

Annex I: Scoping Report Consultation Responses

Rep. No.	Name and Organisation/ Department	Summary of Comment <i>(refer to NCC consultation database for full text)</i>	Response	Action
36	Cadw	<p>pp72 Obj. 19</p> <p>Content with overall objective. Request addition of objectives relating to condition of Scheduled Ancient Monuments (SAMs); and objective relating to historic parks and gardens.</p> <p>Request that phrasing of objectives focuses on the scale of likely impacts on the historic environment e.g. 'the no. of monuments/archaeological sites/historic parks and gardens adversely affected by the development plan proposals.</p>	Accept that there is merit in including specific consideration of SAMs and historic parks and gardens in the assessment. Suggest that the correct place for this is as an amplification of Obj. 19 through the addition of indicators, inclusion of all relevant data in the baseline and specific reference within the assessment rationale.	Additional data added to baseline and indicators in Sustainability Appraisal Framework (SAF) under objective 19. Consistency with assessment rationale revised.
36	Cadw	<p>App. A baseline data</p> <p>Ensure data on historic assets is included. Cadw provides data to Council monthly.</p>	Accept.	Data added to baseline and subsequent amendments to SAF made.
124	The National Grid (via WYG)	National Grid does not wish to make any specific representation at this time, but would like to be included in all future consultation.	Noted.	NCC to retain National Grid on consultation list.
126	Gwent Wildlife Trust	<p>Request for inclusion of following within the PPP list:</p> <ul style="list-style-type: none"> • Agenda 21 • Convention in Biological Diversity • Statement of Principles of Forests • Declaration on Environment and Development • UN Framework Convention on Climate Change 	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	<p>PPPs reviewed and added to list.</p> <p>Additions to sustainability themes table made.</p>

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		<p>Recommend consideration of the following in the PPP review</p> <ul style="list-style-type: none"> • EU Directive on Environmental Impact Assessment • The Aarhus Convention and EU Directive on providing public participation in the drawing up of certain programmes relating to the environment • EU Rural Development Policy • European Common Agricultural Policy (reform 2003) • Renewable Energy Coalition • Intelligent Energy Europe – Community Supports Programme • Environmental Liability Directive (2004/35/CE) • European Employment Strategy • Farming for the Future (Defra) • Section 42 list of Habitats and Species of Principal Importance for the Conservation of Biological Diversity (Wales Biodiversity Partnership 2003) • River Usk Catchment Abstraction Management Strategy (CAMS) <p>Also recommend reference be made to PPPs that are currently in draft form</p>		
126	Gwent Wildlife Trust	<p>Request that the importance of Newport's ecological heritage is featured as a characteristic of the Borough.</p> <p>Request for additional tree and woodland data to support this and incorporation of indicators such as:</p> <ul style="list-style-type: none"> • area of ancient woodland and planted ancient woodland • number of tree preservation orders • length of hedgerows • % trees replaces • no. of SUDS schemes • habitat creation schemes 	<p>Accept that the ecological heritage should be referenced as characteristic.</p> <p>Suggestions for indicators welcomed – these need to be considered in relation to the potential for the LDP to exert a tangible influence.</p>	<p>Ecological heritage importance reflected in baseline and subsequently, the key issues table and SAF.</p> <p>Additional indicators added under objective 19 as well as objective 2.</p> <p>Assessment rationale revised to reflect modifications.</p>

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		<ul style="list-style-type: none"> use of native species within landscaping schemes no. of businesses achieving the Biodiversity Benchmark award 		
126	Gwent Wildlife Trust	<p>App. A2</p> <p>Request following addendums in table:</p> <ul style="list-style-type: none"> Newport Wetland is now a National Nature Reserve Gwent Wildlife Trust and WING manage the Solutia Reserve at Great Traston Meadows (which partly falls within the Nash and Goldcliff SSSI) of the sites listed, WIND now manages only the Allt yr Yn LNR and shares management of the Solutia Reserve Ringland Wood is now managed by a 'Friends of' community group. Caerleon Comprehensive Nature Reserve has always been managed by the school The other sites (Duffryn Pond, Oaklands, Lodge Wood) are not managed by WING. 	Suggestions for corrections are welcomed, however, the last three notes are unclear as the data is not referred to in the baseline.	Changes made to baseline, aside from last three.
126	Gwent Wildlife Trust	<p>Support for the acknowledgement of the value of sites that have not been assessed against SINC criteria.</p> <p>Welcome the acknowledgement of the important role a high quality environment has in supporting local tourism.</p> <p>Welcome the relation of issues to climate change.</p>	Support noted and welcome.	None required
126	Gwent Wildlife Trust	Request greater emphasis on the importance of mitigating and adapting to climate change.	Noted	Additions made to SAF across various objectives, to reflect mitigation of climate change effects. Objective 13 modified to include the need to adapt to climate change effects.

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126	Gwent Wildlife Trust	<p>Suggest that the text points to an incorrect assumption that important, declining and scarce species are only found in LBAP habitats. Suggests that while it may not be a priority to protect certain habitats, these species require protection (dormice and ranunculus moth referenced).</p> <p>Recommend that rare and protected species are treated as a separate issue within the text. Suggest that this could be reflected through greater emphasis on the protection and enhancement of biodiversity in all planning decisions. Suggest that recovery is also important and this should be recognised.</p>	Accept that the protection of biodiversity should be reflected in planning policy irrespective of ecological designation of a site/habitat. SR should incorporate reference to those matters that can be readily influenced by planning policy.	Key issues table modified and subsequent changes to SAF made.
126	Gwent Wildlife Trust	Request inclusion of ecological connectivity within the SA Framework as an objective – support the creation and improvement of ecological connectivity.	Accept that there is a need to incorporate ecological connectivity within the LDP.	Ecological connectivity added as an indicator under objective 2.
126	Gwent Wildlife Trust	Strong support expressed for SA Objectives and particularly the assessment rationale. Diffusion of climate change issue across many topics is considered to show recognition that responsibility for the global environment is not restricted to one particular sector and is supported.	Support noted and welcome.	None required.
126	Gwent Wildlife Trust	<p>Series of comments relating to suggested indicators:</p> <ol style="list-style-type: none"> Obj. 1 definition required for woodland management schemes Obj. 1 query ability to monitor uptake of guided walks Obj. 1 definition required for 'valued open space; and 'valued landscape' Obj. 1 recommend inclusion of an indicator for tree cover and protection (loss of trees covered by TPOs, % trees lost to development that are replaced) Obj 2 increasing population size of protected species should be defined as increase in range and/or increase in number of individuals Obj. 2 require definition for 'important wildlife habitat' – recommend this should be Section 42 habitat Obj. 2 recommend indicator relating to extent of invasive species (Jap. Knotweed or Himalayan balsam) 	<p>Suggestions for additional indicators are welcome. SR should incorporate reference to those matters that can be readily influenced by planning policy.</p> <p>6- the section 42 list refers to species rather than habitats.</p>	<ol style="list-style-type: none"> Definition provided in glossary. Indicator deleted Definitions provided in glossary. included in SAF included in SAF Definitions (including species and habitats) provided in glossary.

