

# Newport City Council

Local Development Plan

Sustainability Appraisal/Strategic

Environmental Assessment:

Revised Scoping Report

# Newport City Council

## Local Development Plan Sustainability Appraisal/Strategic Environmental Assessment: Revised Scoping Report

**November 2008**

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# Consultation

This report is the Revised Scoping Report for the Newport Local Development Plan (LDP). The revised version of the report follows a consultation exercise, which lasted six weeks concluding on 22<sup>nd</sup> October 2008. The report integrates responses to the comments received, as outlined in Annex I.

It is important that the scope of the sustainability appraisal is appropriate for the documents being produced. For this reason consultation was a critical step in the scoping process.

The aim of the consultation on the Scoping Report was to involve and engage with statutory consultees and other key stakeholders on the proposed scope of the appraisal. In the light of the updated information contained therein, in particular, it sought to:

- ensure the SA is both comprehensive and robust enough to support the LDP during the later stages of full public consultation and examination;
- seek advice on the appropriateness of the sustainability objectives;
- seek advice on the appropriateness of the key sustainability issues; and
- seek advice on the comprehensiveness of the baseline data and gain further information where appropriate.

Prior to the publication of this Revised Scoping Report, two informal scoping workshops were undertaken in order that the Scoping Report previously issued for formal consultation was as reflective of the local sustainability issues as possible. The initial workshop involved officers from the council, as well as stakeholders from wider interest groups including the statutory consultees; and the second was intended to inform councillors of the process and seek views on issues in Newport. The results of the workshops were integrated into the Scoping Report issued for formal consultation, prior to the preparation of this Revised Scoping Report. Details are provided in Appendix B.

This Revised Scoping Report will be made available at Newport City Council Offices, all Council libraries and online at [www.newport.gov.uk/planningpolicy](http://www.newport.gov.uk/planningpolicy). Hard copies of the report can be obtained by contacting the Council's planning policy team on: 01633 656656.

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# Glossary of Terms

Term	Meaning / Definition
Ancient Woodland	Woodland which has been in existence since 1600.
Baseline	A description of the present and future state of an area, in the absence of any plan, taking into account changes resulting from natural events and from other human activities.
Consultation Body	An authority that, because of its environmental responsibilities, is likely to be concerned by the effects of implementing plans and programmes and must be consulted under the SEA Directive. The Consultation Bodies, designated in the SEA Regulations are the CCW, Cadw and Environment Agency Wales.
County Borough	Newport City Council is entitled as such, although the administrative area is described as a County Borough.
Environmental appraisal	A form of environmental assessment used in the UK (primarily for development plans) since the early 1990s, supported by 'Environmental Appraisal of Development Plans: A Good Practice Guide' (DoE, 1993); more recently superseded by sustainability appraisal. Some aspects of environmental appraisal foreshadow the requirements of the SEA Directive.
Environmental assessment	Generically, a method or procedure for predicting the effects on the environment of a proposal, either for an individual project or a higher-level "strategy" (a policy, plan or programme), with the aim of taking account of these effects in decision-making. The term "Environmental Impact Assessment" (EIA) is used, as in European Directive 337/85/EEC, for assessments of projects. In the SEA Directive, an environmental assessment means "the preparation of an environmental report, the carrying out of consultations, the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision", in accordance with the Directive's requirements.
Environmental Report	Document required by the SEA Directive as part of an environmental assessment, which identifies, describes and appraises the likely significant effects on the environment of implementing a plan or programme. See SA Report.
Important Wildlife Habitat	To protect priority habitats, a list has been drawn up at the UK level of 65 habitats requiring special protection totalling habitats and of these habitats, 55 occur in Wales. Looking after our habitats is important; habitats in good condition will benefit many species and provide 'nature benefits' to society including storing of carbon, mitigating flood damage and providing space for relaxation and wellbeing. <sup>1</sup>
Important Wildlife Species	To protect our rarer species, a list has been drawn up at the UK level of species requiring special protection totalling 1149 species and 504 of these species occur in Wales. A further 33 species together with three groupings of lichens and plants go to produce a list of species of principle importance in Wales. This is referred to as the Section 42 list. <sup>2</sup>

<sup>1</sup> Priority Habitats in Wales:

<http://www.biodiversitywales.org.uk/content/uploads/documents/Species%20Habitats/MASTER%20S42%20Habitats%20List%20150508.pdf>

<sup>2</sup> Section 42 species:

[http://www.biodiversitywales.org.uk/content/uploads/documents/Species%20Habitats/MASTER%20S42%20Species%20List%20150508%20Latin-English-Welsh\\_.pdf](http://www.biodiversitywales.org.uk/content/uploads/documents/Species%20Habitats/MASTER%20S42%20Species%20List%20150508%20Latin-English-Welsh_.pdf)

Indicator	A measure of variables over time, often used to measure achievement of objectives.
Mitigation	Used in this guidance to refer to measures to avoid, reduce or offset significant adverse effects.
Responsible Authority	In the SEA Regulations, means an organisation which prepares a plan or programme, subject to the SEA Directive, and is responsible for the SEA.
Scoping	The process of deciding the scope and level of detail of an SA, including the sustainability effects and options that need to be considered, the assessment methods to be used, and the structure and contents of the SA Report.
Significant effect	Effects which are significant in the context of the plan. (Appendix II of the SEA Directive gives criteria for determining the likely environmental significance of effects).
Sustainability Appraisal (SA)	Generic term used in this guidance to describe the form of assessment that considers social, environmental and economic effects, which fully incorporates the requirements of the SEA Directive.
SA Report	Document which identifies, describes and appraises the likely significant sustainability effects of implementing a plan or programme. It incorporates the Environmental Report required by the SEA Directive.
Valued Open Space	Open space that provides benefits to the local community through recreation; storm-water drainage; wildlife habitat; aesthetic benefits or relief from congestion and other negative effects of development.
Landscape Value	<p>The individual aspects of a landscape that are given a value based on set criteria where outstanding is equal to National importance, high to Regional importance, Moderate to local importance and low where there is a very low level of importance even locally.</p> <p>These aspects are Visual – what the landscape looks like; Earth Science – what is the geology and geomorphology of the landscape; Biodiversity - what plants grow on and what animals live in the landscape; History and Archaeology – what effect have people had on the landscape; and lastly Culture – what are the cultural influences which have helped shape the landscape. (LANDMAP)</p>
Woodland Management Scheme	Better Woodlands for Wales will grant aid the preparation of a management plan and it will also provide woodland owners with a wide range of grants to help them implement the plan in order to create and manage woodlands well. Owners wishing to enter the scheme will be given access to professional help from woodland managers who will be able to provide good advice about the scheme and prepare a management plan.

# 1. Introduction

## 1.1 Background

This document is the Revised Scoping Report for the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), of the Newport City Council Local Development Plan (LDP). Under the provisions of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for all Local Development Plans (LDPs). A SEA is also required under European Directive 2001/42/EC 'on the assessment of certain plans and programmes on the environment' (the 'SEA Directive'). The SA and SEA processes are combined to inform the preparation of the LDP.

The Newport City Council (NCC) Unitary Development Plan (UDP) was adopted in May 2006. The Council has now started the preparation of the LDP, which will replace the UDP upon adoption. The LDP will set out the Council's objectives and priorities for the development and use of land within the City for the period 2011-2026.

This Revised Scoping Report follows and integrates the results of the formal consultation on the Scoping Report (please refer to Annex I of this report), comprising the first stage of the SA/SEA for the Newport City Council LDP.

The Revised Scoping Report outlines the framework for the SA of the Newport LDP based on the identification and analysis of any plans and programmes of relevance to the study area, a description of the environmental, economic, and social baseline, and highlights any issues/problems and opportunities within the study area that the LDP may need to respond to.

Atkins was commissioned in March 2008 by NCC to undertake SA incorporating SEA of the Newport LDP. As part of this work, Atkins was also commissioned to undertake the Habitats Regulation Assessment (HRA) in parallel with the SA/SEA, as described in Section 1.6 of this report.

A Habitat Regulations Assessment is the assessment of the impacts of implementing a plan or policy on a Natura 2000 Site – in the context of NCC, this includes the Severn Estuary candidate Special Area of Conservation (cSAC) and the River Usk SAC. Its purpose is to consider the impacts of a land use plan against conservation objectives of the sites and to ascertain whether it would adversely affect the integrity of the sites. Where significant negative effects are predicted, alternative options should be considered to avoid any potentially damaging effects.

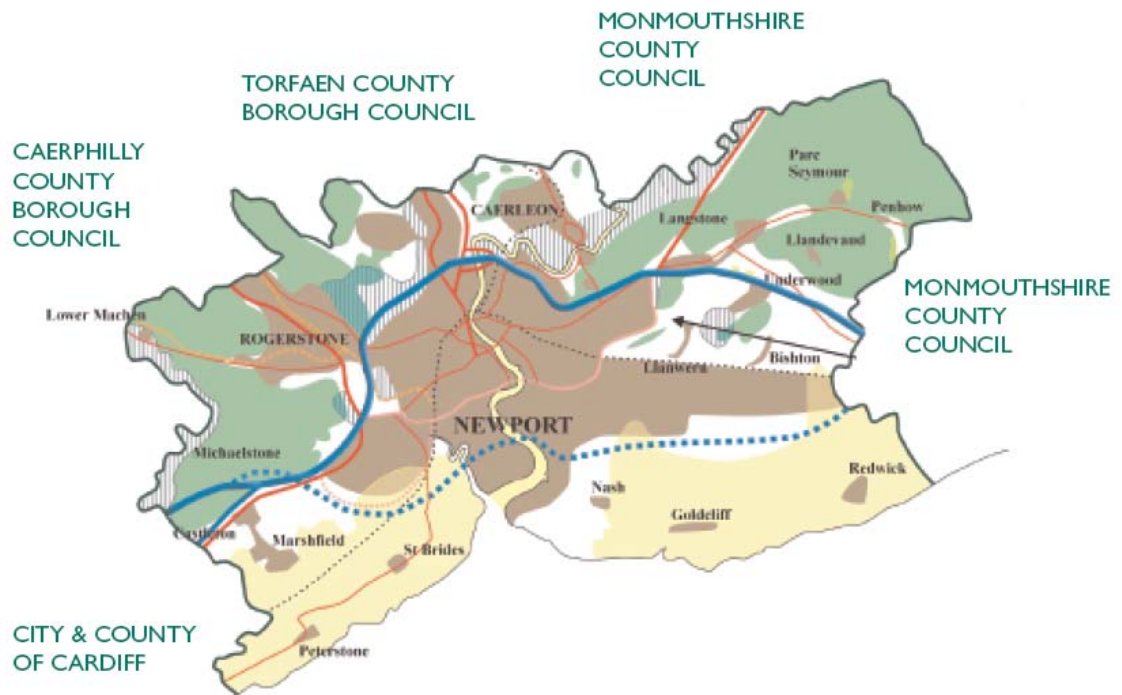
Although an initial desk based study has informed this Report, the screening exercise for the HRA, which can lead to an Appropriate Assessment (AA), will not commence until the development of LDP options, which runs in parallel to Stage B of the SA process (please refer to Figure 2.1 for details of the various stages of the SA/SEA process).



## 1.2 Study Area

Figure 1.1 demonstrates the plan area, including its key community areas and landscape features.

**Figure 1.1 – Newport City Council Area in Context**



Source: Newport City Council Waste Management Strategy 2004

## 1.3 Sustainable Development and Climate Change

The concept of sustainable development is central to the planning system. The term “sustainable development” has been used since 1987 following the publication of the World Commission on Environment and Development (WCED) report “Our Common Future”, commonly referred to as the Brundtland Report. It called for a strategy that united development and the environment – described by the now-common term “sustainable development”, which is defined as:

*‘Development that meets the needs of the present without compromising the ability of future generations to meet their own needs’ (Our Common Future, p42)*

In essence the term “sustainable development” not only refers to the impact of development on the environment, but also to society and the economy. In order for a development to be considered “sustainable” it must result in a win-win-win situation for the environment, society and the economy. Sustainable development is not about balancing these issues, but rather ensuring that none are adversely affected and, preferably, that there is a positive impact on all three.

The UK Government has produced a Sustainable Development Strategy, “Securing the Future. Delivering UK Sustainable Development Strategy” (March 2005). Priority areas for immediate action are outlined as:

- Sustainable consumption and production.
- Climate change and energy.
- Natural resource protection and environmental enhancement.
- Sustainable communities.

### Wales Environment Strategy 2008-2011<sup>3</sup>

Addressing climate change is a key priority of the Welsh Assembly Government. The One Wales document sets out the commitment to achieve a 3% reduction in carbon-equivalent emissions in areas of devolved competence by 2011, as well as commitments to improve energy efficiency across all sectors in Wales.

### Wales Climate Change Strategy

Under Section 79 of the Government of Wales Act 2006, Welsh Ministers have a legal duty to have a Scheme setting out how they propose to promote sustainable development. The Wales Climate Change Strategy will be developed for consultation in 2009. It will set out how the Welsh Assembly Government will deliver the One Wales commitments. It will set targets for reduction in emissions and outline action needed for adaptation to the impact of climate change. Once this has been published, the next iteration of the SA/SEA will integrate its recommendations and targets.

## 1.4 Strategic Environmental Assessment and Sustainability Appraisal

The EU Directive 2001/42/EC on assessment of effects of certain plans and programmes on the environment (the 'SEA Directive') came into force in the UK on 20 July 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004. The Directive applies to a variety of plans and programmes, including those for town and country planning and land use and applies to LDPs as they a) set the framework for future development consent and b) are likely to have a significant effect on the environment.

