyfoethnaturiol.cymru)</a> explain the availability of water for abstraction is determined by the relationship between the Catchment Abstraction Management</p>	

Respondent	Consultation Response	AECOM Response
	<p>Strategy (CAMS) fully licensed (FL) scenario and the CAMS recent actual (RA) scenario in comparison to the needs of the environment defined by the Environmental Flow Indicator (EFI), and whether there is an environmental flow deficit or a risk of a deficit. The EFI is a proportion of the natural flow in a river that is set aside for the ecological health of the water course. This is used to prevent ecological deterioration of the rivers; it is set in line with standards set by UKTAG.</p> <p>Regarding groundwater quality and resource protection, this will mainly be linked with (but will not be limited to) drainage. Our approach for the protection of groundwater is set out in Groundwater protection position statements - GOV.UK (<a href="http://www.gov.uk/">www.gov.uk/</a>). We welcome the ISA identifying the source protection zones and carboniferous limestone aquifer that provide an important natural resource and the wording of the relevant ISA objective in section 8.4. The report should also recognise groundwater as a resource in its own right and seek to protect it with regards to quality and quantity.</p> <p>We also support the consideration of prioritising previously developed land being brought into beneficial use. Relevant guidance and information is available from the <a href="http://WaterandLandLibrary(WALL)(claire.co.uk)">Water and Land Library (WALL) (claire.co.uk)</a>. Proposals which protect and enhance natural resources and habitats can also be achieved on previously developed land, therefore we advise this objective this is not limited to greenfield land. We welcome the wording of the relevant ISA objective in section 8.4. We are aware some of the areas mentioned within the ISA (enterprise zones including Cardiff airport, aerospace business parks, including further development of Barry) are associated with land contamination and will advise upon sustainable remediation if taken forward.</p> <p>There are many other pressures driving land use change, relevant evidence may be drawn also from the Environment and Rural Affairs Monitoring &amp; Modelling Programme (ERAMMP) <a href="#">ERAMMP</a>. Regarding soil, relevant information may be accessed from the <a href="#">national soils evidence programme</a> (gov.wales).</p>	
Natural Resources Wales	<p><b>Historic environment</b></p> <p><a href="http://HistoricWales(arcgis.com)">Historic Wales (arcgis.com)</a>, which links to the <a href="#">Coflein - The online catalogue of archaeological sites, historic buildings, industrial and maritime heritage in Wales</a> and Historic Environment Record (<a href="#">Archwilio-the searchable database of the Welsh Archaeological Trusts</a>) provide information on a wide range of designations relevant to the assessment.</p>	Thank you, comment noted – this will be considered through the ISA process.

Respondent	Consultation Response	AECOM Response
Natural Resources Wales	<p><b>Landscape</b></p> <p>We welcome the references to NLCA (National Landscape Character Areas), MCA (Marine Character Areas) and Special Landscape Areas (SLA) which can help inform well designed place responsive, developments which make a positive contribution to their locality along other landscape planning and design techniques that a Landscape Architect would apply.</p> <p>We note the focus is on landscape and townscape resource conservation, however a well-designed scheme can integrate well with sensitive natural and built environments, or create a new positive identity where character is currently poor where good place responsive design is achieved. However, this relies on appropriate policy embracing placemaking principles, and the design process set out in Technical Advice Note 12: Design (2016) being implemented. If either the policy or implementation are weak, development can have an adverse impact.</p> <p>Existing and proposed landscape features (we use this term broadly to include important natural and built heritage features) are both a conservation resource and a positive contributor to character, distinctiveness, place making and environmental functions of a place. They provide opportunities to deliver multiple benefits (multifunctional landscapes within development sites) including for health and well-being, water management and biodiversity.</p> <p>Site context, the presence of landscape features and design strategy impact the “<i>developable area</i>” and inform judgements about viability from a sustainable policy perspective, a developer’s economic perspective and provides a realistic calculation of housing numbers the site has capacity for, and therefore the number of sites eventually needed to be allocated within the LDP.</p> <p>Landscape sensitivity assessments are a valuable tool to help guide development to the least sensitive locations in the initial stages of spatial planning before individual development proposals come forward on specific development sites (<a href="#">landscape-sensitivity-assessment-guidance-for-wales.pdf (cyfoethnaturiol.cymru)</a>). The findings of such a study, would helpfully inform the Environmental Report of the LDP. Nevertheless, if the objective led methodology is to be used, we consider the following amendments/ additional wording would be helpful.</p> <p><b>ISA objective</b> (suggested additional wording in bold): To protect and enhance the quality and character of Vale of Glamorgan’s landscape, seascape, and townscapes, <b>through conservation, placemaking and design principles.</b></p>	<p>Thank you, comment noted – baseline information and relevant context will be considered through the next stage of the ISA process.</p> <p>ISA objective and assessment questions updated to include conservation, placemaking and design principles.</p>