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		<p>8 Obj. 2 recommend indicator to reflect contribution of landscaping schemes to biodiversity e.g. % native species used in landscaping schemes</p> <p>9 Obj. 3 recommend caution in favouring brownfield sites for development and would like addition of qualifier such as 'subject to assessment against the sustainability objectives'</p> <p>10 Obj. 4 recommend modifying vegetation and planting schemes to promote the use of native species</p> <p>11 Obj. 5 suggest matching water quality indicators to the WFD classifications for ease of monitoring</p> <p>12 Obj. 5 suggest an additional indicator of 'native vegetation and planting schemes to provide carbon sink capacity and improve water quality locally'</p> <p>13 Obj. 10/12 recommend addition of 'number of businesses achieving the Green Dragon standard'</p> <p>14 Obj. 16 recommend a target of achieving the CCW accessible natural greenspace standard as well as the NPFA standard</p>		<p>7 included in SAF</p> <p>8 included in SAF</p> <p>9 included in SAF</p> <p>10 included in SAF</p> <p>11 included in SAF</p> <p>12 included in SAF (omitting reference to water quality)</p> <p>13 included in SAF</p> <p>14 included in SAF</p>
250	Persimmon Homes (via WYG)	<p>Recommend addition of the following to the PPP list:</p> <ul style="list-style-type: none"> • PPW, WAG March 2002 • MIPPS 01/2005 Planning for RE • MIPPS 02/2005 Planning for Retailing and Town Centres • MIPPS 01/2006 Housing • MIPPS 01/2008 Planning for Good Design • Local Development Plans Wales: Policy on Preparation of LDPs • The Six Acre Standard: minimum standards for outdoor playing space • LANDMAP • Joint Housing Availability Study for Newport • Housing Needs Study (if available) 	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and added to key sustainability themes table.

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250	Persimmon Homes (via WYG)	<p>Recommend reference to the following sources of data:</p> <ul style="list-style-type: none"> • LANDMAP aspect areas (visual and sensory; historic; cultural; habitat; geology) • Registered Common Land • open access land • SAMs • LBs • Registered Parks, Gardens and Landscapes • Designated Conservation Areas • Schools rolls (surplus capacity) • agricultural land classification 	Suggestions for additional sources of data welcome. The SR should include reference to those that can be influenced by LDP policy.	<p>Additional data added to baseline and subsequently, indicators added to SAF.</p> <p><i>LANDMAP data unavailable at the time of writing- website technical fault- to be sourced and included at stage B.</i></p>
250	Persimmon Homes (via WYG)	Sustainability Issues identified are supported.	Support noted and welcome.	No Change required.
250	Persimmon Homes (via WYG)	<p>Indicators – corrections suggested as follows:</p> <ul style="list-style-type: none"> • Obj. 9 the target for % development approved in flood risk areas contrary to TAN 15 should be nil • Obj. 19 should include reference to SAMs and LBs 	Suggestions for corrections are welcomed.	Corrections made.
250	Persimmon Homes (via WYG)	Identified discrepancies between 'potential indicators' and 'target' given for each SA objective and the 'rationale' given subsequently. In particular, the rationale raises issues that are additional to those in the potential indicators and targets – this should be consistent.	Accepted – there is a need to ensure that there is a logical progression through the SR and subsequent SAR.	Assessment rationale reviewed and revised to reflect the newly modified report and SAF.
357	Dwr Cymru Welsh Water	Sustainability Issues identified are supported.	Support noted and welcome.	No Change required.

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357	Dwr Cymru Welsh Water	Request reference made to the need to remove surface water associated with new development from the sewerage network to avoid unsustainable upgrade works.	SUDS are supported throughout the document, it is considered that suitable emphasis has been placed on this issue.	No further action required.
208	RSPB	Requests greater evidence of integration of the SR and the HRA.	The HRA is a separate process that is being prepared in tandem with the SA/SEA and the development of the LDP. The findings of the HRA to date are included in the baseline data and have been used to inform the development of the issues analysis and SA Framework and will continue to influence the process.	Review and provide cross-reference where data has been drawn from HRA as appropriate in the next stage of the SA/SEA. No further changes made to the Scoping Report.
208	RSPB	Highlight omission of an updated LBAP as a key weakness in enabling the process of establishing the baseline.	The Council is in the process of updating the LBAP. At such time as the revised LBAP is available, the quality of baseline information relating to the SA/SEA will be reviewed and amended if appropriate. The HRA is also being undertaken in consultation with relevant nature conservation bodies and latest information being incorporated as it becomes available to the team.	Ensure that LBAP progress is tracked and incorporate findings of revised LBAP at such time as it becomes available, which will be in subsequent stages of the SA/SEA.
208	RSPB	Pp45, 9, column 2 Strong opposition to inclusion of phrase 'there is a careful balance to be struck between safeguarding environmental quality and achieving requisite development' on the basis that the representor interprets this as counter to the aim of sustainable development to achieve a win win solution to meeting economic and social goals whilst at the same time protecting designated sites.	The comment has highlighted the potential for the phrase referring to balance to be misinterpreted – the intention was to highlight the need to achieve the win win situation to which the representor refers.	Phrasing within key issues table revised. No modification made with regards to the Gwent Levels.

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		<p>It is recommended that the SR should emphasise the need for the attainment of economic and social goals to safeguard against significant adverse impacts on designated sites in Newport.</p> <p>Request that the reference to balance should be deleted and a new section inserted that refers to integration in support of sustainable development, which should also set out s a key recommendation of the DSR that 'no development should take place on the Gwent Levels'.</p>	The assertion that no development should take place on the Gwent Levels requires careful consideration in light of the potential interpretation of 'development', some of which may be necessary for environmental protection reasons.	
208	RSPB	<p>pp46</p> <p>Highlight the DSR as being deficient on the basis that it does not set out the likely threats to designated sites from the LDP. Request an additional section setting out threats.</p>	It is considered that the inclusion of a new section on threats would be premature for inclusion in the SR. Threats will be accurately assessed at Stage B of the SA/SEA process and incorporated into the SAR.	No change required at this stage.
208	RSPB	<p>pp76 Assessment Rationale</p> <p>section on Obj. 2 considered deficient on basis that it fails to recommend that no allocations should be made on or in the vicinity of the Gwent Levels SSSI. Request that this section is deleted and redrafted to reflect the supreme importance of the Gwent Levels.</p>	<p>Not accepted. The objective is not exclusively related to the Gwent Levels SSSI and it is not considered appropriate for the objective to be narrowed in focus to exclude other important aspects of biodiversity within NCC.</p> <p>This level of specific detail is not required until the SA/SEA proceeds to assessment of specific LDP policies in Stage B and will be addressed as appropriate in the SAR.</p>	No change required at this stage.
208	RSPB	<p>pp56</p> <p>Representor objects to the following reference: 'the new M4 will have implications for the proportion of people travelling to work in Newport'. Representor highlights issues of longer commuting distances, displaced congestion and exacerbation of climate change. Also request that the reference</p>	Partially accepted – it would be premature to make an assessment of the implications of the M4 prior to Stage B assessment – this will be considered in the SAR.	Reference to M4 removed at this stage.