The overarching objective of the SEA Directive is:

*"To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment."* (Article 1)

SEA is an iterative assessment process that plans and programmes are required to undergo as they are being developed to ensure that potential significant environmental effects arising from the plan/programme are identified and assessed, mitigation is proposed and findings communicated to plan-makers to enable improvements to be made to the LDP. SEA also requires the monitoring of significant effects once the plan/programme is implemented.

The SEA Directive and associated UK Regulations state that the SEA must consider the following topic areas:

- Biodiversity
- Population
- Human Health
- Flora and Fauna
- Soil
- Water
- Air
- Climatic factors
- Material assets

<sup>3</sup> <http://new.wales.gov.uk/desh/publications/enviroprotect/environmentactionplan/esap0811e.pdf?lang=en>

- Cultural heritage, including archaeological and architectural heritage
- Landscape
- and the interrelationship between these factors

Under the regulations implementing the provisions of the Planning and Compulsory Purchase Act 2004, a SA is required for all LDPs in Wales. The purpose of SA is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The Regulations<sup>4</sup> stipulate that SAs of LDPs should meet the requirements of the SEA Directive.

## 1.5 The SA Process

The requirements to carry out SA and SEA are thus distinct, but the Welsh Assembly Government (WAG) guidance for LDPs concurs with the ODPM's SA guidance<sup>5</sup> in stating that it is possible to satisfy both through a single appraisal process (commonly designated as SA/SEA<sup>6</sup>) and provides methodologies and guidance for doing so. This methodology goes further than the SEA methodology (which is primarily focused on environmental effects), requiring the examination of all the sustainability-related effects, whether they are social, economic or environmental. However, those undertaking the SA should ensure that in doing so they meet the requirements of the SEA Directive. This report will therefore integrate both the SA and SEA requirements, and subsequent reference to SA in this document will be taken to mean SA incorporating SEA.

SA ensures that social, environmental and economic concerns are addressed and fully integrated into the production of a planning document and that integration of these issues is achieved as far as possible.

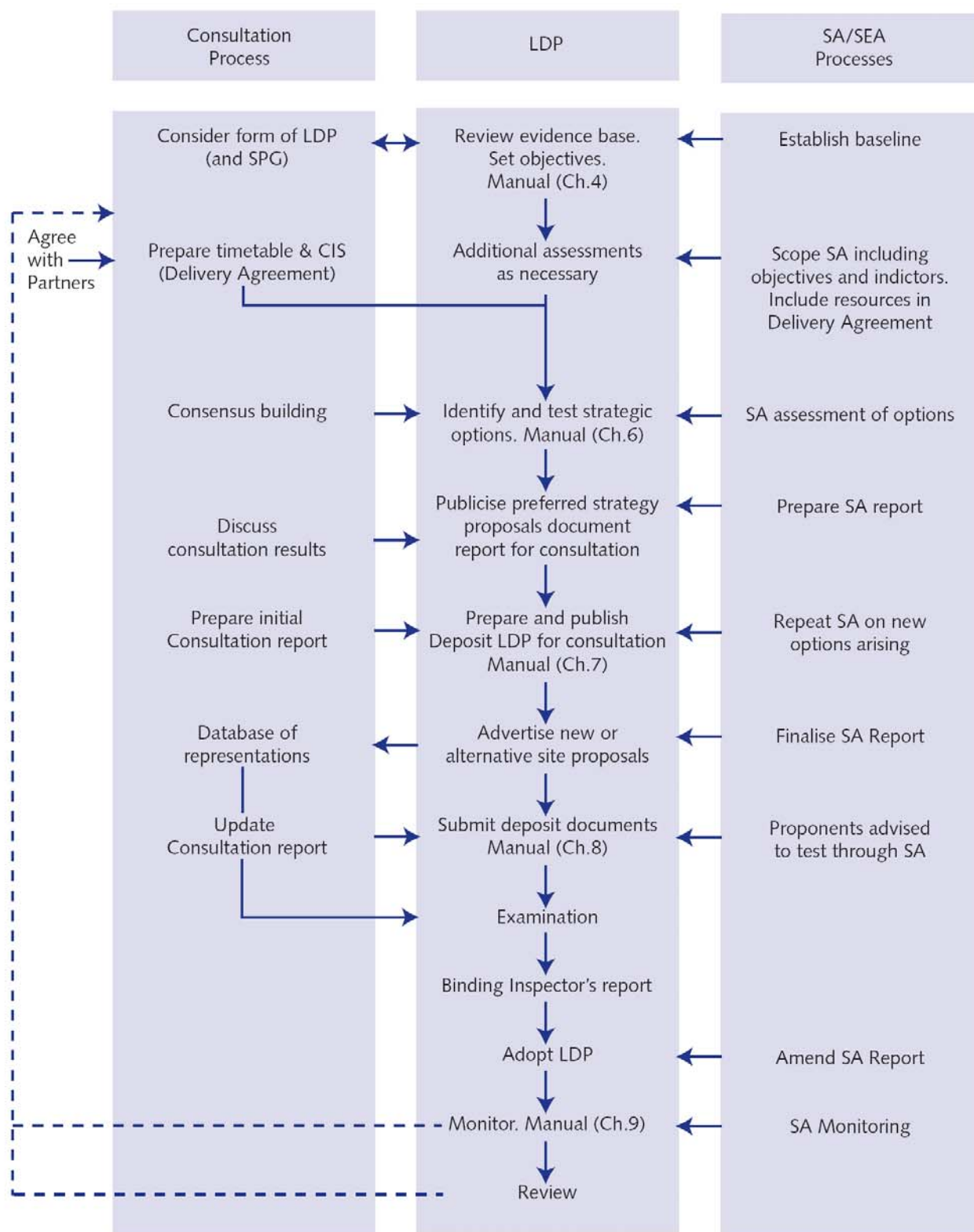
SA is an iterative process that takes place alongside the preparation of a planning document. This is to ensure that the principles of sustainable development are integrated into the plan-making process, thus ensuring that the resulting policies and proposals produce sustainable development when implemented. Through consultation and the involvement of stakeholders and specialist experts in the process, the resulting appraisal should be both robust and fully integrated.

Figure 1.2 sets out the various stages, tasks and relationships with the plan preparation contained in the WAG/ODPM guidance, which are being applied to the SA of the Newport City Council LDP.

<sup>4</sup> Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (S.I. 2004/1656 (W/170)) ("the Wales Regulations").

<sup>5</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Guidance for Regional Bodies and Local Planning Authorities, ODPM, November 2005.

<sup>6</sup> The term SA is used to denote the combined SA/SEA process in this Scoping Report.

**Figure 1.2 – Incorporating SA/SEA within the LDP Process**

N.B. Plan preparation, SA and consultation should be undertaken in an integrated manner.

Source: WAG LDP Manual 2006, p29

### 1.5.1 Purpose of the Scoping Report

The overarching purpose of a Scoping Report is to create the general framework for the assessment of the Newport LDP. This report is the Revised Scoping Report for the Newport LDP. It has been refined in response to consultation comments and provides information on:

- Other relevant plans, programmes and sustainability objectives;
- Baseline information;
- Sustainability issues identification;
- Framework for appraising likely significant effects arising from the LDP; and
- Proposed structure and level of detail of the final Sustainability Appraisal Report.

## 1.6 Habitats Regulations Assessment

Under the Habitats Regulations, it is necessary to assess whether the Newport LDP is likely to have a significant effect upon a European Site. The authority contains the River Usk, a Special Area of Conservation (SAC) designated under the EC Habitats Directive. The section within NCC falls within the River Usk (Lower Usk) Site of Special Scientific Interest (SSSI). Newport sits on the western bank of The Severn Estuary, which is recognised through its designation as a Ramsar Site, a Special Protection Area (SPA) as well as a candidate SAC (cSAC). These sites support internationally important plant and animal communities. Potential effects on internationally protected sites outside the plan area, for example the River Wye SAC that may be affected by development within the plan area should also be regarded within the HRA.

Draft WAG guidance<sup>7</sup> states that:

*'One of the principal requirements of the Habitats Regulations is that before the LPA adopts a development plan, it must consider the potential effects of the plan on European sites in Great Britain... The whole process of considering the effects of a development plan on European sites is referred to in this guidance as the 'Habitats Regulations Assessment' (HRA), to clearly distinguish the whole process from the step within it commonly referred to as the 'appropriate assessment' (AA).*

Therefore the LDP must be subject to a Habitats Regulations Assessment (HRA). If the first stage of the HRA indicates that a significant effect is likely to be predicted on the European Sites, then it will be necessary to undertake an Appropriate Assessment (as required by Article 6(3) of the Habitats Directive and regulation 85B of the draft Regulations), which will examine the impacts of the LDP against the conservation objectives of the European Sites. The Assessment must determine whether the LDP would adversely affect the integrity of the site in terms of its nature conservation objectives.

The Draft WAG guidance<sup>8</sup> states that:

*'Sustainability Appraisal (SA) and Environmental Assessment of plans (SEA) are also iterative processes in the production of a development plan... The HRA should be programmed to fit in with existing plan-making procedures, including the SEA, wherever possible... However, HRA should not be incorporated into the SA or SEA. It should be run in parallel with these processes and records, and even if integrated with SA or SEA Environment reports, kept clearly distinguishable.'*

The WAG LDP Manual<sup>9</sup> intends that 'appropriate assessment will be integrated with development plan Sustainability Appraisal, incorporating SEA.' To date, the HRA data collection and desk

<sup>7</sup> David Tyldesley and Associates and the Welsh Assembly Government, October 2006, Draft Annex to TAN5 Nature Conservation and Planning: The Assessment of Development Plans Under the Provisions of the Habitats Directive.

<sup>8</sup> David Tyldesley and Associates and the Welsh Assembly Government, October 2006, Draft Annex to TAN5 Nature Conservation and Planning: The Assessment of Development Plans Under the Provisions of the Habitats Directive.



based review work has been completed and the findings incorporated into the SA through integration of details relating to qualifying features of the SACs and cSAC, current conditions and conservation objectives in the baseline data (see Section 3 and Appendix A), derivation of issues and identification of appropriate objectives and indicators within the SA Framework.

In the case of the NCC LDP, a screening document will be produced to assess the potential impacts of the policies within the plan on the River Usk SAC and the Severn Estuary cSAC, SPA and Ramsar site.

The SA is currently at Stage A (Scoping). It is considered that whilst there has been input from ecologists in advising the SA, the HRA screening document will not start until there are more firm aspects of the plan for the screening document to assess.

When the LDP Policy Options are produced, there will be a meeting between Atkins, the Council, Countryside Council for Wales (CCW) and key consultees to discuss both how to take the HRA forward; and to ensure that the recommendations are in line with those made by the SA. As the plan develops further, the SA and HRA will both be linked in order to ensure that the LDP policies are developed so as to consider the impacts of the plan on the two Natura 2000 sites.

The results of the AA, if required, will be integrated into the SA as they both develop.

## 1.7 Requirements for consultation during a Sustainability Appraisal

Authorities which, because of their environmental responsibilities, are likely to be concerned by the effects of implementing the plan or programme, must be consulted on the scope and level of detail of the information to be included in the Sustainability Appraisal. These are termed the statutory Consultation Bodies, and in Wales comprise CCW, Environment Agency (Wales) (referred to as EA) and Cadw (Historic Environment Service of the Welsh Assembly Government). It is considered good practice to consult with other appropriate social and economic consultees who would have a significant influence upon, or would be influenced by the LDP.

The public and Consultation Bodies must be consulted on the LDP and the Sustainability Appraisal Report at a later stage.

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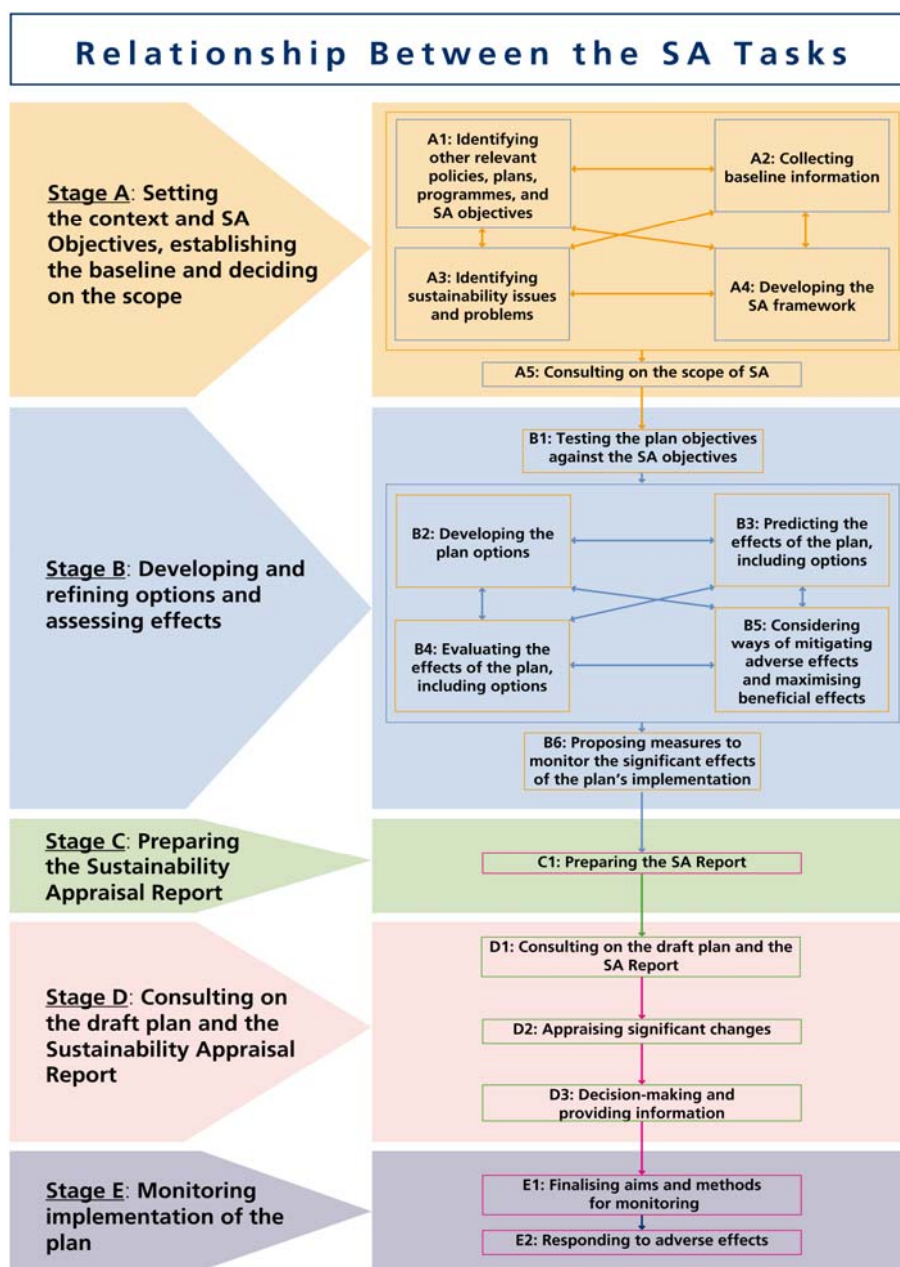
<sup>9</sup> Welsh Assembly Government 2006, *Local Development Plan Manual*

## 2. Navigation of the Report

SA/SEA is a complex process that follows a number of sequential stages. This report has been structured to reflect the way in which work has been undertaken, presenting a logical progression through the various tasks that local authorities must complete in order to satisfy the formal requirements. This sequence of tasks is presented in Figure 2.1.