**Respondent****Consultation Response****AECOM Response****Assessment questions. Will the policy/ proposal help to:**

- Enable landscape, townscape, and previously developed land to be revitalised by enhancing character, distinctiveness, environmental and wellbeing functions? (Add as new question after first bullet point)
- Ensure that sites in open countryside are only considered for allocation/development where existing natural landscape features (with minor additional mitigation) provide good visual integration of development within local and more distant landscape views? (A reframing of the second question, to make the point about locating development where landscape has best capacity to absorb it without negative effects on character)
- Ensure a high standard of building design, appearance, integration and placemaking is enabled, with particular attention to site frontages, edges facing open countryside, gateways to settlements and in creating attractive places for existing and new communities? (Add as new question)
- Ensure the existing natural and built heritage features of the site are conserved and are factored into a site's capacity and design strategy for development? (Add as new question)
- Ensure the area necessary to provide public amenity and wellbeing through Public Open Space, Sustainable Drainage, steppingstone/strategic Green Infrastructure, and active travel routes are delivered (Add as new question).

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# Revised ISA Framework

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
<b>Economy and employment</b>	Support a sustainable, diverse, and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	<ul style="list-style-type: none"> <li>• Provide sufficient land for businesses to grow and ensure alignment with housing/infrastructure?</li> <li>• Support the creation of accessible new jobs and facilitate home and distance working?</li> <li>• Support the Cardiff Airport and Bro Tathan Enterprise Zone, reflecting its regional importance in terms of attracting inward investment?</li> <li>• Ensure that town centres are considered first for new commercial, retail, education, health, leisure and public service facilities?</li> <li>• Ensure the capacity of educational facilities keep pace with population growth?</li> <li>• Enhance the vitality and resilience of town centre and retail centres, supporting diversification in line with changing needs?</li> <li>• Safeguard existing employment areas?</li> <li>• Create an attractive tourism destination?</li> <li>• Encourage sustainable development and quality facilities to enrich the experience for visitors and residents?</li> <li>• Promote a green economy and decarbonisation?</li> <li>• Ensure the economy grows in a sustainable manner?</li> </ul>	<ul style="list-style-type: none"> <li>• A Prosperous Wales</li> <li>• A Resilient Wales</li> <li>• A More Equal Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Globally Responsible Wales</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
<b>Population and communities</b>	To provide enough good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	<ul style="list-style-type: none"> <li>• Promote a prosperous Wales?</li> <li>• Meet the identified housing needs, including affordable, older person housing and accommodation needs of gypsy traveller community?</li> <li>• Ensure an appropriate mix of dwelling sizes, types, and tenures to meet the needs of all sectors of the community, particularly the rapidly growing older population?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> <li>• Promote transit orientated development such as the 20-minute neighbourhood?</li> <li>• Promote the development of a range of high quality, accessible community facilities, including specialist services?</li> </ul>	<ul style="list-style-type: none"> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Wales of Vibrant Culture and Thriving Welsh Language</li> </ul>
	To enhance design quality to create natural beautiful places for people that maintain and enhance community and settlement identity.	<ul style="list-style-type: none"> <li>• Improve connectivity between communities and facilitate social interaction?</li> <li>• Promote the development of a range of high quality, accessible community facilities, including specialist services?</li> <li>• Protect and enhance community identity and distinctiveness and support opportunities for recreation and tourism?</li> <li>• Prevent the coalescence of settlements and retain the openness of land, green infrastructure and habitat connectivity?</li> </ul>	<ul style="list-style-type: none"> <li>• A Prosperous Wales</li> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Wales of Vibrant Culture and Thriving Welsh Language</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
<b>Health and wellbeing</b>	To improve the health and wellbeing of residents within Vale of Glamorgan promoting healthy and sustainable places.	<ul style="list-style-type: none"> <li>• Encourage healthy lifestyles and reduce health inequalities through provision of open space, play spaces, food growing, and community spaces?</li> <li>• Facilitate good access to healthcare, social, recreational and leisure facilities for all sectors of the community?</li> <li>• Enhance multifunctional green infrastructure networks and connectivity throughout the plan area?</li> <li>• Provide and enhance the provision of community access to green spaces?</li> <li>• Improve access to open spaces, the countryside and leisure and recreation facilities?</li> <li>• Support healthy / active and inclusive environments?</li> <li>• Support the creation of cohesive, connected communities?</li> <li>• Provide formal and informal, and natural play spaces for children which are safe and easy and safe to access?</li> <li>• Reduce health inequalities across the County?</li> <li>• Support active travel and improvements to air quality?</li> </ul>	<ul style="list-style-type: none"> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Wales of Vibrant Culture and Thriving Welsh Language</li> </ul>