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		is made to 'proposed M4' as opposed to new as the proposal has no status to date.	Correction to reference to M4 as a proposed scheme is accepted.	
208	RSPB	<p>PPP</p> <p>Request division of national into UK and Wales.</p> <p>Suggest addition of the following to PPP list:</p> <ul style="list-style-type: none"> Wales Biodiversity Framework One Wales: Connecting the Nation: The Wales Transport Strategy delete TAN 5 1996; insert TAN5 Consultation version 2006 Road Traffic Reduction Act Reference to the Environment Strategy should include the Action Plans Learning to Live Differently: The National Assembly for Wales Sustainable Development Strategy WDA: Wales Biodiversity Audit WSP SE Wales area framework WAP SE Wales A Networked Environmental Region 	<p>There is not considered to be any merit in dividing the PPP list into UK and Wales as both are applicable at the same scale in the Welsh context.</p> <p>Suggestions for additional PPPs welcomed. Until such time as TAN 5 is replaced, it is inappropriate to delete the currently adopted document; however, the addition of the consultation version is accepted.</p> <p>Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.</p>	<p>PPPs reviewed and added to key sustainability themes table.</p> <p><i>Last three unable to source at time of writing.</i></p>
208	RSPB	<p>Additional data sources suggested as follows:</p> <ul style="list-style-type: none"> CCW has mapped UKBAP Priority Habitats in Newport RSPB Key Areas for Priority Birds 2007 covers Newport 	<p>Suggestions for additional sources of data welcome. The SR should include reference to those that can be influenced by LDP policy.</p> <p>UKBAP mapping and Priority Birds is considered more appropriate for the AA- the results of which will be integrated into the SA- contact: Sarah Revill.</p>	No further action.
208	RSPB	<p>Sustainability Key Issues are not supported on the following basis:</p> <ul style="list-style-type: none"> section on biodiversity (pp45) considered deficient as does not set out the 	The nature of the comments suggests that the purpose of the	Key issues table and indicators modified.

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		<p>issues associated with designated sites – suggest that this is damage from all development types and that the implications should state that no development that would have a significant adverse impact on statutorily designated sites will be permitted.</p> <ul style="list-style-type: none"> column 2 of biodiversity (pp45) should remove reference to balance query reference to ‘requisite’ development and the attendant implication that there will need to be a fixed areas of development for all development types, on the basis that this does not reflect the non-land means of promoting economic development (i.e. through addressing skills and education agendas and making more resourceful use of existing built development). Request that this paragraph is deleted and replaced with ‘the LDP should allocate land carefully in order to avoid having significant adverse impacts on any statutorily designates sites’. 	<p>SA/SEA and the LDP are confused at times. Certain of the comments raise valid points that merit consideration and possible amendment; however, others are more appropriately reflected in policy phrasing within the LDP as opposed to objectives in the SA/SEA and in certain cases, relate to matters that cannot readily be addressed through land use planning.</p> <p>It should also be noted that the magnitude of potential impacts of LDP policies will not be assessed until Stage B, which is reported in the SAR (not the SR) and the SA/SEA is concerned with predicting the potential impacts of policies against the SA Framework, <i>not</i> the determination of consequences of development control decisions.</p>	
208	RSPB	Request that section on non-designated habitats be amended to include reference to all forms of development.	This is not accepted – some forms of development will be necessary. Consideration may be given to providing greater clarification of what types of development are considered to pose the greatest threats.	Phrasing modified.
208	RSPB	Insert separate ‘issues’ section on species of acknowledged conservation concern.	The HRA process is being completed in tandem with the SA/SEA and addresses these issues in greater detail. There may be merit in providing additional detail outlining	Biodiversity ‘issues’ section amended.

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			the general issues associated with species protection.	
208	RSPB	Series of specific proposed amendments set out in the full representor response (see Note 1)	<p>Accept points, 7, 8, 9, 14, 22.</p> <p>Point 3: Habitats Directive already included</p> <p>21 is noted; however it is important that the SR is easily understood and cross-referring to specialist documents (e.g. Sec. 42) as opposed to listing relevant information is not necessarily considered appropriate.</p> <p>17- Favourable condition indicators covered under separate objective.</p> <p>19 and 21- the combination of all the SA objectives will ensure that all policies are appraisal under all objectives. Therefore it is unnecessary to include environmental concerns within the economic objective.</p> <p>Review validity of points 5, 6, 10, 11, 12, 13, 15, 16, 19, 20, 23.</p> <p>Reject points 1, 2, 4, 17, 18 on the basis that they are inappropriate or unnecessary within the SR.</p>	<p>Changes made with regards to points: 7,8,9,14,22, 5 (although specified dph not used), 6, 10, 11, 13, 16, 23</p> <p>Points rejected: 1,2,3,17,18, 12, 15 (30-50 dph used), 19 & 20 (other objectives capture this)</p> <p>No further action with regards to points: 3, 21, 17, 19, 21</p>
209	Mr R Kelly	<p>Asserts that development, to be sustainable, requires a cluster of development around the main UDP land-use at Corus</p> <p>Representor suggests that the M4 toll road and car proposed interchange south west of Corus should be considered.</p>	It is considered that these comments are more appropriately directed to the LDP team as the SA/SEA assesses the policies.	No further action made.

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		To encourage the UDP proposals at Corus further development particularly for family houses should take place south. This will ensure a sustainable linkage		
1335	Mr R Lewis	Supports sustainability issues and indicates that additional objectives should be provided, but sets out no further detail.	Noted.	No change required.
1456	The Theatres Trust	Supports sustainability issues, particularly that leisure offer should be sustained and improved and would welcome specific guidance on protecting and encouraging arts and cultural provision.	The SR is not set up to provide specific guidance of the sort referenced; however, such issues can be reflected in the indicators.	Added to SAF under objective 20.
1576	CCW	Stress that all comments are made in the light of commendation on the overall quality, clarity and content of the document and should be considered to reflect areas for improvement or refinement.	Support noted and welcomed.	No action required.
1576	CCW	Highlight the requirement to ensure that the SEA elements are clear throughout the report, particularly the consideration of cumulative, synergistic and indirect effects. Concern is also raised that the SR does not reference the consideration of alternatives as required by Article 5 of the SEA Directive.	The SA/SEA methodology proposed has been refined through several years of practical application and is considered to satisfy the SEA Directive. The SAR includes the consideration of alternatives in the appraisal of options (stage B2) and cumulative, synergistic, indirect effects (as part of B3/4) and will clearly indicate the significant environmental effects – this is the next stage of the assessment.	No change required at this stage.
1576	CCW	Request that the outputs of the community strategy are incorporated into the SA/SEA Scoping.	Accepted. The community strategy has been reviewed as part of the baseline work (Stage A), is included in the PPPs and key points have influenced the identification of key issues.	No further action taken.