The work presented in this report represents the findings of Tasks A1 – A4 in Stage A, with the process of Scoping Report consultation forming Task A5. As this document forms the Revised Scoping Report, the findings of Task A5 are also incorporated. Figure 2.1 can also be used as a cross-reference to support the description of the subsequent stages (B-E) of the process that are outlined later in the Scoping Report.

Figure 2.1 – Relationship between the SA Tasks



In addition to the Scoping Report, the current guidance also sets out a requirement for the preparation of the Sustainability Appraisal Report (documenting work in Stages A, B and C), which should be used in the public consultation on the Preferred Options of the LDP.

## 2.1 Navigating between the Tasks

The structure of this report has been designed to enable the reader to distinguish easily between the different tasks and how they relate back to the overall process. In order to achieve this, colour coding has been applied as follows and is used throughout the report to assist in navigation:

**A1 – Identifying other relevant policies, plans and programmes and SA objectives**

**A2 – Collecting baseline information**

**A3 – Identifying sustainability issues and problems**

**A4 – Developing the SA Framework**

**A5 – Consulting on the scope of SA**



### 3. Identifying other plans and programmes and sustainability objectives

#### 3.1 Task A1

The first task of a Sustainability Appraisal (SA) is the identification of other relevant plans, programmes and sustainability objectives. The LDP is prepared in the context of other plans and programmes, which need to be taken into account. The LDP must comply with national planning policy, and reflect other local plans and strategies, providing the spatial planning framework to help deliver those strategies.

The SEA Directive specifically states that information should be provided on:

*“The relationship [of the plan or programme] with other relevant plans and programmes”*

*“The environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”*

##### 3.1.1 Methodology

Both the Local Development Plan and the SA Scoping Report should be set in the context of national, regional and local objectives along with strategic planning, transport, social, economic and environmental policies. This being the case, a comprehensive review of all available relevant plans, policies and programmes (PPPs) was carried out as part of the SA scoping process. This ensures that the objectives in the Scoping Report generally adhere to, and are not in conflict with, objectives found in other PPPs and also assists in the setting of sustainability objectives for the SA. It can also be used to ascertain potential conflicts between objectives, which may need to be addressed as part of the process. In order to fully assess relevant PPPs, a list was drawn up by the Council using the ODPM SA guidance and local knowledge. For the purposes of comprehensiveness, higher tier PPPs were included in the list to show the hierarchy and relationships between the various plans, policies and programmes.

The plans and programmes are listed below in Table 3.1.

**Table 3.1 – Review of Relevant Plans, Policies and Programmes**

Relevant Plans, Policies and Programmes
International and European level
The Johannesburg Declaration on Sustainable Development (2002)
The Kyoto Protocol on Climate Change (1997)
UN Framework Convention on Climate Change
Convention on Biological Diversity (1992)
Rio Declaration on Environment and Development, Statement of Principles for the Sustainable Management of Forests and Agenda 21 (1992)
Aarhus Convention (1998)
Public Sector Information (PSI) Directive 2003/98/EC on the Re-Use of Public Information
Environmental Liability Directive 2004/35/EC

Relevant Plans, Policies and Programmes
European Spatial Development Perspective (97/150/EC)
European Sustainable Development Strategy (2001)
EU Ambient Air Quality Directive (96/62/EC)
EU Habitats Directive (92/43/EEC)
EU Wild Birds Directive (79/409/EEC)
EU Directive on Environmental Noise (02/49/EC)
EU Framework Directive on Waste (91/156/EEC)
EU Landfill Directive (99/31/EC)
EU Water Framework Directive (00/60/EC)
EC Freshwater Fish Directive (78/659/EEC)
EU Sixth Environmental Action Plan (2002)
EU Soil Framework Directive 2006
European Landscape Convention ratified 2006
Energy Performance in Buildings Directive 2002/91/EEC
European Nitrates Directive (1991)
EU Groundwater Daughter Directive 2006/118/EC
EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment
EU Rural Development Policy 2007-2013
European Common Agricultural Policy (Reform 2003)
European Employment Strategy (2002)
Renewable Energy Coalition (2002)
Intelligent Energy Europe 2007-2013
European Physical Activity
National Level
Wales – A better Country – The Strategic agenda of WAG September 2003
UK Sustainable Development Strategy –‘Securing the Future’ 2005
Habitats and Species of Principal Importance for the Conservation of Biological Diversity (Wales Biodiversity Partnership 2003) – Section 42 List
Farming for the Future (DEFRA)
Welsh Assembly Government - Planning Policy Wales (PPW) 2002
Ministerial Interim Planning Policy Statement (MIPPS) 01/2005 Planning for Renewable Energy
MIPPS 02/2005 Planning for Retailing and Town Centres
MIPPS 01/2006 Housing
MIPPS 01/2008 Planning for Good Design
The Town and Country Planning (LDP) (Wales) Regulations 2005

Relevant Plans, Policies and Programmes
The Six Acre Standard – Minimum Standards for Outdoor Playing Space 1992
Wales Biodiversity Framework 2006
Road Traffic Reduction Act 1997
Climbing Higher – The Wales Assembly Government Strategy for Sports and Physical Activity 2005
Welsh Assembly Government Play Policy 2002
NHS – Exercise Referral Systems: A National Quality Assurance Framework 2001
Draft Economic Development Strategy 2008-2011
National Tourism Strategy for Wales 2000
DTI Energy White Paper “Our Energy Future – Creating a Low Carbon Economy” 2003
Welsh Assembly Government – A Fuel Poverty Commitment for Wales
Review of Energy Policy in Wales 2002
Welsh Assembly Government – Starting to Live Differently: The Sustainable Development Scheme of the National Assembly for Wales 2004
Energy Saving Wales – Energy Efficiency Action Plan 2004
One Future, Different Paths – The UK's Shared framework for Sustainable Development 2005
People, Places, Futures – The Wales Spatial Plan Update Consultation 2008
A Winning Wales – The National Economic Strategy of the Welsh Assembly Government 2004
Technical Advice Notes (TANs) – TAN1- Joint Housing Land Availability Studies 2006, TAN2 – Planning and Affordable Housing 2006, TAN3 – Simplified Planning Zones 1996, TAN4 - Retailing and Town Centres 1996, TAN5 – Nature Conservation and Planning, TAN 5 Nature Conservation and Planning Consultation Version 2006, 1996, TAN6 – Agriculture and Rural development 2000, TAN7 – Outdoor Advertisement Control 1996, TAN8 – Renewable Energy 2005, TAN9 – Enforcement and Planning Control 1997, TAN10 – Tree Preservation Orders 1997, TAN11 – Noise 1997, TAN12 – Design 2002, TAN13 – Tourism 1997, TAN14 – Coastal Planning 1998, TAN15 – Development and Flood Risk 2004, TAN16 – Sport and Recreation 1998, TAN18 – Transport 2007, TAN19 – Telecommunications 2002, TAN20 – The Welsh Language – UDPs and Planning Control 2000, TAN21 – Waste 2001
Minerals Planning Policy Wales 2001
Minerals TAN 1 – Aggregates 2004
National Housing Strategy – Better homes for People in Wales 2001
UK Biodiversity Action Plan 2005
Countryside and Rights of Way Act 2000
One Wales: Connecting the Nation – The Wales Transport Strategy 2008
Sports Tourism in Wales: A Framework for Action 2004
Action Plan for the Countryside Experience 2004
Achieving Our Potential 2006-2013 – Strategic Action Plan
Cultural Tourism Strategy for Wales 2003
Climbing Higher – WAG Strategy for Sport and Physical Activity 2003

Relevant Plans, Policies and Programmes
Well Being In Wales 2002
Water Resources for the future: Strategy for England and Wales 2001
Environment Strategy for Wales and Action Plans 2006
Wise about Waste: The National Waste Strategy for Wales 2002
Our Energy Future – Energy White Paper 2003
Walking and Cycling Strategy for Wales 2003
Wales Programme for Improvement – Dec 2005
Building a Future for Wales – A Sustainable Housing Strategy 2005
A Working Countryside for Wales – Rural White Paper 1996
The Sustainable Development Action Plan – 2004-2007
Woodlands for Wales 2006
Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007
The 1995 Home Energy Conservation Act (HECA)
White Paper on Sport 2007
Sport Playing Its Part: Meeting the Needs of Children and Young People Healthier Communities Economic Vitality and Workforce Development Safe, Strong and Sustainable Communities The Contribution of Sport to Economic Vitality and Workforce Development
Regional level
South East Wales Regional Waste Plan 2004
South East Wales Regional Planning Guidance 2001
Property Strategy for Employment in Wales (2004-2008)
Five Counties Regeneration Framework 2002
South East Wales Development Strategy – Enter the dragon 2005
A Revised Tourism Strategy for South East Wales August 2003
Monmouthshire UDP 2006
Caerphilly County Borough (Council Approved) UDP (2003)
Blaenau Gwent Unitary Development Plan 2006
Torfaen Local Plan 2000
City of Cardiff Local Plan 1996
South Glamorgan Replacement Structure Plan 1991-2011 (1997)
The Severn Estuary Shoreline Management Plan 2000

Relevant Plans, Policies and Programmes
South East Wales Transport Alliance (SEWTA) – Regional Transport Plan (Consultative Draft) 2008
River Usk Catchment Abstraction Management Strategy (CAMS) 2007
Housing Needs Survey 2002
Outline of the Regional Transport Plan, SEWTA, January 2007
Local level
Newport Unitary Development Plan 2006
Unlimited Vision: Newport 2020 A Masterplan for Central Newport 2006
<p>Supplementary Planning Guidance:</p> <p>Accessibility Design Guide - Supplementary Planning Guidance</p> <p>Alway Regeneration Area Development Brief - Supplementary Planning Guidance</p> <p>East Newport Development Framework Plan - Draft SPG</p> <p>Nature Conservation Strategy (Draft SPG) for Newport City Council</p> <p>Affordable Housing Draft Supplementary Planning Guidance</p> <p>Eastern Expansion Area Supplementary Planning Guidance - Consultation Responses</p> <p>Eastern Expansion Area Supplementary Planning Guidance - Final Document May 2007</p> <p>Eastern Expansion Area Supplementary Planning Guidance - Statement of Consultation</p> <p>Flood Risk &amp; Sustainable Drainage Systems Supplementary Planning Guidance</p> <p>House Extensions Supplementary Planning Guidance</p> <p>Newport City Centre Masterplan Draft SPG</p> <p>Newport Old Town Dock Development Brief: Supplementary Planning Guidance</p> <p>Newport Public Realm Strategy - Draft Supplementary Planning Guidance</p> <p>Parking Guidelines - including revised Central Area requirement</p> <p>Planning Obligations Supplementary Planning Guidance - Adopted</p> <p>Residential Design Guide Supplementary Planning Guidance</p> <p>Rodney Parade Development Brief - Supplementary Planning Guidance</p> <p>Security Measures for Shopfronts &amp; Commercial Premises -Supplementary Planning Guidance</p> <p>Supplementary Planning Guidance on Flat Conversions and Houses in Multiple Occupation</p> <p>Supplementary Planning Guidance Outdoor Play Space Provision</p> <p>Town Centre Shopfront Policy SPG</p> <p>Inquiry Topic Paper: Developing in Flood Risk Areas October 2004</p>
Newport City Council Draft Rights of Way Improvement Plan 2008
<p>Unitary Development Plan Supporting Documents:</p> <ul style="list-style-type: none"> <li>• Sustainability Appraisal - 2nd Proposed Changes</li> <li>• Sustainability Appraisal – 3rd Proposed changes</li> </ul>
Economic Development Strategy 2003-2008
Draft Newport Tourism Strategy 2004-2008
Contaminated Land Inspection Strategy 2002
Air Quality Action Plan for Newport Final Draft Version 2.0 July 2007

Relevant Plans, Policies and Programmes
A Local Biodiversity Action Plan for Newport Draft Under Review 2008
Landscape Strategy: Landscape working for Newport Volumes 1,2,3,5 2006
Assessment of open space provision – Newport 2006
Newport Children and Young People's Plan 2008-2011
'Leading a Fulfilled and Healthy Life': A Health, Social Care and Wellbeing Strategy for Newport 2008 – 2011
Community Strategy Building our Future Together 2005 - 2015
Newport Local Housing Strategy 2007
Energy Conservation Strategy next updated 2006/07
Preparation of an Affordable Warmth Strategy and Fuel Poverty strategy
Newport City Council Waste Management Strategy March 2004
Joint Housing Availability Study for Newport 2004
Newport Community Safety Partnership Plan 2008-2011

### 3.1.2 Results

Social, environmental and economic objectives and sustainability issues of relevance to the sustainability appraisal and the preparation of the LDP have been used to formulate a general, first set of sustainability 'themes' (split into the three dimensions of sustainable development: social, environmental and economic), which the sustainability objectives will encompass. This is presented in Table 3.2 where the relationship between the final SA objectives and the sustainability 'themes' is shown in the far right column. The table also shows the implications arising for the LDP and the link between these objectives and the SEA topic areas. Identifying other relevant plans, policies and programmes and their objectives is task A1 of the SA process.