<b>Equality, diversity and inclusion</b>	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	<ul style="list-style-type: none"> <li>• Reduce inequalities and deprivation across the Vale of Glamorgan, particularly in the most deprived wards and hidden areas of deprivation?</li> <li>• Improve equality of opportunities amongst those social groups most in need?</li> </ul>	<ul style="list-style-type: none"> <li>• A Prosperous Wales</li> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
<b>Climate change</b>	Support the resilience of Vale of Glamorgan to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	<ul style="list-style-type: none"> <li>• Contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods?</li> <li>• Promote, strengthen, and enhance placemaking?</li> <li>• Protect and provide improved local, social, recreational and leisure facilities and access to the natural environment for all sectors of the community, and improve access to them to maximise opportunities for community development and social welfare?</li> <li>• Ensure an appropriate mix of dwelling sizes, types, and tenures to meet the needs of all sectors of the community?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> <li>• Promote the Vale’s bilingual public services and increase the development and use of the Welsh language in Vale of Glamorgan?</li> <li>• Support the ageing population to ensure they do not become socially excluded?</li> </ul> <ul style="list-style-type: none"> <li>• Avoid development in areas at risk of flooding, considering the likely future effects of climate change?</li> <li>• Increase resilience of the built and natural environment to the effects of climate change particularly in areas where coastal and fluvial flooding is identified?</li> <li>• Ensure that the potential risks associated with climate change are considered in new development in the plan area?</li> </ul>	<ul style="list-style-type: none"> <li>• A Wales of Cohesive Communities</li> <li>• A Wales of Vibrant Culture and Thriving Welsh Language</li> <li>• A Globally Responsible Wales</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Globally Responsible Wales</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
		<ul style="list-style-type: none"> <li>• Protect, improve and extend green infrastructure networks in the plan area to support climate change adaptation?</li> <li>• Utilise green infrastructure to sustainably manage water run-off, reducing surface water runoff, whilst creating opportunities for habitat creation, tree planting and open spaces?</li> <li>• Minimise flood risk for key infrastructures, such as transport and power?</li> </ul>	
	<p>Reduce Vale of Glamorgan’s contribution to climate change from activities which result in greenhouse gas emissions and contribute to meeting the Council’s target of net zero.</p>	<ul style="list-style-type: none"> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Reduce energy consumption from non-renewable sources?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce the need to travel or the number of journeys made?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Ensure rural development does not contribute towards further increases in high energy use and unsustainable travel?</li> </ul>	<ul style="list-style-type: none"> <li>• A Prosperous Wales</li> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Globally Responsible Wales</li> </ul>
<p><b>Transport and movement</b></p>	<p>Increase sustainable transport use and reduce the need to travel.</p>	<ul style="list-style-type: none"> <li>• Reduce the need to travel through sustainable patterns of land use and development?</li> <li>• Provide opportunities to improve frequency and availability of public transport services particularly for rural communities?</li> </ul>	<ul style="list-style-type: none"> <li>• A Prosperous Wales</li> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
		<ul style="list-style-type: none"> <li>• Encourage modal shift to more sustainable and active forms of travel, such as walking and cycling and use of public transport?</li> <li>• Support opportunities for modal shift as set out in the South Wales Metro Project?</li> <li>• Prioritise sustainable transport options over car use where possible, including provision of adequate cycle parking and storage options?</li> <li>• Enable transport infrastructure improvements?</li> <li>• Deliver and where necessary improve active travel networks?</li> <li>• Support the uptake of low carbon transport such as E-bikes and electric buses?</li> <li>• Contribute towards the EV charging network?</li> <li>• Facilitate working from home and remote working?</li> <li>• Provide improvements to and/ or reduce congestion on the existing highway network?</li> <li>• Contribute to green infrastructure networks?</li> </ul>	<ul style="list-style-type: none"> <li>• A Wales of Cohesive Communities</li> <li>• A Globally Responsible Wales</li> </ul>
<b>Natural resources</b>	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	<ul style="list-style-type: none"> <li>• Reduce the need to travel?</li> <li>• Encourage journeys to be made by sustainable means (active travel or public transport)?</li> <li>• Avoid any adverse effects on air quality and for people exposed to poor air quality?</li> <li>• Improve air quality in areas identified as of concern?</li> <li>• Promote and facilitate the use of electric vehicles?</li> <li>• Promote good design to avoid impacts on air quality and noise reduction and protects,</li> </ul>	<ul style="list-style-type: none"> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Globally Responsible Wales</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