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1576	CCW	<p>The following suggestions were made for corrections:</p> <p>1.1 – insert ‘candidate’ re: Severn Estuary SAC</p> <p>1.6 – reference potential effects to Ramsar and European Sites outwith the plan area (e.g. water abstraction implications for River Wye SAC)</p> <p>Recommend inclusion of clarification that as part of any Appropriate Assessment NCC will have regard to the manner in which the plan would be carried out, and to any conditions or restrictions which could avoid adverse impacts on the European Site(s)(Regulation 48(6) of the Conservation (Natural Habitats &c) Regulations 1994)</p>	Accepted.	Amend to reflect comments.
1576	CCW	Recommendations for the inclusion of a considerable no. of additional PPPs (see Note 2)	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and added to key sustainability themes table.
1576	CCW	<p>Recommends that the SA/SEA should include the aim to protect, maintain and enhance not only ‘areas of biodiversity importance’ but also aim to positively contribute to wider biodiversity and connectivity between sites of biodiversity importance and significance.</p> <p>Suggest ref. to HRA is not required as it is a legal prerequisite, but highlights those additional SEA topics to which this relates are human health, soil, water and air.</p>	Accept. The objective seeks to ‘To protect, manage and enhance biodiversity’ which includes areas of importance as well as the wider perspective. The cumulative effect of the indicators will enable this.	No further action taken.
1576	CCW	Request to clarify when there is a difference between a legislative duty to protect habitats and species and under which circumstances this is a discretionary action. Recommends that LDP should aim to protect the effective viability of protected sites and species through reference to their functional size and ecological connectivity and reference the duty on the LPA under Section 40(1) of the Natural Environment and Rural Communities Act 2006.	Accepted in concept and it is agreed that the reference to ecological connectivity could be incorporated into the SA Framework through identification in issues, reflection in indicators and reference in the	Ecological connectivity added to SAF as an indicator under objective 2.

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			assessment rationale.	
1576	CCW	<p>Noise Pollution</p> <p>Request reference to any tranquillity mapping available for NCC and both the positive benefits of natural green space in reducing noise pollution and those areas where noise pollution may have significant detrimental impacts to protected species and habitats.</p>	<p>Accepted – there is a need to source tranquillity mapping. This should be incorporated into the baseline analysis as and when it becomes available. The need to emphasise the value of greenspace is noted.</p> <p>Note: Data not available until 2010.</p>	No further action until data becomes available.
1576	CCW	<p>Air Pollution</p> <p>Highlights requirement for policies to seek to promote pollution reducing activities such as sustainable transport and the value of the natural environment.</p>	Agreed. The SA Framework already incorporates objectives linked to all of the issues highlighted.	No change required.
1576	CCW	<p>Energy Efficiency of housing stock</p> <p>Request reference to improving the energy efficiency of existing housing stock.</p>	Agreed. The SA Framework already incorporates indicators linked to the issue highlighted. It should be noted that it is difficult for land use planning to be pro-active on this issue.	No change required.
1576	CCW	<p>Reduce the risk of flooding</p> <p>Recommend inclusion of policies that explore alternative uses for flood risk areas in terms of biodiversity, flood storage/alleviation, managing coastal squeeze etc.</p>	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale.	Added as an indicator under objective 9.
1576	CCW	<p>Encourage sustainable use of the countryside</p> <p>Recommend inclusion of policies that recognise the value of this asset and seek to enhance through appropriate investment where possible and appropriate to ensure sustainability in the longer term.</p>	<p>It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies.</p> <p>The indicator measuring countryside management schemes addresses</p>	No further action taken.

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			this comment.	
1576	CCW	Promote protection and enhancement of valued landscape character AND protect and enhance the valued historic environment and its setting Recommend that the historic landscape be referenced (Gwent Levels Historic Landscape of Outstanding Historic Interest) including the ASIDOHL methodology and LANDMAP.	Noted. Baseline data requires reference to historic data, some of which was not available at the time of writing. ASIDOHL is a specific assessment process that is generally triggered at such time as developers seek planning permission – as such it is not considered appropriate to reference in the SR – this comment is more appropriate for the LDP team.	At such time as requisite data is available, incorporate into the SAR as appropriate.
1576	CCW	Reduce pollution of watercourses, groundwater and improve water quality Recommend a more proactive approach within the policy framework than ensuring adequate drainage. Seeking to see SUDS as a matter of course and specific policies to tackle issues such as contaminated land.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale. The SR already includes reference to SUDS as an appropriate measure of controlling water quality and addressing drainage and cross-reference is made in details linked to air quality and pollutant release.	No further action taken.
1576	CCW	Ensure prudent use of land and other resources This section should also reference SEA topics Climatic Factors and Cultural Heritage	Accepted	Amendment made in accordance with comment.
1576	CCW	Encourage the use of more sustainable modes of transport	Accepted	Amendment made in

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		This section should also reference SEA topics climatic factors and air		accordance with comment.
1576	CCW	Address the causes of climate change etc. SA/SEA should also contain policies which address the impacts of climate change through 'future proofing' development policies and proposals.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale. Measures to adapt to the future impacts of climate changes such as flood risk, energy efficiency, sustainable design and linked habitats are already encompassed within other objectives.	No further action taken.
1576	CCW	Increase energy efficiency and promote renewable energy production and use Expect to see policies that promote new energy generation, to include full evaluation of potential impacts on the natural environment, particularly landscape and protected sites and species.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale.	No further action taken.
1576	CCW	Safeguard non-renewable resources Recommend that all such policies include full consideration of potential impacts on the natural environment particularly landscape and protected sites and species.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale.	No further action taken.
1576	CCW	Improve accessibility	Accepted	Amendment made in accordance with