Table 3.2 – Sustainability Themes linked to final SA Objectives

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
Environmental						
Protect and enhance biodiversity	Convention on Biological Diversity, The EU Biodiversity Strategy, Convention on Biological Diversity, EU Habitats Directive, EC Freshwater Fish Directive, Agenda 21, Rio Declaration on Environment and Development, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, Environmental Liability Directive	PPW, TAN5 – Nature Conservation and Planning and TAN 5 Nature Conservation and Planning Consultation Version,, UK Biodiversity Action Plan, Woodlands for Wales, Environment Strategy for Wales, The UK’s Shared framework for Sustainable Development, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, River Usk CAMS, Wales Biodiversity Framework, Habitats and Species of Principal Importance for the Conservation of Biological Diversity – Section 42 List, Starting to Live Differently	Newport Unitary Development Plan 2006, Nature Conservation Strategy (Draft SPG), Local Biodiversity Action Plan	Policies should positively contribute to wider biodiversity and connectivity between sites of biodiversity importance and significance.	Biodiversity; Flora and Fauna; Landscape	2
Identify, manage and protect habitats and	Johannesburg Declaration on	PPW, TAN5 – Nature Conservation and Planning and TAN 5 Nature	Newport Unitary Development Plan	Policies should protect and	Biodiversity; Flora and	2

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
<b>species which are important on a international, national and local scale</b>	Sustainable Development, European Sustainable Development Strategy, Convention on Biological Diversity, The EU Biodiversity Strategy Statement of principles on forests, EU Habitats Directive, The EU Directive on the Conservation of Wild Birds, EC Freshwater Fish Directive, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment,	Conservation and Planning Consultation Version,, UK Biodiversity Action Plan, Environment Strategy for Wales, Woodlands for Wales, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, Wales Biodiversity Framework, Habitats and Species of Principal Importance for the Conservation of Biological Diversity – Section 42 List, Staring to Live Differently	2006, Nature Conservation Strategy (Draft SPG), Local Biodiversity Action Plan	enhance important habitats and species	Fauna; Landscape	



Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
	Agenda 21, Rio Declaration on Environment and Development, Statement of Principles of Forests, Environmental Liability Directive					
<b>Minimise the effects of Noise Pollution</b>	EU Directive on Environmental Noise, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, Environmental Liability Directive	PPW, TAN11 – Noise, Environment Strategy Wales, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan	Newport Unitary Development Plan 2006,	Policies should minimise noise creation and separate noise sensitive uses from noise generating uses.	Human Health; Population	<b>6</b>
<b>Reduce air pollution and ensure improvements in air quality</b>	EU Ambient Air Quality Directive, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, Environmental Liability Directive	PPW, Environment Strategy Wales, Air Quality Strategy for the UK, the transport framework for Wales, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local	Newport Unitary Development Plan 2006, Air Quality Action Plan, Waste Management Strategy	Policies should reduce air polluting uses	Human Health; Population	<b>4, 5</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
		Plan, South Glamorgan Replacement Structure Plan, Regional Transport Plan (Consultative Draft)				
<b>To improve the energy efficiency of housing</b>	European Sustainable Development Strategy, Intelligent Energy Europe	Home Energy Conservation Act, Building a Future for Wales – A sustainable housing strategy, The UK's Shared framework for Sustainable Development, Energy Saving Wales – Energy Efficiency Action Plan, DTI Energy White Paper, Review of Energy Policy in Wales, Starting to Live Differently	Local Housing Strategy	Policies should seek to encourage energy efficient design	Human Health, Climatic Factors, Population, Material Assets	<b>10</b>
<b>Reduce the risk of flooding by assessing developments against the precautionary principle, and promote protection of floodplains from inappropriate development</b>	The EU Water Framework Directive, European Sustainable Development Strategy, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment	PPW, TAN15 - Development and Flood Risk, Severn Estuary Shoreline Management Plan, Water resources for the future: Strategy for England and Wales, The UK's Shared framework for Sustainable Development, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications	Newport Unitary Development Plan, Inquiry Topic Paper: Developing in Flood Risk Areas, Flood Risk & Sustainable Drainage Systems Supplementary Planning Guidance	Policies should prevent sensitive development in identified flood risk areas. Policies should safeguard against increased risk of flooding and adapt to the predicted effects of climate	Water, Human Health, Material Assets	<b>7, 8, 9</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
				change.		
<b>Encourage sustainable use, enjoyment and management of the countryside</b>	European Sustainable Development Strategy, European Landscape Convention, EU Rural Development Policy	Countryside and Rights of Way Act, The Sustainable Development Action Plan, Action Plan for the Countryside Experience, Revised Tourism Strategy for South East Wales, TAN 6- Agriculture and Rural development, Rural White Paper, Sport Playing Its Part, PPW, Farming for the Future, Starting to Live Differently	Newport Unitary Development Plan, Draft Rights of Way Improvement Plan; Nature Conservation Strategy (Draft SPG), Landscape working for Newport	Policies should promote access and use of the countryside	Population	1 2
<b>Promote protection and enhancement of valued landscape character</b>	European Landscape Convention, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, EU Rural Development Policy, Environmental Liability Directive	TAN 6- Agriculture and Rural development, Severn Estuary Shoreline Management Plan, Rural White Paper, Woodlands for Wales, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, PPW, Farming for the Future, Starting to Live Differently	Newport Unitary Development Plan, Draft Rights of Way Improvement Plan; Nature Conservation Strategy (Draft SPG), Local Biodiversity Action Plan, Waste Management Strategy, Landscape working for Newport		Landscape; Cultural Heritage	1, 2
<b>Reduce pollution of watercourses,</b>	The EU Nitrates Directive, The EU	Water Resources for the Future: Strategy for England and Wales,	Newport Unitary	Policies should ensure	Water; Human	4, 5, 7,

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
<b>groundwater and improve poor water quality</b>	Water Framework Directive, EU Groundwater Daughter Directive, EC Freshwater Fish Directive, Agenda 21, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, Environmental Liability Directive	Severn Estuary Shoreline Management Plan, UK Sustainable Development strategy, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, River Usk CAMS, Starting to Live Differently	Development Plan, Contaminated Land Strategy; Nature Conservation Strategy (Draft SPG), Local Biodiversity Action Plan, Waste Management Strategy, Flood Risk & Sustainable Drainage Systems Supplementary Planning Guidance	development is adequately drained	Health	<b>9, 12</b>
<b>To ensure prudent use of land and other resources</b>	European Sustainable Development Strategy, Agenda 21, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, Statement of Principles of Forests, EU Rural Development Policy, Environmental Liability Directive	TAN1 – Joint Housing Land Availability Study, PPW; Wales Spatial Plan, PPW, Farming for the Future, Starting to Live Differently	Newport Unitary Development Plan, Contaminated Land Strategy, Local Biodiversity Action Plan, Waste Management Strategy	Policies should promote sequential approach to development encouraging development of Previously Developed Land (PDL) as well as develop a sustainable land use pattern and promote	Population; Human Health; Climatic Factors, Cultural Heritage	<b>1, 13</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
				minimum development densities.		
<b>Encourage the use of more sustainable forms of transport, reducing the need to travel by car</b>	European Sustainable Development Strategy,	The Transport Framework for Wales, PPW, TAN18, Walking and Cycling Strategy for Wales; Wales Spatial Plan, The UK's Shared framework for Sustainable Development, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, Regional Transport Plan (Consultative Draft), One Wales: Connecting the Nation – The Wales Transport Strategy, Starting to Live Differently	Newport Unitary Development Plan, Draft Rights of Way Improvement Plan, Air Quality Action Plan, Waste Management Strategy	Policies should provide opportunities to access new and existing developments by a range of travel modes as well as develop a sustainable land use pattern and promote minimum development densities.	Population; Human Health; Climatic Factors; Air	<b>25, 26</b>
<b>Encourage walking and cycling</b>		Walking and Cycling Strategy for Wales, White Paper on Sport, Regional Transport Plan (Consultative Draft), Sport Playing Its Part, One Wales: Connecting the Nation – The Wales Transport	Newport Unitary Development Plan, Draft Rights of Way Improvement Plan	Policies should enable the provision of effective cycling connections.	Air, Climatic Factors, Human Health	<b>16, 23, 25, 26</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
		Strategy, Starting to Live Differently				
<b>Reduce traffic congestion to protect the environment and human health</b>	EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment	The Transport Framework for Wales, PPW, TAN18 - Transport, Walking and Cycling Strategy for Wales, White Paper on Sport, Regional Transport Plan (Consultative Draft), One Wales: Connecting the Nation – The Wales Transport Strategy, Road Traffic Reduction Act	Newport Unitary Development Plan, Draft Rights of Way Improvement Plan; Community Strategy, Air Quality Action Plan	Policies should seek to minimise the need to travel by allowing access to services locally	Air; Climate; Human Health	3, 4, 5, 6, 10, 25, 26
<b>Address the causes of climate change and promote the reduction of Greenhouse gas emissions</b>	Johannesburg Declaration on Sustainable Development, Kyoto agreement, The EU Sixth Environmental Action Plan, European Sustainable Development Strategy, United Nations Framework Convention on Climate Change, European Climate Change Programme, The EU Air Quality Framework Directive Agenda 21, EU Directive 97/11/EC	UK Sustainable Development Strategy, Environment Strategy Wales, Air Quality Strategy for England, Scotland, Wales and Northern Ireland; Wales Spatial Plan, Building a Future for Wales – A sustainable housing strategy, The UK's Shared framework for Sustainable Development, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Regional Transport Plan Regional Transport Plan (Consultative Draft), Farming for the Future, MIPPS 01/2005 Planning for Renewable Energy, DTI Energy White Paper, Starting	Community Strategy, Draft Air Quality Strategy, Local Biodiversity Action Plan, Waste Management Strategy	Policies should aim to reduce the causes of climate change by reducing greenhouse gas emissions associated with aspects of new developments and transportation.	Air; Climatic Factors	4, 5, 11, 25, 26

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
	amending Directive 85/337/EEC on Environmental Impact Assessment, UN Framework Convention on Climate Change	to Live Differently				
<b>Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management</b>	The EU Landfill of Waste Directive, EU Waste Framework Directive, European Sustainable Development Strategy, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, Environmental Liability Directive	Environment Strategy Wales, Wise about Waste: The National Strategy for Wales, The UK's shared framework for Sustainable Development, TAN21 – Waste, PPW, South East Wales Regional Waste Plan, WSP, Wales a better Country; Wales Spatial Plan, Starting to Live Differently	Newport Unitary Development Plan, Waste Management Strategy	Policies should promote the minimising of waste in new developments as well increasing opportunities for recycling and reducing the amount of waste that is sent to landfill	Population, Air, Climatic Factors	<b>3, 10, 11</b>
<b>Increase energy efficiency and promote renewable energy production and use</b>	European Sustainable Development Strategy, EU Directive on Energy performance of buildings, Kyoto protocol on climate change, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental	UK Sustainable Development Strategy – Securing the future, WSP, Wales a better country, PPW, TAN8 – Renewable Energy, Our energy future – Energy White Paper; Wales Spatial Plan, Building a Future for Wales – A sustainable housing strategy, Regional Transport Plan, Regional Transport Plan (Consultative Draft), Review of Energy Policy in Wales, Energy	Newport Unitary Development Plan, Air Quality Action Plan	Policies should promote energy efficiency in new developments and the creation of energy from renewable sources	Population, Air, Climate Factors	<b>10, 11</b>



Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
	Impact Assessment, Renewable Energy Coalition	Saving Wales – Energy Efficiency Action Plan, MIPPS 01/2005 Planning for Renewable Energy, DTI Energy White Paper, Starting to Live Differently				
<b>Safeguard non renewable resources and use all resources wisely</b>	European Sustainable Development Strategy, Kyoto protocol on climate change, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, Renewable Energy Coalition	UK Sustainable Development Strategy – Securing the future, WSP, PPW, South East Wales Regional Waste Plan, Minerals Planning Policy Wales, MTAN1; Wales Spatial Plan, Building a Future for Wales – A sustainable housing strategy, Energy Saving Wales – Energy Efficiency Action Plan, MIPPS 01/2005 Planning for Renewable Energy, Starting to Live Differently	Newport Unitary Development Plan,	Policies should safeguard minerals and other non renewable resources	Population, Material Assets	1, 3, 11, 12, 13
<b>To conserve soil resources and maintain their quality</b>	European Sustainable Development Strategy, EU 6TH Environmental Action Plan, EU Soil Framework Directive, European Nitrates Directive, EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment, Environmental	Environment Strategy for Wales, Wales Spatial Plan, Starting to Live Differently	Newport Unitary Development Plan, Contaminated Land Strategy; Nature Conservation Strategy (Draft SPG), Local Biodiversity Action Plan	Policies should ensure soil resources are not adversely affected by development	Soil, Landscape, Water	3



Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
	Liability Directive					
<b>Promote good design in all new development to contribute to a higher quality built and natural environment</b>	European Sustainable Development Strategy,	PPW, TAN12 – Design, TAN 10-Tree Preservation Orders, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, MIPPS 01/2008 Planning for Good Design	Newport Unitary Development Plan, Residential Design Guide Supplementary Planning Guidance, Newport Public Realm Strategy - Draft Supplementary Planning Guidance	Policies should ensure good design which respects the local vernacular and complements the area in which they are located	Population, Landscape, Cultural Heritage	<b>13</b>
<b>Social</b>						
<b>Protect and enhance the valued historic environment and its setting</b>		PPW, Cultural tourism strategy for Wales, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan	Newport Unitary Development Plan, A Masterplan for Central Newport	Policies should protect and enhance valued historic environment and its settings	Cultural Heritage, Landscape	<b>19, 20</b>
<b>Improve accessibility and transport links to key services from residential areas through improved</b>		TAN18 - Transport, PPW, The Transport Framework for Wales; Wales Spatial Plan, White Paper on Sport, Sport Playing Its Part, Regional Transport Plan	Newport Unitary Development Plan, Draft Rights of Way Improvement Plan, Accessibility Design Guide -	Policies should ensure developments and key services are	Population; Human Health; Air	<b>14, 15, 16, 25, 26</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
<b>travel choices to reduce social inequality</b>		(Consultative Draft),, One Wales: Connecting the Nation – The Wales Transport Strategy, PPW	Supplementary Planning Guidance	served by a range of transport options to improve accessibility		
<b>Improve the health and wellbeing of the population through reducing inequalities in health and improving accessibility to health services</b>	European Sustainable Development Strategy, EU 6th Environmental Action Plan, Agenda 21	Wales Spatial Plan, Well Being In Wales, Building a Future for Wales – A sustainable housing strategy, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, White Paper on Sport, Sport Playing Its Part, Regional Transport Plan (Consultative Draft), Starting to Live Differently, NHS – Exercise referral Systems: A National Quality Assurance Framework	Newport Unitary Development Plan, Draft Rights of Way Improvement Plan; Community Strategy; Children and Young People's Plan, 'Leading a Fulfilled and Healthy Life': A Health, Social Care and Wellbeing Strategy for Newport, A Masterplan for Central Newport	Policies should promote healthy and active lifestyles and allow access to recreation opportunities. Health facilities should be located to maximise accessibility	Population, Human Health	<b>15, 16, 26</b>
<b>Raise educational attainment to help improve opportunities for life</b>	Aarhus Convention, PSI Directive	South East Wales Economic Development Strategy; Wales Spatial Plan, Achieving Our Potential, Monmouthshire UDP, Caerphilly County Borough (Council	Newport Unitary Development Plan, Community Strategy; Children and Young	Policies should ensure the opportunity to access educational	Population, Human Health	<b>24</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
		Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, White Paper on Sport, Sport Playing Its Part, Starting to Live Differently	People's Plan, Waste Management Strategy, A Masterplan for Central Newport 2006	facilities is available to all		
<b>Raise skill levels to enable individuals to equip themselves with the necessary skills to find and remain in work.</b>		A Winning Wales – The National Economic Development Strategy of the WAG; Wales a Better Country; Wales Spatial Plan, Draft Economic Development Strategy, Starting to Live Differently	Newport Unitary Development Plan, Community Strategy; Children and Young People's Plan, A Masterplan for Central Newport	Policies to enable training and educational facilities are located so as to maximise accessibility	Population	<b>21, 22, 24</b>
<b>Improve the quality, variety and affordability of housing to ensure that everyone has the opportunity to live in a decent affordable home</b>		TAN1- Joint Housing Land Availability Studies, TAN2 – Planning and Affordable Housing, Wales Spatial Plan; National Housing Strategy – Better Homes for People in Wales; PPW, Building a Future for Wales – A sustainable housing strategy, MIPPS 01/2006 Housing, Housing Needs Survey	Newport Unitary Development Plan, Community Strategy, Local Housing Strategy, Affordable Housing Draft Supplementary Planning Guidance, Joint Housing Availability Study for Newport	Policies should ensure that housing of a range of types and tenures is provided	Population, Human Health,	<b>17</b>
<b>Reduce levels of crime and fear of</b>		TAN 12- Design, Monmouthshire	Newport Unitary	Policies should promote safe	Population,	<b>18</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
<b>crime and promote safer neighbourhoods</b>		UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Sport Playing Its Part	Development Plan, Community Strategy; Children and Young People's Plan, Local Housing Strategy; Community Safety Partnership Plan	and sustainable communities	Human Health	
<b>Reduce poverty and social exclusion and improve equality of opportunities amongst all social groups</b>	European Sustainable Development Strategy, Johannesburg Declaration on Sustainable Development, Agenda 21, Rio Declaration on Environment and Development, Aarhus Convention, PSI Directive	Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, White Paper on Sport, Sport Playing Its Part, Regional Transport Plan (Consultative Draft), Starting to Live Differently, A Fuel Poverty Commitment to Wales	Newport Unitary Development Plan, Community Strategy; Children and Young People's Plan, Local Housing Strategy	Policies should promote safe and sustainable communities and allow people to access employment and other opportunities	Population, Human Health	<b>14</b>
<b>Create sustainable and balanced communities</b>	Johannesburg Declaration on Sustainable Development, European Spatial Development Perspective, European Sustainable	TAN20 – The Welsh Language – UDPs and Planning Control, Achieving Our Potential, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Sport	Newport Unitary Development Plan, Community Strategy; Children and Young People's Plan, Local Housing Strategy, A Masterplan for Central Newport	Polices should provide for a range of housing, employment and other opportunities to enable people to realise their	Population, Human Health	<b>14, 15, 16, 20, 21, 24, 25, 26, 27</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
	Development Strategy, Agenda 21, Rio Declaration on Environment and Development, EU Rural Development Policy, Aarhus Convention, PSI Directive	Playing Its Part, Regional Transport Plan (Consultative Draft), PPW, Farming for the Future, Starting to Live Differently		individual aspirations		
<b>Protect and provide local social, recreational and leisure facilities</b>		TAN 16 – Sport and Recreation, Climbing Higher, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, White Paper on Sport, Sport Playing Its Part, The Six Acre Standard – Minimum Standards for Outdoor Playing Space, Climbing Higher – The WAG Strategy for Sports and Physical Activity, WAG Play Policy	Newport Unitary Development Plan, Draft Rights of Way Improvement Plan; Community Strategy; Children and Young People's Plan, Assessment of open space provision, Supplementary Planning Guidance Outdoor Play Space Provision, A Masterplan for Central Newport	Policies to provide for a range of social, recreational and leisure facilities to meet local need	Population, Human Health	<b>15, 16, 26</b>
<b>Economic</b>						
<b>Ensure high and</b>	Johannesburg	Winning Wales, The National	Newport Unitary	Policies should	Population	<b>21</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
<b>stable levels of local employment</b>	Declaration on Sustainable Development, The European Employment Strategy, European Sustainable Development Strategy, Rio Declaration on Environment and Development,	Economic Strategy of WAG, Five counties Regeneration Framework, South East Wales Economic Development Strategy, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, Sport Playing Its Part, Draft Economic Development Strategy, Starting to Live Differently	Development Plan, South East Wales Development Strategy, Waste Management Strategy	ensure adequate provision of local employment opportunities		
<b>Promote Economic growth and business competitiveness across the County Borough, focusing on inward investment, supporting viable new business start ups and ensuring a supply of local employment sites.</b>	European Spatial Development Perspective, The European Employment Strategy, European Common Agricultural Policy	A Winning Wales, The National Economic Strategy of WAG, South East Wales Economic Development strategy, Wales Spatial Plan; South East Wales Development Strategy, PPW, Heads We win – A strategic Framework for the heads of the valleys, Five Counties Regeneration Framework, Achieving Our Potential, Draft Economic Development Strategy, Farming for the Future, PPW	Newport Unitary Development Plan, South East Wales Development Strategy, A Masterplan for Central Newport	Policies should ensure a range of employment sites and premises to meet business needs	Population	<b>22</b>
<b>To promote/develop a knowledge based economy</b>	European Spatial Development Perspective	A Winning Wales, South East Wales Economic Development strategy; Five counties	A Masterplan for Central Newport	Policies should ensure supporting	Population	<b>21, 22, 24</b>

Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
		Regeneration Framework; Wales a better country		educational and ICT infrastructure		
<b>Establish a strong tourist economy, sensitively capitalising on environmental, heritage, and leisure assets</b>		PPW, TAN13 – Tourism, Sports Tourism in Wales, Cultural Tourism Strategy for Wales; Wales Spatial Plan, Revised Tourism Strategy for South East Wales, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, White Paper on Sport, Sport Playing Its Part, Regional Transport Plan (Consultative Draft), National Tourism Strategy for Wales	Newport Unitary Development Plan, Draft Newport Tourism Strategy, A Masterplan for Central Newport	Policies should promote the use and enhancement of landscape, cultural and historic resources for tourism development	Population, Cultural Heritage, Landscape, Material Assets, Biodiversity	<b>23, 24</b>
<b>Improve the vitality and viability of towns and neighbourhood centres</b>	European Sustainable Development Strategy,	PPW, TAN4 – Retailing and Town Centres, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, White Paper on Sport, Sport Playing Its Part, Regional Transport Plan (Consultative Draft), MIPPS	Newport Unitary Development Plan, A Masterplan for Central Newport	Policies should enhance the accessibility and role and function of centres, which should be the focus for community life	Population, Material Assets	<b>13, 14, 27</b>



Themes relevant to SA/SEA of Newport LDP	Source				Main SEA topics	Relationship to final SA objectives
	European	National/Regional	Local	Implications For The LDP		
		02/2005 Planning for Retailing and Town Centres				
<b>Promote the regeneration of disadvantaged wards and support the revitalisation of such areas</b>	EU Objective 1,2 and 3 Programmes, EU Rural Development Strategy	PPW, The Wales Spatial Plan, UK Sustainable Development Strategy Wales a better country, Communities First Programme, Monmouthshire UDP, Caerphilly County Borough (Council Approved) UDP, Blaenau Gwent Unitary Development Plan Proposed Modifications, Torfaen Local Plan, City of Cardiff Local Plan, South Glamorgan Replacement Structure Plan, White Paper on Sport, Sport Playing Its Part, Regional Transport Plan (Consultative Draft), Starting to Live Differently		Policies should promote safe, sustainable communities with access to a range of essential services	Population; Human Health	<b>13, 14, 25, 26</b>



## 4. The Environmental, Social, Economic and general baseline characteristics for Newport

### 4.1 Task A2

The next task in SA covers the collation of baseline information. The review of other plans and programmes undertaken previously has also provided a considerable amount of baseline information and this has been complemented by collation of data on key indicators relating to the SEA topic areas, as well as additional social and economic indicators for the plan area.

More specifically, the SEA Directive states that the Environmental Report should provide information on:

*“relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan” and the “environmental characteristics of the areas likely to be significantly affected” (Annex I (b) (c))*

and

*“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Birds Directive) and 92/43/EEC (Habitats Directive)” (Annex I (c) ).*

### 4.2 General Characteristics of the County Borough of Newport

Standing at the gateway to Wales, Newport covers a geographical area of just over 73.5 square miles and is a vibrant, forward-thinking city. Steeped in history, it contains in Caerleon one of the three Roman military fortresses in Britain. Newport also has a rich industrial heritage, dating mainly from the nineteenth century, when its important strategic location led to its rapid development.

After losing some of its historic core industries, the city is successfully proving that it can re-establish and adapt itself as a centre of modern industry and commerce, with electronics and financial service businesses now standing alongside traditional industries. Redevelopments are taking place in the city centre; and many regeneration projects are transforming the waterfront and other parts of the city.

The analysis of the baseline data has highlighted a number of key sustainability issues in Newport. These, together with implications and opportunities arising for the LDP, have been summarised in Table 5.1 and form part of Task A3 of the SA/SEA process.

### 4.3 Methodology

Information describing the baseline provides the basis for the prediction and monitoring of the effects of the implementation of the LDP and its constituent documents. It can be used as a way of identifying problems as they occur and policy changes may be made.

Due to the fact that SA is an iterative process, subsequent stages in its preparation and assessment might identify other issues and priorities that require the sourcing of additional data and/or information and identification of monitoring strategies. This makes the SA process flexible,

adaptable and responsive to changes in the baseline conditions and enables trends to be analysed over time.

The most efficient way to collate relevant baseline data is through the use of indicators (see below). This ensures that the data collation carried out is both focused and effective. The identification of relevant indicators has taken place alongside the assessment of other relevant plans policies and programmes (Task A1), the identification of sustainability issues (Task A3), and developing the sustainability appraisal framework (Task A4).

It should be noted that the SA process does not require the collection of primary data, but relies of the analysis of existing information. As such, where data gaps exist, this is highlighted in the report.