		incorporates and enhances green infrastructure networks to facilitate increased absorption and dissipation of NO2 and other pollutants?	
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	<ul style="list-style-type: none"> <li>• Minimise the loss of potentially high-grade agricultural land to developments?</li> <li>• Protect and minimise loss of the soil resource and encourage appropriate management to enhance its carbon sequestration and water management functions?</li> <li>• Encourage the use of previously developed land?</li> <li>• Encourage development-related remediation works which could reduce the presence of contaminated land in Vale of Glamorgan?</li> </ul>	<ul style="list-style-type: none"> <li>• A Resilient Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Globally Responsible Wales</li> </ul>
	<u>To protect mineral resources and ensure that an adequate supply of a diverse range of minerals is available over the long-term.</u>	<ul style="list-style-type: none"> <li>• <u>Avoid the sterilisation of mineral resources where possible?</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>A Resilient Wales</u></li> <li>• <u>A Globally Responsible Wales</u></li> </ul>
	<del>To protect mineral resources and support</del> <u>Support</u> waste management.	<ul style="list-style-type: none"> <li>• Address waste by reducing and minimising waste as a priority?</li> <li>• Manage waste in accordance with the waste hierarchy and in the context of ‘Towards Zero Waste’?</li> <li>• <del>Avoid the sterilisation of mineral resources where possible?</del></li> </ul>	<ul style="list-style-type: none"> <li>• A Resilient Wales</li> <li>• A Globally Responsible Wales</li> </ul>
	To conserve, protect and enhance the	<ul style="list-style-type: none"> <li>• Reduce water consumption?</li> </ul>	<ul style="list-style-type: none"> <li>• A Resilient Wales</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
	water environment, water quality and water resources.	<ul style="list-style-type: none"> <li>• Ensure an adequate supply of water can be provided to sustain the development considering current and future projections of water availability and water use?</li> <li>• Reduce the potential for contamination of waterbodies and courses?</li> <li>• Reduce the potential for agricultural practices to contribute towards nitrate-based pollution of waterbodies and courses?</li> </ul>	<ul style="list-style-type: none"> <li>• A Globally Responsible Wales</li> </ul>
<b>Biodiversity and geodiversity</b>	Protect and enhance biodiversity within and surrounding Vale of Glamorgan.	<ul style="list-style-type: none"> <li>• <del>Avoid, minimise, and restore, to impacts on designated and important biodiversity features</del> <u>reduce, as far as possible, any residual impact on biodiversity?</u></li> <li>• <del>and provide net gains/benefits</del> where possible?</li> <li>• Protect and enhance ecological networks, including those that cross administrative boundaries?</li> <li>• Support opportunities for green infrastructure, which have knock-on benefits for wildlife, connecting habitats and avoiding habitat fragmentation?</li> </ul>	<ul style="list-style-type: none"> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> <li>• A Globally Responsible Wales</li> </ul>
<b>Historic environment</b>	Preserve and enhance Vale of Glamorgan’s heritage resource, including its historic environment and archaeological assets.	<ul style="list-style-type: none"> <li>• Preserve and enhance the significance of buildings and structures of architectural and/ or historic interest, both designated and non-designated, and their setting?</li> <li>• Preserve and enhance the special interest, character and appearance of conservation areas and their settings?</li> </ul>	<ul style="list-style-type: none"> <li>• A Prosperous Wales</li> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A Wales of Cohesive Communities</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
	Promote understanding of Vale of Glamorgan’s cultural heritage.	<ul style="list-style-type: none"> <li>• Conserve and enhance archaeological remains, and archaeologically sensitive areas, and support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?</li> <li>• Support access to, interpretation and understanding of the historic and cultural environment, including the Welsh language?</li> </ul>	<ul style="list-style-type: none"> <li>• A Wales of Vibrant Culture and Thriving Welsh Language</li> <li>• A Globally Responsible Wales</li> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Wales of Vibrant Culture and Thriving Welsh Language</li> <li>• A Globally Responsible Wales</li> </ul>
<b>Landscape</b>	To protect and enhance the quality and character of Vale of Glamorgan’s landscape, seascape and townscape.	<ul style="list-style-type: none"> <li>• Ensure that Vale of Glamorgan’s most valuable landscapes, townscapes and seascapes are conserved and enhanced?</li> <li>• Use new and existing natural landscape features to mitigate any potential effects on nearby and distance interpretations of its landscapes?</li> <li>• Provide opportunities for linking existing fragmented woodland, introduction of new woodland, improving woodland and hedgerow management</li> <li>• Preserve and enhance the special interest, character and appearance of the Glamorgan Heritage Coast and its setting?</li> </ul>	<ul style="list-style-type: none"> <li>• A Prosperous Wales</li> <li>• A Resilient Wales</li> <li>• A Healthier Wales</li> <li>• A More Equal Wales</li> <li>• A Wales of Cohesive Communities</li> <li>• A Wales of Vibrant Culture and Thriving Welsh Language</li> </ul>

Theme	ISA objective	Assessment questions – will the plan/ policy help to:	Relevant wellbeing goals
			<ul style="list-style-type: none"><li>• A Globally Responsible Wales</li></ul>

Body text