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		This section should also reference the SEA topic Air		comment.
1576	CCW	<p>Improve health and well being</p> <p>Recommend reference to the therapeutic use of the environment, particularly accessible natural green space, as a key element of the SA/SEA process.</p>	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale.	Accessible natural greenspace added as an indicator in the SAF.
1576	CCW	<p>Reduce poverty and social exclusion etc.</p> <p>CCW promotes access to a quality environment for all and recommends the inclusion of quality environmental facilities, recreational space and biodiversity as an integral part of any general social improvement policies.</p>	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale. The cumulative effect of the SA Objectives will help to achieve this aim.	No further action taken.
1576	CCW	All economic themes should also reference the potential implications of various options on the transport infrastructure, water resources and biodiversity and incorporate, where possible, PPPs that promote and enhance them.	<p>It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale.</p> <p>Stage B of the assessment will consider the cumulative, synergistic and indirect effects of policies against the SA Framework, which should assist in capturing some of these issues.</p>	No further action taken.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
1576	CCW	Establish a strong tourism economy etc. This section should also reference 'biodiversity' as many of the tourism opportunities in Newport relate to the natural environment	Accepted.	Amendment made in accordance with comment.
1576	CCW	Suggest further consideration of the following datasets: <ul style="list-style-type: none"> Further detail on the 'important species' referenced in the framework analysis for key habitat types with reference to Phase I and any monitoring data available from CCW and/or SEWBRec Historic Landscape Characterisation RoWIPs Accessible Natural Greenspace provision LANDMAP data TAN 8 and supporting information re: locations for development of sustainable energy resources 	<p>Agree that there could be benefit in clarifying the 'important species' to be protected. Representations have referenced Sec 42, which may be appropriate to include in the appendix and cross-reference. Similarly, key habitat types are listed in the appendices and could benefit from cross-referencing.</p> <p>Phase 1 and data from SEWBRec and CCW will be included within the AA, the results of which will be integrated into the SA.</p> <p>Accessible Natural Greenspace The toolkit has not been undertaken and is due to start in the next few months.</p> <p>Suggestions for additional sources of data welcome. The SR should include reference to those that can be influenced by LDP policy.</p>	<p>Rights of Way data already included within baseline.</p> <p>Further detail on important species added throughout the report, especially key issues table.</p> <p><i>Historic Landscape Characterisation and Accessible Natural Greenspace Provision data unavailable at time of writing.</i></p> <p><i>LANDMAP data unavailable at the time of writing- website technical fault- to be sourced and included at stage B.</i></p> <p>Note: Newport is not within any of the TAN8 strategic locations.</p>
1576	CCW	Table 5.1 1. refer to APIS air quality data for critical loads and limits for specific habitat	Suggestions are welcome. Care should be taken to ensure that the level of detail is correct for SEA and	1. no further action 2. changes made to

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		<p>types. Include reference to potential for creating carbon sinks</p> <ol style="list-style-type: none"> query appropriateness of local food production and highlights need to reference in indicators (e.g. no. and active take up of allotment areas; supporting local food suppliers for council services; support for farmer markets. insert WAG targets in respect of CO2 emissions insert indicators specifically linked to BREEAM and additional measures in the WHQS use LANDMAP as a key indicator and ensure that landscape indicators do not relate to biodiversity designations use RHS to identify targets in respect of water quality ensure flood risk includes measures to 'future proof' development and include opportunity for creating/managing habitats for flood alleviation and creating sustainable drainage schemes seek inclusion of reference to the specific provisions now in legislation for setting up Commons Associations in reference to targets and performance indicators correct reference to River Usk and Severn Estuary and complete the reference to the full range of DAC features within the baseline (i.e. habitats as well as species) incorporate BAP targets for specific habitats and species and developing eco-connectivity work for further improving and enhancing the network a robust assessment of the implications of development on contaminated land will need to be included in the HRA include access indicators for non-road modes (e.g. RoWIP targets) cultural heritage should consider natural and built environment reference should be made to specific targets for health and physical activity that are set out in the access to natural greenspace toolkit Economic elements should be cross-referenced to the environmental 	<p>not overly detailed as the latter is addressed through project-level EIA. There is also a need to ensure that the SA/SEA framework remains focused on matters that can reasonably be influenced by land use planning through the policies and proposals of the plan.</p> <p>HRA points noted and will need to be actioned by the ecology team undertaking the work in tandem with the SA/SEA.</p> <p>Access to natural greenspace: The toolkit has not been undertaken and is due to start in the next few months.</p>	<p>SAF</p> <ol style="list-style-type: none"> SAF amended no further action taken <i>LANDMAP data unavailable at the time of writing- website technical fault- to be sourced and included at stage B.</i> WFD indicators used SAF amended. no further action changes made to key issues table <i>BAP targets to be included when available.</i> no further action for SA Already included- no further action SAF modified <i>Toolkit to be included when available.</i> <i>This is a</i>

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		indicators, especially climatic factors.		<i>fundamental element of the SA process and will be evident at stage B.</i>
1576	CCW	Recommendations for Table 6.1 SAF: Series of specific proposed amendments (see Note 3)	Accept points 1, 2, 3, 11, 15, 19, 25, 26 Review validity of points 4, 5, 7, 10, 16, 23 Reject point 9 on the basis that they are inappropriate or unnecessary within the SR.	Changes made in accordance with points: 1,2,3,11,15,19,25,26, 5 (reviewed), 7, 23 No further action with regards to points: 9,4,10
1576	CCW	Strong support for the Assessment Rationale	Support noted and welcome.	No change required.
1631	Accent Newport Trust	Provision of detailed explanation and description of perceived benefits of Chartist led development (Stow Hill Area Chartist Project)	The SA/SEA is required to focus on issues of strategic importance and provide a framework for assessing the performance of LDP policy formulation in relation to the Sustainability Appraisal Framework. Much of the material submitted by the representor is considered of value in respect of providing a basis for support in LDP policy formulation and would more appropriately be directed to the LDP team. The detail of the project would not be subject to assessment through the formal SA/SEA process unless it were to be included as a specific policy within	Chartist data added to baseline, key issues table and as an indicator under objective 20.