Sustainability indicators have been selected for their ability to provide objective data that will, over time, offer an insight into general trends taking place. Throughout the assessment process, the following issues will need to be addressed:

- What is the current situation, including trends over time?
- How far is the current situation from known thresholds, objectives or targets?
- Are particularly sensitive or important elements of the environment, economy or society affected?
- Are the problems of a large or small scale, reversible or irreversible, permanent or temporary, direct or indirect?
- How difficult would it be to prevent, reduce or compensate for any negative effect?
- Have there been, or will there be, any significant cumulative or synergistic effects over time?

## 4.4 Data Analysis

The baseline data provides an overview of the environmental, social and economic characteristics of the LDP area and how these compare to the region, the rest of the Principality and the UK. This overview is presented in Appendix A. Data have been collated and analysed for the following indicators:

### Environmental Data

- Important Species: Coastal Levels; Riverine Habitats; Neutral Grasslands; and Marshy Grasslands
- UKBAP and LBAP Habitat Types
- Sites of Special Scientific Interest (SSSIs)
- Sites of Importance for Nature Conservation (SINCs)
- National Nature Reserves
- Local Nature Reserves
- Non Statutory Nature Reserves (locally designated)
- Key Reedbed Sites
- Air Quality
- Landscape Designations
- Landscape Character Areas
- Ancient Woodland

- Geological succession of the Newport area
- Contaminated Land
- Waste
- Commons
- Public Rights of Way (PROW) in Newport, including classification of PROW in Newport considered 'easy to use' compared to all authorities in Wales
- Cycle Routes
- Landscape Character Areas
- Public Water Supply
- Groundwater Source Protection Zones
- Flood Risk
- TAN 15 Flood Risk
- Carbon Footprint
- Predicted Climate Change
- Local and regional estimates for carbon emissions
- SAP ratings
- Air quality objectives
- Historic Landscape
- Scheduled Ancient Monuments
- Listed Buildings
- Conservation Areas
- Registered Parks and Gardens
- Land Use

#### **Social Data**

- Settlement Pattern
- Population: total and age structure
- Early years education and childcare
- Education: Future Capacity of Schools
- Physical Inactivity and Activity Rates
- Diversity and ethnicity
- Welsh speaking population
- Deprivation
- Unemployment
- Benefits claimants
- Open Space provision by ward
- Housing tenure including breakdown by ethnicity

- Average property prices
- Household type distribution
- Limiting long term illness
- Persons providing unpaid care
- Household amenities
- Unsuitability of housing by cause
- Private sector stock by sub-area

#### **Economic Data**

- Economically active population, disaggregated by type of employment
- Economically inactive population
- Average hours worked per week
- Origins of Newport workforce
- Travel to work by mode
- Availability of the car
- Employment by sector
- Occupations by type
- JSA Claimants
- Qualifications
- Attendance at education establishments
- VAT registrations and deregistrations, and % by stock
- Retail forecasts

## **4.5 Data Limitations**

The purpose and use of indicators is to provide quantified, objective information in order to show how things change over time. However, they do not explain why particular trends are occurring and the secondary, or knock-on, effects of any changes.

There are several gaps in the data collected as a result of not all the relevant information being available at the local level for recent time periods but it is believed that the data sets available provide a comprehensive overview of the sustainability situation in Newport. Data gaps include:

- Local level data on Agricultural Land Classification
- LANDMAP data (not readily available to the public at present, an issue being investigated by CCW and to be included when the data becomes available)
- Noise tranquillity mapping (data currently being collated by Council)
- Accessible natural greenspace provision (data currently being collated by Council)
- Historic Landscape Characterisation

## 5. Identifying Key Sustainability Issues

### 5.1 Task A3

The next task in the SA is the identification of sustainability issues. The identification of sustainability issues of particular significance in Newport provides an opportunity to define key issues for the LDP and to influence the plan objectives and options. The analysis of sustainability issues is reflected in the baseline and the development of the SA framework, in particular in identifying and selecting indicators and targets.

This section describes the current situation and highlights the key issues faced within Newport. It does not attempt to cover all the issues, but identifies those that are considered to be a priority in terms of the sustainability of the Council area.

#### SEA Directive

The requirement to identify sustainability problems and issues arises from the SEA Directive, where the Environmental Report required under the Directive should include:

*“Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC” (Annex I(d))*

### 5.2 Methodology

The key sustainability issues for Newport have been derived by analysing the baseline data and contextual information from PPPs; and assessing what the likely significant issues will be over the longer term i.e. 10 years +.

The analysis of sustainability issues has been iterative and is ongoing. As the SA develops with further stakeholder involvement, the analysis of key issues is likely to evolve.

It should be noted that some of the sustainability issues identified are not necessarily under the LDP's direct field of influence, for example population growth. However, it is considered important to reflect these where there may be indirect causality that can potentially be shaped by planning policies through the LDP.

### 5.3 Results

Table 5.1 presents the results of the analysis of key sustainability issues.

Table 5.1 – Key Sustainability Issues and Opportunities

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<b>Environmental</b>			
<b>Poor Air Quality</b> <p>There are a large number of AQMAs in Newport, which were declared because assessments of air quality predicted that the annual mean objective for nitrogen dioxide (NO<sub>2</sub>) was not likely to be met by the target date of December 2005. The primary source of NO<sub>2</sub> in these areas was from traffic emissions, and particularly from the M4 motorway and its immediate arteries. Poor air quality can have negative implications for human health, climate change and the natural and built environment.</p>	<p>Improving air quality should be considered as an integrated requirement in all new development. This may be done through reducing the need to travel and encouraging more sustainable modes of transport. Additionally, an increase in vegetation may provide carbon sinks.</p> <p>The impact of the proposed M4 relief road should also be considered as part of the future implications on air quality.</p>	Air, Climatic Factors, Human Health	4
<b>Local Food Production</b> <p>Organic farming can have a considerable impact on the biodiversity of the area by improving and managing valuable habitats for wildlife.</p> <p>Fruit and vegetables bought direct from the producer tend to be fresher and have been shown to contain higher levels of vitamins. The increased awareness of local food and interest in purchasing it will have health benefits and also contribute to a sense of local distinctiveness and pride amongst local communities in their local environments.</p> <p>Purchasing local produce strengthens the local economy by keeping money spent locally, offers more diverse employment, helps farmers</p>	<p>There is an important link between food production and landscape character. It is important to identify what habitats are linked to local food production e.g. orchards. This information should then be used to inform strategies and approaches to conserve valued habitats and landscapes.</p> <p>Awareness of the link between landscape and food production and the local produce itself needs to be actively promoted to urban populations. All avenues for promotion need to be explored e.g., healthy living initiatives such as</p>		

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
add value and increase revenue. There are also environmental benefits by reducing “food miles” and associated pollution, and reduction in packaging and waste of valuable resources.	“walk to health” events could visit local producers on route.		
<b>CO2 emissions</b> Newport City Council's Per capita emissions of CO2 were 12.5 tonnes in 2005, which was high compared with the Welsh average of 9.0 tonnes. This will have implications for climate change and human health.	The LDP should seek to reduce greenhouse gas emissions through a variety of measures such as improved housing stock, reducing the need to travel and improved travel choices.	Air, Climatic Factors, Human Health	5
<b>Energy Efficiency</b> In Newport 3.9% of houses have a SAP rating of less than 30. 8.2% of households suffer from fuel poverty. A key issue in reducing energy consumption is tackling fuel poverty. The occupiers of a dwelling are considered to be in fuel poverty if more than 10% of their net household income would need to be spent on heating and hot water to give an adequate provision of warmth and hot water. The lack of ability to pay to improve the energy efficiency of dwellings by some families may only exacerbate this problem.	The LDP should integrate current Energy Efficiency Programmes into policy considerations. The LDP should seek to ensure that all new development meets high energy efficiency standards in order to reduce fuel poverty, reduce greenhouse gas emissions, and improve human health.	Human Health, Climatic Factors, Population	3,5
<b>Landscape</b> The countryside is essentially a working environment for those employed in agriculture and forestry, as well as being home to	Areas protected for their landscape value and their settings should be preserved and, wherever possible, enhanced.	Landscape, Human Health,	1,3,13



Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>commuter communities. At the same time, the countryside in Newport represents a considerable resource for access, recreation and wildlife; therefore it is essential to strike a balance between the different uses, and users of the countryside.</p> <p>Although a primarily rural landscape, it has been subject to intensive agricultural use and, adjacent to the urban areas, continues to be subject to development pressures. Consequently, areas of nature conservation value tend to be fragmented and scattered and have limited impact upon the landscape character of the area. More details relating to threats affecting these key landscape areas are outlined in Appendix A</p> <p>Landscape Character Areas Identified (1999) are:</p> <ul style="list-style-type: none"> <li>• Wentlooge Levels</li> <li>• Caldicot Level</li> <li>• Bishton-Llanwern</li> <li>• Usk Valley</li> <li>• Christchurch: Kemeys Graig Ridge</li> <li>• Llanvaches</li> <li>• Llandevad-Penhaw</li> <li>• Allt-yr-yn Coed Mawr</li> <li>• Western Rural Newport</li> </ul>	<p>Areas designated as SPAs, SACs and Ramsar Sites should be protected from any adverse effects arising from development in accordance with the aims of the Habitats Directive.</p> <p>Policies should seek to safeguard the integrity of recognised historic landscapes recognised for the interaction between existing features.</p>	Flora and Fauna	

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<ul style="list-style-type: none"> <li>Northern Rural Newport</li> <li>Tredeggar Park .</li> </ul>			
<p><b>Water Quality</b></p> <p>River Usk (SAC): Water quality is good throughout the main river, except for localised enrichment from sewage discharges, the effects of which, along with the more significant water abstractions, may harm water quality.</p> <p>The SPZ provides an indication of the risk to groundwater supplies, for which SPZ have been defined, which may result from potentially polluting activities and accidental releases of pollutants. The local aquifers, as outlined in the baseline description, will seldom produce large quantities of water for abstraction, but are important both for local supplies and for base flow of the regions rivers.</p>	<p>The LDP should ensure that new development seeks to enhance the quality of surface and ground waters, and mitigate any potential effects.</p> <p>For aquatic ecosystems such as streams and rivers, the continuity of open channel, its structure and associated corridor habitat, is as important as basic water quality/quantity (e.g. otters, water vole, native crayfish etc). Additionally, the channel structure is important in terms of the flooding and the floodplain.</p>	Water, Biodiversity Flora and Fauna	2, 3, 7, 8, 9
<p><b>Flood Risk and Water Quality</b></p> <p>Risks of and from flooding will be exacerbated by the effects of climate change as well as additional surface water run-off from development. Increased surface water run off can also put pressure on sewerage infrastructure, which may lead to contamination of water resources from drainage overflow events.</p>	<p>Policy should be required to ensure that criteria are established for the location of development in areas that avoid flood risk and management any residual risks.</p> <p>New development needs to take account of flooding from all sources (inc hard standing)</p> <p>New development should seek to minimise net increase in surface water run off to minimise potential pollution to water resources.</p> <p>Sustainable Urban Drainage Systems can be</p>	Water, Human Health, Material Assets	6

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
	<p>combined with the need to enhance biodiversity as well as improve amenity, energy efficiency and carbon sink capacity, through the use of green infrastructure including features such as green roofs.</p> <p>Measures to enable developments to adapt to and mitigate the potential future impacts of climate change should be ensured.</p>		
<p><b>Commons</b></p> <p>The habitats represented on common lands are very varied, but include some important areas of semi-improved grassland, marshy grasslands, bracken and heathland. Most of the Levels commons are included within the Gwent Levels SSSIs, whilst others elsewhere are being considered as SINCs. The habitats of the larger commons were surveyed and documented in 1994, however, there remains no general consensus as to how these areas should be managed or regulated.</p>	<p>Some of the commons are owned by NCC whilst others are owned by private estates and/or individuals. Therefore the LDP should ensure that protection is afforded to the commons in order that their biodiversity value is not compromised.</p>	Biodiversity, Material Assets	2
<p><b>Biodiversity</b></p> <p><b><u>Threats to designated habitats and species</u></b></p> <p>Two sites associated with Newport have European designations as Special Protection Areas (SPAs) and Ramsar sites to conserve habitats of listed rare or vulnerable birds and regular migratory species, and / or as Special Areas of Conservation (SACs / cSACs) to conserve habitats and listed rare or vulnerable species. All types of development have the potential to negatively affect designated sites</p>	<p>The acknowledgement of the significant value of the natural environment in Newport is important to ensure that these valuable habitats remain protected.</p> <p>It is necessary, in order to achieve an integrated approach to sustainable development, that any proposed development must be categorically</p>	Biodiversity, Flora and Fauna	2

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>and species.</p> <p><b>The River Usk SAC:</b> Many rare, threatened and declining species and habitats are associated with the river, including:</p> <p><b>Habitats:</b></p> <p>Water courses of plain to montane levels with the Ranunculus fluitantis and Callitriche-Batrachion vegetation</p> <p><b>Species:</b></p> <ul style="list-style-type: none"> <li>• Salmon</li> <li>• Sea trout</li> <li>• Sea lamprey</li> <li>• Brook lamprey</li> <li>• River lamprey</li> <li>• Allis shad</li> <li>• Twaite shad</li> <li>• Bullhead</li> <li>• Otter</li> </ul> <p><b>Severn Estuary RAMSAR, cSAC AND SPA:</b> The estuary is internationally important for the following habitats and species:</p> <p><b>Habitats:</b></p> <ul style="list-style-type: none"> <li>• Sandbanks which are slightly covered by sea water all the time</li> </ul>	<p>proven to not have a likely significant effect on the integrity of designated sites, in order that the environmental, social and economic goals can be achieved concurrently.</p> <p>Development that may have a significant negative effect on habitats and species, whether protected or not, should seek to mitigate these effects, creating a net result of overall enhancement to wider biodiversity. This will enable economic and social aims to be achieved alongside the protection and enhancement of the natural environment.</p> <p>The need to retain and enhance connectivity between habitats as part of overall biodiversity is important, especially as climate change may mean species adapting to different habitats, creating short or long distance migration. Green infrastructure created holistically across the plan area, enabling linkages between large habitats and within urban areas, can help to improve biodiversity, as well as reduce flood risk, improve carbon sink capacity, and have amenity value.</p>		