Rep. No.	Name and Organisation/ Department	Summary of Comment <i>(refer to NCC consultation database for full text)</i>	Response	Action
			<p>the LDP and is therefore not considered to be directly relevant to the finalisation of the SR.</p> <p>Notwithstanding the above, the list of potential benefits can be cross-referenced against the proposed SA Framework to ensure representation; and there is considered merit in referencing the Chartist movement within the baseline description.</p>	
1631	Accent Newport Trust	Support for the Sustainability Issues identified	Support noted and welcome.	No change required.
1631	Accent Newport Trust	Suggest that the concept of 'citizenship' be included as a separate category	This was discussed at length through consultation workshops and no satisfactory conclusion was reached with regard to a definition of citizenship that linked directly to the potential for change to be delivered via the planning system. As such, it is not considered appropriate to separate the concept out into a standalone objective.	No change required.
1671	Newport City Council	<p>Suggest that addition of the following PPPs</p> <ul style="list-style-type: none"> • Climbing Higher • Sports Development Strategy • Play Policy • Going for Gold • Five for Life • GP Exercise Referral 	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and information integrated into report, especially through the key sustainability themes table.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
1671	Newport City Council	Suggest consideration of the following sources of data <ul style="list-style-type: none"> Sports Council for Wales Biannual Study – adults and children Welsh Health Study 	Suggestions for additional sources of data welcome, although data from the Sports Council for Wales are already included in the appendices. The SR should include reference to those that can be influenced by LDP policy- the SR already includes the data on health that can be influenced by land use policy.	Data sources reviewed and data deemed unnecessary for inclusion based on the data already contained within the baseline.
1671	Newport City Council	Agreement expressed in respect of the sustainability issues identified.	Support noted and welcome.	No change required.
1671	Newport City Council	Suggest inclusion of the following as additional sustainability issues: <ul style="list-style-type: none"> walking from doorstep to school, work, shops etc.; cycle routes from doorstep to school, work, shops etc. access local community facilities multi-use games areas and informal play spaces meeting spaces 	Accessibility Standards are already included within Appendix A and lead to the accessibility objective in the SA Framework.	No further action taken following review of comments and report.
	Overview and Scrutiny Forum	Endorsement of the sustainability objectives set out in the report.	Support noted and welcome.	No change required.
1.1	Internal Comments	Suggest that the SA/SEA refer to the following: <ul style="list-style-type: none"> new Draft Economic Development Strategy 2008-2011, due to go to Cabinet in November for approval for consultation emerging Tourism Strategy going for review to Scrutiny in October Noted that the sections on skills and the local economy make no reference to	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability	PPPs reviewed and information integrated into report, especially through the key sustainability themes table.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		the EDS and suggest that this should be rectified.	themes that can be influenced by planning policy.	<i>Tourism Strategy not available at time of writing.</i>
1.2	Internal Comments	Seek correction of reference to the County Borough – suggest it should be City.	Newport remains a County Borough for the purposes of describing the type of administrative area. It is recognised that the Council name is Newport City Council.	Accuracy of referencing checked throughout document.
2.1	Internal Comments	Air Quality Suggested revisions to the potential indicators to ensure that they reflect matters already measured or recorded by the council and are measurable and achievable. Also designed to link to the UK Air Quality Criteria objectives.	It is recognised that indicators and targets should ideally reflect those already collected by the Council or other bodies; however, the SA/SEA may also require additional or new datasets to be developed to enable accurate recording of progress against the objective.	No further action taken at this stage.
2.2	Internal Comments	Climate Change and Energy Efficiency Highlights importance of considering air quality and climate change as separate issues, primarily on the basis of scale.	The comment is accepted. The SA/SEA does make a distinction between air quality and climate change by providing separate objectives; however, it is considered appropriate to maintain some cross-over in the indicators as the two issues share common links.	Text reviewed to ensure distinction is clear.
2.3	Internal Comments	Objs. 5, 10 and 11 Representor states that Objective 5 is vague and suggests that it should be incorporated into Objs. 10 (energy efficiency); 11 (promoting renewables); and 13 (promoting sustainable high quality building design). It is suggested that on their own it is unclear what environmental benefit they provide and incorporation of energy efficiency would rectify this. Strengthen indicators for Obj. 10 – remove NOx emissions rate for boilers;	It is considered that the assessment rationale reflects the difference between the different objectives and supports the retention of Obj. 5 in addition to the others. There may be merit in reviewing the indicators to ensure they align with	Objective 5 retained Assessment rationale modified for objective 5 to better reflect the indicators. No her changes made to

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		replace with an indicator relating to the number of upgrades. Draw on Energy Saving Trust/Energy Efficiency Advice Centre to identify targets for Obj. 10 and calculate carbon savings.	the rationale. Accept that SAP rating indicator is incorrectly placed and should be moved from Obj. 11 to Obj. 10. It is considered that the calculation of carbon savings is too specific for this level of assessment and is a matter that would be considered through other processes (e.g. project level EIA and/or BREEAM assessment).	avoid unnecessary repetition in the SAF-policies are assessed against all objectives simultaneously and the SA/SEA process requires consideration of cumulative, synergistic and indirect effects. Indicator for objective 10 retained. SAP indicator moved.
2.4	Internal Comments	Additional sources of data for climate change, energy efficiency etc. targets and indicators suggested: <input type="checkbox"/> consultation with local authority HECA officer (Paul Thomas) <input type="checkbox"/> consultation with Energy Manager (Jonathan Morgan) <input type="checkbox"/> consultation with sustainability officer (Carl Touig) <input type="checkbox"/> consultation on energy efficiency, renewable and climate change objectives and targets with the Welsh Local Government Association Energy Efficiency/Renewables officer Jim Prosser; The Energy Saving Trust Office; and Carbon Trust.	The suggestions are welcome. For the purposes of the SR, consultation has been undertaken with key stakeholders, within which the council officers have been provided with the opportunity to comment, both through workshops and in a formal written response. There will be further opportunity for comment at the next stage of the assessment, with the publication of the SAR.	No further targeted consultation considered necessary at this stage.
2.5	Internal Comments	Suggestion to reference the following: <input type="checkbox"/> DTI White Paper <input type="checkbox"/> Towards a low carbon future <input type="checkbox"/> WAG A Fuel Poverty Commitment for Wales <input type="checkbox"/> Review of Energy Policy in Wales <input type="checkbox"/> Starting to Live Differently <input type="checkbox"/> Energy Saving Wales	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and information integrated into report, especially through the key sustainability themes table. <i>Energy Strategy unavailable at time of</i>

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		<ul style="list-style-type: none"> An Energy Strategy for Welsh for LAs 		<i>writing.</i>
2.6	Internal Comments	<p>Obj. 3</p> <p>Amend indicator to read 'area of <i>potentially</i> contaminated land remediated and brought back into use' to correct the legislative definition and meaning.</p> <p>Add indicator 'the no. of sites investigated or remediated on behalf of the local authority.'</p>	Accepted.	Amendment made in accordance with comment.
3.1	Internal Comments	<p>Replace the Wales Transport Framework 2001 with the Wales Transport Strategy – One Wales: Connecting the Nation April 2008 in the PPP list.</p> <p>SEWTA Regional Transport Plan Consultative Draft July 2008 should be added (currently out for consultation) – add to PPPs.</p>	Accepted. There will also be a need to review the document and include relevant points in the sustainability themes etc.	PPPs reviewed and information integrated into report, especially through the key sustainability themes table.

Note 1: RSPB Specific Proposed Amendments

- Section 1.1, Para 6, line 6 (p7): Delete "options". Insert "solutions". Reasons: conformity with the Habitats Regulations.
- Figure 2.1 (p14): Delete contents of Box A4 "Developing the SA Framework". Insert "Developing SEA Objectives" Reason: Conformity with the ODPM Guide quoted in the DSR.
- Table 3.2: Column 9, p21): Insert reference to the HRA into Row 2 of the "Environment" theme. Reason: Completeness.
- Table 3.2: Reference to the need for "policies" to "promote" or "provide" should be complemented by an equivalent reference to "allocations". Reason: It is important that the potential adverse impacts arising from allocations is reflected here.
- Table 3.2: Insert "development of a sustainable landuse pattern" and "the establishment of the requirement for a minimum housing density of 40 DPH" in column 5 of the "to ensure prudent use of land resources" row. Reason: A sequential approach is only one element of the prudent use of land.
- Table 3.2: As above, in respect of the row entitled "encourage the use of more sustainable forms of transport", and the "reduce traffic congestion" row.

7. Table 3.2: "Address the Causes of Climate Change and Promote the Reception in Greenhouse Gas Emission" (P26): Insert reference to the One Wales Transport Strategy and the Wales Spatial Plan SE Wales Area Statement.
8. Table 3.2: Column 5: Insert reference to climate change adaptation, not merely mitigation.
9. Section 4.4: Environmental Data (p37) Bullet Point 2: Insert "UKBAP and LBAP" before "Habitat Types". Reason : In order to add clarity to this section. Delete "Designated Sites of Important for Nature Conservation". Insert :-Sites of Special Scientific Interest (SSSIs) -Sites of Importance for Nature Conservation (SINCs) Reason: Clarity.
10. Table 5.1; Row "Biodiversity". Column 2 (p45): Delete sentence stating "...there is a careful ..etc". Insert a section on the need to pursue an integrated approach to sustainable development, which safeguards all nationally important nature conservation resources whilst promoting economic development and social goals. Reason: See covering letter.
11. Threats to Habitats2 (p46): Delete "Industrial development such as ...etc". Insert "All built development". Reason: Damaging development is not restricted to industrial development.
12. Row "Economic" p54 Column 2: Insert "provided that it does not have significant adverse impacts on biodiversity resources of acknowledged nature conservation concern" after "sites for employment" (line 5). Reason: In order that the LDP process pursues SD goals.
13. Row "Climate Change" p56 Column 2: Insert a section on how the LDP should both mitigate for and adapt to climate change.
14. Table 6.1 Objective 2 ("To protect, manage and enhance biodiversity"): Delete "LBAP targets to be added when they're completed" throughout. Insert:-WAG targets on the percentage of SSSI's in Favourable Condition and Natura 2000 sites in Favourable Conservation Status, for designated sites. -Insert "Halt losses" in the target column for species. Delete "Protected Species", in "Potential Indicators" column. Insert "Species of acknowledged conservation concern". Reason: Not all species of acknowledged conservation concern have the benefit of specific legal protection, over and above the protection of wild species in general. -The target for the amount of important wildlife habitat lost to other uses" should be zero. - The target for the "area of land affected by planning applications that lead to loss of species and habitats of important biodiversity value" should be zero.
15. Table 6.1 Objective 3 (p 64): The density standards set here are too low. The minimum standard should be at least 40 DPH. There should also be an equivalent job density target, expressed as jobs per hectare, as a means of expressing the efficient use of land for employment uses.
16. Table 6.1 Objective 5 (p 65): The target for greenhouse gas emissions should be set at 3% per annum. Reason: This is in conformity with the WLGA Declaration on Climate Change, of which Newport is a signatory. In addition, this objective should be expressed sectorally, with ambitious targets for annual greenhouse gas emissions reduction for housing, employment and transport.
17. Table 6.1 Objective 7: Potential indicators for water quality should include ree quality for the Gwent Levels. These data are available from CCW as part of its monitoring of Favourable Condition.

18. Table 6.1 Objective 7, Column 2 ("Rationale"): This column should state that LDP policy should state that development proposals which have a significant adverse impact on water quality (especially ree quality) will be refused.
19. Table 6.1 Objective 21 ("To enable High and Stable Levels of Local Employment in Newport"): Insert "...where this does not have significant adverse impacts on the environment" after "...suitable modes" (line 3) Reason: To comply with sustainable development.
20. Table 6.1 Objective 22: ("To support diverse and viable business growth") Insert "..sustainable" after "enhanced" (line 2) Reason: To comply with sustainable development.
21. Table A.1. "Indicator Important Species": The list of bird species set out here should be deleted throughout, and replaced with "species of acknowledged conservation concern, drawn from s42 of the NERC Act and Annex 1 of the European Union Habitats Directive. Reference should also be made here to the RSPB Key Areas in Newport, which focus conservation action in areas of national importance for the bird species concerned. Species Action Plans (SAPs) from the reviewed LBAP should also be included.
22. Table A1 ("Broad Habitat Types which occur in Newport") p6: Coastal and Floodplain Grazing Marsh, a UKBAP Priority habitat type should be added to this list.
23. Table A1 ("Threats to Coastal and Floodplain Grazing Marsh") p41: Bullet Point 12 should be deleted and replaced with :- "Development for all development types" Reason: Damaging development is not restricted to roads, landfill and leisure.

Note 2: CCW recommended additional PPPs

International and European Level

- Renewed EU Sustainable Development Strategy 2006
- Bonn Convention on the Conservation of Migratory Species of Wild Animals 1979
- Bern Convention on the Conservation of European Wildlife and Natural Habitats 1979
- Ramsar Convention on Wetlands of International Importance 1971
- EU Biodiversity Strategy
- Directive on the Assessment and Management of Flood Risks 2007/60/EC
- EU Bathing Water Directive 76/160/EEC
- EU Freshwater Directive 78/659/EEC
- Environmental Liability Directive 2004/35/EC

- EU Shellfish Water Directive 79/932/EEC
- UK Level
- Climate Change- the UK Programme 2006
- Air Quality Strategy for the UK 2007
- NERC Act 2006
- UK Marine Bill Consultation 2006
- UK Climate Impacts Programme 2002
- Sustainable and Secure Buildings Act 2004
- Our Energy Future- UK White Paper on Energy 2003
- Water Resources for the Future (Environment Agency)
- Stern Review on the Economics of Climate Change 2006
- Conservation (Natural Habitats & c) Regulations as amended
- Air Quality and Climate Change- a UK perspective 2007
- Consultation on Planning Policy Statement- Planning and Climate Change 2006
- Earth Science Conservation in Great Britain 1990
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Protection of Badgers Act 1990
- Hedgerow Regulations 1997
- Wildlife and Countryside Act 1981 (as amended)
- Countryside and Rights of Way Act 2000
- Protection of Badgers Act 1992
- Hedgerow Regulations 1997

National (Wales) Level

- Relevant Water Resource Management Plans (Dwr Cymru/Welsh Water)
- Relevant Catchment Abstraction Management Plans and Drought Management Plans
- Relevant Catchment Flood Management Plans (EA)
- Welsh Assembly Government Integration Tool 2002
- Wales Spatial Plan Update 2008-10-15
- Wales Transport Strategy 2007
- Priority Habitats in Wales (CCW) 2003
- Draft Wales Soils Action Plan 2007
- Cultural Strategy for Wales 2002
- Rural Development Plan for Wales 2007-2013
- Walking and Cycling Strategy for Wales
- Ministerial Interim Planning Policy Statements 01/2008 Planning for Good Design
- Ministerial Interim Planning Policy Statement 01/2005 Planning for Renewable Energy
- Ministerial Interim Planning Policy 02/2005 Planning for Retailing and Town Centres
- Planning for Climate Change- consultation document Dec 2006.
- Wales Waste Strategy
- Wales Coastal Tourism Strategy
- Register of special and outstanding historic landscapes
- Welsh Assembly Government Policy Integration Tool 2002
- CCW Priority Habitats in Wales 2003
- Better Woodlands for Wales 2005
- Consultation Planning Policy Statement: Planning and Climate Change 2006

- Welsh Office Circular 60/96: Planning and the Historic Environment. Archaeology/Historic Buildings
- Draft Strategy for Wales on Integrated Coastal Zone Management 2006

Regional Level

- Relevant Regional Spatial Strategies in England
- Available SEA consultation documents for the neighbouring authorities Local Development Plans and other relevant regional plans such as the regional transport plan)
- Consultation draft River Basin Management plans
- Draft Catchment Flood Risk Management Plans
- Historic landscape management plans (if available)
- Valleys Regional Park Action Plan
- Documents already produced to aid the production of Severn Estuary Shore Line Management Plan 2 e.g. the Gwent Levels Foreshore Management Plan and the Severn Estuary Coastal Habitat Management
- Plan (both Environment Agency Documents)
- WAG Severn Estuary Marine Aggregate Dredging Policy

Local Level

- Supplementary Planning Guidance - Crindau Development Brief and associated HRA
- Draft River Usk Flood Strategy
- Gwent Levels Water Level Management Plan (Caldicot and Wentlooge Levels Drainage Board/Environment Agency)

Note 3: CCW recommendations for table 6.1

1. While many of these are reasonable indicators of sustainability it is unclear how relevant they are to the LDP process; for example, how will the LDP be able to influence the uptake of guided walks or the use of the PRoW network? An alternative approach would be to adopt any targets and indicators contained in documents such as the RoWIP. Similarly, specific targets for areas of open space should reference documents such as the accessible natural green space toolkit and any losses should be tied to clear mitigation measures.

2. CCW welcomes the close linking of the Newport LBAP to the achievement of objective However, some of these indicators may have specific targets outside the LBAP process which can be influenced directly by LDP policies, such as the area of land subject to section 106 agreements and the amount of green space identified and safeguarded. These should be identified under their specific sections. In addition, some of the indicators, as suggested, are only of limited value given the context of this SEA relating to an LDP. Indicators should be relevant to the plan under scrutiny, capable of reacting in response to the plan under scrutiny and also capable of measurement. For example, indicators such as the population size of protected species may be difficult to influence through the LDP process and not be a particularly meaningful indicator. Finally, the area, numbers and condition of protected sites may be beyond the direct scope of the LDP process and CCW would wish to see these reconsidered, ideally after further discussion with ourselves before targets and indicators are chosen.
3. Indicators relating to consumption of locally produced food will be difficult to meaningfully relate to LDP policies. More meaningful indicators would relate to number and take-up of allotments, number and distribution/frequency of farmers markets, number of organics farming initiatives supported etc. Similarly, a direct link between grade of agricultural land and food production may not be relevant and would include important biodiversity markers.
4. Reference should be made to specific (critical?) locations or sensitive areas for monitoring and targeting actions. Specific carbon-sink schemes should be considered as distinct policies if to prove meaningful (see comments above) in respect to climate change. In addition to NOx values, ground level ozone may require a specific reference due to its potential impacts on health and biodiversity.
5. While, in principle, all of these are positive indicators for change, some are difficult to monitor and are not be relevant to LDP policies.
7. Without building in specific conditions in development policies relating to water quality, it is difficult to see how these can be meaningfully influenced by the LDP process, particularly how the LDP will be able to produce policies which will increase Biological River Quality or River Water Chemistry (?) levels. More meaningful would be indicators relating to buffer zones along water courses, sustainable drainage schemes, improvements to existing off-line drainage (e.g. non CSO drainage) etc.
8. CCW welcomes the indicators and targets for reducing water consumption but recommends inclusion of more quantitative targets in any final iteration of the plan - for example, all new developments over a certain size to contain grey-water systems, all local authority developments to include the listed features. We also recommend that these are linked to the predicted water resource demands (increases/decreases) of the various options.
9. CCW welcomes the inclusion of specific indicators and targets for minimising risk of and from flooding. We also welcome linking this to climatic factors and would also encourage the plan to look carefully at alternative approaches particularly those put forward in documents such as the Severn Estuary shoreline management plan and River Usk flood strategy.
10. While CCW supports the principle of increasing energy efficiency we recommend more meaningful indicators than for example increasing the use of low energy light bulbs (likely to become the default position before the plan comes into force) and provision of triple A rated white goods. Good indicators such as the number of new and existing homes meeting BREEAM good or excellent standards and number of households with access to sustainable and/or locally sourced energy. This should be linked to objective 13 where these are clearly set out.

11. CCW welcome an objective for renewable energy production, but would recommend an indicator that relates to the type and quality of scheme to be encouraged rather than a generic target for number of planning permissions received. This should be linked with energy efficiency measures (see above) and include careful consideration of any potentially negative environmental impacts (for example, local schemes such as CHP, solar water, ground source heat pumps being potentially more sustainable and easier to incorporate into the process than larger schemes).
13. CCW welcome the adoption of Ecohomes and BREEAM standards for sustainable developments.

Social

15. CCW welcomes the inclusion of indicators for physical activity under the improvement of health and well being, particularly those relating to allotments, and cycle routes. However, we recommend reference to specific targets relating to, for example, safe routes to school, accessible natural green space, and take up of outdoor recreation/use of recreational infrastructure by target groups (perhaps through support for initiatives such as the Come Outside! model or by referencing specific targets within the RoWIP).
16. CCW welcomes the inclusion of a possible indicator for "green space" but would strongly recommend the adoption of the targets set out in CCW's Accessible Natural Green Space Toolkit.
19. CCW welcomes an indicator for the application of the ASIDHOL methodology for developments with the potential to impact on the Gwent Levels historic landscape of outstanding interest.

Economic

23. CCW welcomes the inclusion of indicators for enhancing the tourism offer in Newport. However, we recommend specific indicators for the natural environment (such as the Wetland reserve) and historic landscape where appropriate. In addition, we do not feel that the presumption should be made that the length of the Monmouthshire and Brecon Canal returned to navigable use is necessarily a good sustainability indicator or one which is relevant to the plan. A more appropriate indicator would be one which looked at the canal in a more holistic sense and recognised its value to tourism through walking/cycling, nature conservation and other water based recreation as well as its function as a navigation route.
- 25 & 26 CCW welcome the inclusion of indicators for green travel planning and the incorporation of Sustrans routes within developments.