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<ul style="list-style-type: none"> <li>• Estuaries</li> <li>• Mudflats and sandflats not covered by seawater at low tide</li> <li>• Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)</li> </ul> <p><b>Species:</b></p> <ul style="list-style-type: none"> <li>• Salmon</li> <li>• Sea trout</li> <li>• Sea lamprey</li> <li>• River lamprey</li> <li>• Allis shad</li> <li>• Twaite shad</li> <li>• Eel</li> <li>• Tundra swan</li> <li>• Greater white-fronted goose</li> <li>• Common shelduck</li> <li>• Gadwall</li> <li>• Dunlin</li> <li>• Common redshank</li> <li>• Bewick's Swan (SPA)</li> </ul> <p><b>Nationally Designated Sites</b></p> <p>These sites comprise SSSIs and NNRs designated under the Wildlife &amp; Countryside Act 1981. They are afforded the highest level of statutory protection against potential damage and harm. The city</p>			

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>contains 11 SSSIs, either wholly or in part</p> <p><b><u>Threats to non-designated habitats and species</u></b></p> <p>While it may not be a priority to protect certain habitats and species, these also require protection. Potential threats to non-designated habitats and species are outlined in Appendix A. In summary:</p> <ul style="list-style-type: none"> <li>• There are various important, declining, and scarce species within the River Usk, The Severn Estuary, Coastal Saltmarsh habitats, Upland Mixed Ash Woodland, Wet Woodland, Riverine Habitats, Mudflats, Reedbeds, Neutral Grasslands, Coastal and Floodplain Grazing Marsh, and gardens.</li> <li>• Threats to these habitats include:             <ul style="list-style-type: none"> <li>- Land claim for agriculture and industry.</li> <li>- Continuous threat of all development such as airport, barrage etc.</li> <li>- Introduction of non-native species.</li> <li>- Lack of appropriate management</li> <li>- Pollution including nutrient enrichment and heavy metals.</li> <li>- Climatic change and atmospheric pollution.</li> <li>- Urbanisation and development in catchments</li> </ul> </li> <li>• Domestic pets (particularly cats) can be a real threat to birds</li> </ul>			

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
and small animals			
<p><b>Contaminated Land</b></p> <p>Newport was awarded the honour of City Status in 2002. This status is increasingly signalling an increase in inward investment, thus putting further developmental pressure on many of Newport's brownfield sites. This may mean that more sites with known areas of contamination will be addressed through development control processes.</p> <p>The banks of the River Usk have a long history of industrial development. The presence of heavy industries, particularly during years of little environmental concern, has led to large areas of made-ground containing a variety of elevated concentrations of metals and hydrocarbons. Site investigations for locations allocated for development have indicated this contamination, yet despite concentrations being elevated, current information does not suggest that they warrant remedial action under Part IIA of the EPA. However, this contamination will be addressed through any proposed development of the site.</p> <p>There are several sites within the City that have been contaminated in the past, but have since had the contamination addressed and are now remediated to a standard that is suitable for use. Of particular note is the housing and education land at the former Rogerstone Power Station site. Prior to development, this land was unsuitable for use due to the presence of asbestos within the pulverised fuel ash (PFA), which covered much of the site.</p>	The LDP should seek to encourage the remediation of contaminated land, for its use as developable land.	Soil	3



Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<b>Waste</b> <p>There is potential to further improve recycling rates. Findings of a recent major public survey carried out by the Environment Agency show that most people in Wales are happy to separate out the recyclable and compostable components of household rubbish provided the facilities to collect the materials are made widely available.</p>	<p>Facilities are already in place in Newport therefore availability of and access to and use of existing community recycling/composting initiatives needs to be raised, in order to influence people's behaviour.</p>	<p>Human Health, Soil, Material Assets</p>	<p>12</p>
<b>Social</b>			
<b>Crime and Fear of Crime</b> <p>Concern about crime and disorder is the most pressing issue for Newport according to the Community Strategy.</p> <p>Some groups, particularly families and older people, tend to avoid some areas like the city centre at night.</p> <p>Locally there is a concern that proactive approaches to dealing with city centre disorder has resulted in Newport being branded a particularly violent place, which is not borne out by crime figures.</p> <p>There are a number of alcohol exclusion zones in existence and proposed around the City. These could be promoted as safety zones together with key public transport corridors, as areas prioritised for action (CCTV, improved surveillance and lighting etc.)</p> <p>Newport does experience areas of higher crime, often corresponding with wider deprivation.</p>	<p>The LDP should take into regard the aims of the community strategy, and ensure that they are integrated into the development of the plan at all stages. The LDP policies should seek to enhance a sense of community, wherever this is possible, through the design of new developments to increase surveillance and a sense of well-being; and the provision of facilities for community usage.</p>	<p>Population, Human Health, Material Assets</p>	<p>16,18</p>
<b>Access</b> <p>NCC continues to provide many public transport routes that fill in the</p>	<p>The LDP should ensure that development is designed to minimise the need to travel to access</p>	<p>Human Health</p>	<p>16</p>

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
gaps left by the local bus operators and these have seen a 5% increase in patronage during the last 12 months. NCC continues to support community transport and now has over 500 members of their NewLink scheme giving access to all parts of Newport for less mobile members of the community. Efforts are being made to improve both public and community transport by increasing their availability and looking at alternative and innovative ways in which they can operate.	key services and facilities. This will ensure that access for all sections of the community is maximised.		
<b>Cultural Heritage and Historic Environment</b>  The county borough has a wealth of buildings, areas and ecological/landscape features that are protected for their historical, cultural, architectural or archaeological interest (see Appendix A).  The Chartist Movement was also prominent in Newport's historical development.  There is an opportunity for supporting much greater use of the historic environment as a catalyst/theme/driver for development. This will help to halt the decline of many historic buildings (grand and background in character) into dilapidation through pro-active encouragement of re-use.	New development should seek to enhance the setting of sites and buildings that are protected for their heritage value as well as enhance the natural historic environment and landscape, including trees and woodlands.  Policies should seek to integrate historical features and awareness into the realisation of new development.	Cultural Heritage	19
<b>Health</b>  There was a large increase of people with a limiting long term illness between 1991 and 2001.  In Newport over half of people over 65 report that they had this type of limiting long term illness (2001). The interplay of different conditions, and the medications required to treat these, makes the care of older	Access to health facilities for all sectors of the population should be a key consideration for the LDP.  Policies should seek to create environmental that encourage more active lifestyles.	Human Health	14,15

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>people extremely complex. Older people as a group tend to have a lower income than the general population when the incidence of limiting long term illness tends to increase with age. Of all the older people living in Newport, 15% live alone, potentially creating an additional level of demand on services.</p> <p>Newport has many specific significant health problems, which are worse than the Welsh average and which need addressing as a matter of urgency. In addition there are considerable differences in health status between the richer and poorer areas.</p>			
<p><b>Physical Activity</b></p> <p>Judged against NPFA standards, in the majority of wards there is a shortfall in provision of accessible open space. Access to open space can have benefits that are both mental and physical. Areas of deficiency may therefore experience a population that does not participate in informal physical activity, alongside other effects associated with environmental inequality.</p>	The LDP should ensure that there is a sufficient and equitable distribution of open space throughout the plan area.	Human Health	14,15,16
<p><b>Cycling</b></p> <p>The proposed Sustrans 2 network will provide an opportunity to improve sustainable access to the countryside for the residents of Newport.</p> <p>Newport City Council is also about to commence cycle hire schemes to encourage families and beginners to take up cycling as an active pastime, which provides an opportunity to improve health and wellbeing for all sections of the community.</p>	The LDP should take into account the proposals for an improved cycle network, ensuring integration of new proposals with this facility is maximised.	Human Health	16

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
The active lifestyles initiative will encourage greater participation of cycling and walking across the City: again necessitating local, suitable cycle trails, which are linked between areas, creating a suitable network for more active participants.			
<b>Poor health in Children and Young People</b> Babies born in Newport suffer from high rates of Infant Mortality, as well as low birth weights. There is also a high rate of teenage pregnancies. These may indicate a high level of deprivation within the county borough, which is an issue for the LDP.	Access to health facilities and health education for all sectors of the population should be a key consideration for the LDP, as part of an aim to reduce deprivation and inequalities across wards.	Human Health, Population	15
<b>Gypsies and travellers</b> There is currently no permanent gypsy and traveller site in Newport, save for a small single family site in the west of the city. This means that the gypsies and travellers in Newport are either living in unauthorised encampments or in bricks and mortar accommodation. It has been suggested by the local police force that up to nine families have strong cultural and social associations with the City.	The LDP should address the accommodation and related needs of gypsies and travellers in Newport.	Human Health, Population	14, 17
<b>Households and Housing</b> The 1996 population level for Newport was 136,800 and it is likely to group to about 139,100 by 2011. Due to social and demographic factors, the average household size is likely to decrease. Latest available statistics show this as being 2.31 (2004). It is anticipated that the growth in households is likely to be greater than the population growth rate. The amount of housing stock in 1996 was 56,500. The adopted UDP cites that between 2001 and 2011, 5,700 dwellings will	The LDP should seek to improve the quality, type and tenure of housing, and ensure that high quality housing is affordable to all sections of the community.  The LDP should seek to ensure that there is sufficient land allocated for housing in accessible locations, taking into account the need to reduce car based travel.	Human Health, Population	14, 17

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>be required.</p> <p>Threats identified in the 2007 Local Housing Strategy were:</p> <ul style="list-style-type: none"> <li>• Stock transfer</li> <li>• Environmental impact</li> <li>• Low demand</li> <li>• Right to Buy</li> <li>• Decline of traditional industry</li> <li>• Social exclusion</li> <li>• Ageing sewerage system.</li> <li>• Budgets</li> </ul> <p>Threat of Stock Transfer: it is noted that by the time the LDP is adopted, all stock will have been transferred so some of these issues will be replaced with others (demolition/management of RSLs/quality control on accommodation etc.) However, in line with national trends, the size of the Council housing stock has been steadily declining for a number of years due to a number of tenants exercising the Right to Buy. The City Council has also embarked on a rationalisation of its unpopular housing stock. As a result there are a large number of applicants on the housing register, which is an increasing trend.</p> <p>The figures in the baseline demonstrate that the average earner can no longer afford the average priced house in Newport. This is linked to</p>			

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>a combination of a rise in house prices, along with incomes that are considerably lower than the UK median.</p> <p>Supply of affordable housing to ensure retention of resident workforce and improved public transport from Valley communities that rely on Newport was considered a key issue by the Overview &amp; Scrutiny Forum Development &amp; Employment.</p> <p>There is a high number of people living in unsuitable housing in Newport, at 19,145 houses experiencing problems. There is a link between disability and residence in unsuitable housing.</p> <p>Homeless households in the greatest need have increased in the last three years.</p> <p>The housing requirement for the county borough is outlined in the baseline description.</p>			
<p><b>Ethnic Minorities and Housing</b></p> <p>Newport ranked as having the second largest minority ethnic population of the Welsh councils after Cardiff, with the highest proportion living in Pillgwenlly Ward.</p> <p><b>Home Ownership</b></p> <p>Pakistani, Indian and Chinese populations were more likely to own their own homes. This is consistent with the proportion of the Indian population employed in managerial roles.</p> <p><b>Overcrowding</b></p>	<p>This analysis of educational attainment, housing, educational and employment data suggests there are varying levels of disadvantage amongst BME communities and that a one size fits all solution would not be appropriate.</p> <p>The LDP should ensure that the needs of all sections of the community are addressed through its policies.</p>	Human Health, Population	14, 17

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
The local housing market assessment found that overcrowding is an issue for many Black and Minority Ethnic groups. The Local Housing Market assessment showed that over 22% of Bangladeshi households were overcrowded. This suggests that due to the comparative lack of qualifications and concentration in semi-routine and routine occupations, a significant number of Bangladeshi households are unable to meet their housing needs without assistance. Pakistani households were also shown to suffer from significant levels of overcrowding, with 17.6% of households being classed as overcrowded. Reportedly, Pakistani households would rather live in an area with an established Pakistani community. This suggests that there may be a shortage of appropriate housing in some areas.			
<b>Welsh Language and Identity</b> Compared with the figure for Wales, a low proportion of the population in the county borough are welsh speakers. This may indicate a higher level of Anglicisation than other Welsh regions, which may be contrary to Welsh Assembly objectives. Recent investment has increase the availability of facilities for the development of cultural activities including the arts, which may provide a platform for development.	The LDP may wish to provide facilities for the furthering of Welsh language, culture and identity, as part of a wider strategy to strengthen national identity.	Human Health, Population	20
<b>Economic</b>			
<b>Employment Growth</b> Newport is considered the 'gateway' to Wales and is very accessible to the main population centres of both Wales and England The unemployment rate in September 2006 was higher than both the	The LDP should seek to enhance the viability of the area as an employment centre, in order to improve employment rates. This could be done through the provision and retention of suitable sites for employment in locations that are	Population, Material Assets	21, 22



Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>Wales and UK averages. This suggests a lack of employment opportunities in Newport. Unemployment was highest in Pillgwenlly ward. There has been an increase in those who are economically active in the county borough.</p> <p>The Wales Spatial Plan Update asserts that high value developments should be a dominant feature of Newport's projected employment growth. The majority of employment is within the service sector, following a decline in the manufacturing and construction industries.</p> <p><b>Land</b></p> <p>Land, property and infrastructure availability to maintain employment growth in line with the growth forecasts set out in the UDP and to provide for business relocations arising from the regeneration of inner city areas, such as Crindau – constraints posed by flood risk, failure to release large public sector land holdings at Queensway Meadows and Celtic Lakes, loss of employment land to other uses. Also, problems caused by frequent traveller incursions onto major employment sites (especially Queensway Meadows and former LG land) raised as a significant constraint.</p> <p>Use of employment sites by other uses. Danger of housing growth running ahead of employment growth. (Overview &amp; Scrutiny Forum for Development &amp; Employment).</p> <p><b>Funding</b></p> <p>Concerns about the level of public sector funding to continue the economic regeneration programme – physical and social (including marketing) – against the background of the WAG merger, reductions in European funding available to Newport and likely constraints on Council spending. (Overview &amp; Scrutiny Forum for Development &amp;</p>	<p>accessible by sustainable means as well as being located close to residential centres. Diversification in the economy should form an integral part of this development.</p> <p>The LDP should ensure that policies mitigate for and adapt to the impacts of climate change from the perspective of enhancing economic viability alongside achieving environmental and social objectives.</p>		

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>Employment)</p> <p><b>Climate Change</b></p> <p>Concerns about the impact of climate change, rising energy costs and the green agenda – could provide both risks and opportunities for Newport businesses. (Overview &amp; Scrutiny Forum for Development &amp; Employment)</p> <p>Anecdotal evidence suggest that provision of executive housing is a barrier to inward investment as well as good schools- there is a perceived need to attract higher level workers.</p>			
<p><b>Skills</b></p> <p>Failure to properly address the skills base. Need to tackle economic inactivity across the region (but especially in disadvantaged communities) and to up skill the existing workforce. Potential to sustain and develop the Newport Construction Initiative and to develop other sector routeways including retail, customer services and self employment/community enterprise to maximise the opportunities that will be provided through the regeneration and growth of the city. (Overview &amp; Scrutiny Forum for Development &amp; Employment)</p>	<p>The LDP should seek to ensure that there is provision of an appropriate range of facilities for the improvement of skills levels in the existing workforce.</p>	Population	21,22, 24
<p><b>Travel to Work</b></p> <p>The proportion travelling in from outside Newport has increased. The numbers commuting to work in Newport were much higher than residents travelling out to work, illustrating the importance it has to the surrounding region. The majority of people in Newport drove to work</p>	<p>The LDP should seek to enhance public transport access to the County Borough in order to reduce the number of in-commuters that travel by car.</p>	Population, Human Health, Climate Change	25

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>by car or van (2001). Newport did, however, have the second highest proportion of people commuting to work by public transport in Wales.</p> <p>Public transport solutions needed for West Newport business parks. (Overview &amp; Scrutiny Forum for Development &amp; Employment)</p>			
<p><b>Deprivation</b></p> <p>Four of Newport's electoral wards feature within the list of Wales' one hundred most deprived wards and a further six sub-wards qualify for funding under the Assembly Government's Communities First programme.</p> <p>Compared to Great Britain, Newport has a high proportion of people claiming benefits (19.2% compared to 14.2% of resident working age population 2007). Benefits dependent households make up 57% of Newport's unemployed.</p>	<p>Reducing inequalities and deprivation across the Council area should be delivered through the LDP policies.</p>	Human Health	14, 21
<p><b>Education</b></p> <p><b>Capacity</b></p> <p>The LEA is facing a major issue over the next 5 years of a falling demand for primary places in its schools. Forecasts indicate that cohorts are likely to fall by 20% in a 7-8 year period and that overall, the total primary pupil numbers will decline by 1300 (10%) in the period 2003/08.</p> <p>In secondary schools, the level of surplus places is low, and there is particular pressure on provision in the Bassaleg area. Overall numbers will also begin to decline by 2005 in line with the forecast fall in primary</p>	<p>The LDP should seek to enhance the vitality and viability of communities within the plan area in order to attract increased population diversity for sustainable communities.</p> <p>The LDP should seek to ensure an appropriate level of high quality educational facilities in accessible locations to meet the needs of the community.</p>	Human Health, Population	16, 24

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>pupil numbers.</p> <p>The demand for Welsh medium education is growing in the County Borough. The current capacity of Ysgol Gymraeg Casnewydd appears sufficient at present to cater for the demand for Welsh medium education. However, the investment and support that the LEA is making in early years Welsh medium education is likely to bear fruit and it will be necessary to consider, as part of the review of primary school plans to be carried out by the LEA, the development of a second Welsh medium primary school.</p> <p><b>Poor educational performance</b></p> <p>The county experiences higher exclusion rates and lower secondary attendance than all- Wales averages.</p> <p>Newport has a higher than Welsh average proportion of people aged 16-24 with no educational, vocational or professional qualifications at 23.8%. There is significant variance in the proportion of people with no qualifications by ethnic group. More people of mixed ethnicity and those from Pakistani and Bangladeshi cultural groups between the ages of 16-24 are without qualifications whilst those from Indian and Chinese groups are less likely to be without qualifications. Individuals without qualifications are much less likely to be in well paid employment.</p>			
<p><b>Tourism</b></p> <p>Newport is undergoing an extensive transformation that will change the</p>	Build on positive tourism assets for a greater increase in tourism activity across a range of	Material Assets,	23, 27

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
<p>face of the County Borough allied to the hosting of the Ryder Cup in 2010. This provides a significant opportunity for other areas to benefit from the 'drip-down' effects of this regeneration.</p> <p>Major plans have also recently (March 08) been put forward to build a new £40 million state-of-the-art stadium on the site of Rodney Parade. The 15,000 capacity stadium will be home to Newport RFC and the Newport Gwent Dragons and will ensure the future of rugby in Newport remains in the heart of the County Borough.</p> <p>It is vital that the heritage and leisure offer of Newport is sustained and improved in order to capitalise on the continued attractiveness of the area and ensure that there is a continuing supply of jobs.</p> <p>Growth on the scale of the past few years may not be sustainable owing to, loss of major sporting events in Cardiff to the new Wembley Stadium and reduction of the business tourism profile owing to new developments in Bristol and Cardiff. Whilst the Celtic Manor is still developing, this resort does not represent all market sectors.</p> <p>Newport's environmental assets could also be used to enhance the tourism offer. Newport City Council is involved with a number of projects that are part of the long-term aim of returning the Monmouthshire &amp; Brecon Canals to navigable use. To date, substantial restoration works have been implemented at various locations on the canal including Bettws Lane Bridge, Gwastad Mawr and Ty Ffynnon Locks on the main line and Cefn Wharf Lock 21 and Gwastad Lock 2 on the Crumlin Arm. A funding application has been submitted to the Heritage Lottery Fund to restore two pairs of locks on</p>	sectors.	Cultural Heritage, Landscape	

Key Issues/ Opportunities	Implications for LDP	Relevant SEA Topic	Relationship to SA Objectives in Table 6.1
the Cefn Flight of Fourteen Locks and provide greater opportunities for all members of the community to have both physical and intellectual access to this important heritage asset.			
<p><b>Retail</b></p> <p>Newport is undergoing regeneration activities that will have an important impact on the County Borough. This will provide a significant opportunity for other areas to benefit from the 'drip-down' effects of this regeneration.</p> <p>Due to its current market share coupled with strong expenditure and population growth in the catchment, there is significant potential capacity for the city centre to attract more development in the run up to 2016.</p> <p>Ensuring the success of the City centre retail schemes is considered a key issue by the Overview &amp; Scrutiny Forum Development &amp; Employment.</p>	The focus for such capacity should be the City Centre and selected locations where regeneration and growth are evident.	Material Assets	27

## 6. Developing the Sustainability Appraisal Framework

### 6.1 Task A4

The next task in the sustainability appraisal is the development of the sustainability appraisal framework. The SA Framework is a key component in completing the SA by synthesising the baseline information and sustainability issues into a systematic and easily understood tool that allows the prediction and assessment of effects considered likely to arise from the implementation of the LDP. Though the SEA Directive does not specifically require the use of objectives or indicators in the SEA process, they are a recognised and useful way in which environmental effects can be described, analysed and compared at key stages of the plan development.

### 6.2 Methodology

A set of draft objectives, indicators and targets was drawn up under the three sustainable development dimensions: social, economic and environmental. Taken together, the indicators and targets provide a clarification of the intended interpretation of each objective, supported by a defined direction of change sought through the implementation of the LDP.

The draft SA objectives have been derived from the various PPPs that were reviewed as part of Task A1, collection of baseline data (Task A2) and the identification of key sustainability issues (Task A3).

When known, national, regional and local targets have also been included. The SA objectives have been worded so that they reflect one single desired direction of change for the theme concerned and do not overlap with other objectives. They include both externally imposed social, environmental and economic objectives; as well as others devised specifically in relation to the context of the Newport LDP. The SA objectives have also been worded to take account of local circumstances and concerns feeding from the analysis of sustainability issues.

A preliminary set of indicators has been derived to capture the change likely to arise from the LDP implementation and will play a role in the assessment itself. As the SA progresses it is likely that the set of indicators will be refined for the purposes of establishing a monitoring programme. Where appropriate, existing data sources and indicators that are already monitored in the Council area have been used. In some cases, specific new indicators are proposed, which are likely to require monitoring by relevant bodies should significant effects relating to the SA objectives concerned be predicted as part of the assessment of effects during SA Stage B.

### 6.3 Results

The SA framework of objectives, indicators and targets against which it is proposed to assess the LDP is set out in Table 6.1.



## 6.4 Sustainability Appraisal Framework

**Table 6.1 – Draft Sustainability Appraisal Framework**

### Key to Data Availability for Indicators

**Bold** = Known data for study area

*Italic* = Known data at regional level

Underlined = Data for study area and regional data currently unknown

No	SA Objective	Potential Indicators	Target	SEA Topics
<b>Environmental</b>				
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management.	<u>Countryside management schemes implemented</u>	Increase	Population, Human Health, Landscape, Soil
		<b><u>Woodland schemes implemented</u></b>	Increase	
		<u>Accessibility of the countryside by public transport</u>	Increase	
		% change in accessibility and connectivity of public rights of way <sup>10</sup>	Increase	
		<b>Amount of valued urban and rural open space lost to development</b>	Minimise- target of nil	
		<b>Total area of valued open space</b>	Increase	
		<b>Amount or proportion of landscape subject to enhancement associated with development</b>	Increase	
		<b>Proportion of valued landscape lost to development</b>	Minimise- target of nil	
2	To protect, manage and	<b>Numbers, area and condition of international, European,</b>	Welsh Assembly Government: by 2015, 95 per cent of Welsh SSSIs in favourable	Biodiversity, Flora,

<sup>10</sup> Public rights of way include: footpaths; bridleways; Byways Open to All Traffic (BOATs) and Restricted Byways (formally designated as Roads Used as Public Paths)

No	SA Objective	Potential Indicators	Target	SEA Topics
	enhance biodiversity	<b>national, regional and local designated sites</b>	condition; By 2010, 95 per cent of international sites in favourable condition; and by 2026, all sites to be in favourable condition.	Fauna, Soil, Water, Air, Climatic Factors, Human Health,
		<b>Loss of trees covered by TPOs</b>	Minimise- target of nil	
		Length of hedgerows	Increase	
		% change in tree planting	Increase	
		<b>% trees lost to development that are replaced</b>	Minimise- target of nil	
		<u>Species of acknowledged conservation concern</u>	Halt losses	
		<u>Amount of green space important for ecological connectivity identified and safeguarded from development</u>	LBAP targets to be added when they've been updated.	
		<b>Area of important wildlife habitat lost to other uses affecting functional viability</b>	Zero	
		<b>Amount of important wildlife species lost to other uses</b>	Zero	
		<u>No. of businesses achieving the Biodiversity Benchmark award</u>	No target identified	
		<b>Number and area of land and aquatic habitat creation schemes</b>	LBAP targets to be added when they've been updated.	
		<b>The area of land affected by planning applications approved that lead to loss of species, habitats of important biodiversity value</b>	Zero	
		<b>Extent of important habitats or landscapes present in commons</b>	LBAP targets to be added when they've been updated.	
		<b>Area of land enhanced for biodiversity value through the use of s106 agreements</b>	LBAP targets to be added when they've been updated.	
		<u>Extent of invasive species</u>	Decrease	

No	SA Objective	Potential Indicators	Target	SEA Topics
		<u>% of development and land use incorporating Green Infrastructure</u>	Increase	
		<u>% native species used in landscaping schemes</u>	Increase	
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	<b>% dwellings built on previously developed land subject to assessment against the sustainability objectives'</b>	60% (UK government)	Landscape, Soil, Climatic Factors, Air, Human Health, Biodiversity
		<b>% of residential sites developed at a density of 30-50 dph</b>	Increase- target 100%	
		<b>Number of empty properties</b>	Decrease	
		<u>Area of potentially contaminated land remediated and brought back into use</u>	Increase	
		<u>% of materials used that have been sourced from the local area</u>	Increase	
		<u>% of reclaimed materials used in development</u>	Increase	
		<u>% of planning permissions granted resulting in loss of grades 1,2 and 3a land</u>	Decrease	
		<u>Number of organics farming initiatives supported</u>	Increase	
		<u>Number and take-up of allotments</u>	Increase	
4	To improve air quality	<b>Number of (NO<sub>2</sub>) designated AQMAs</b>	Decrease – target of nil	Air, Climatic Factors, Human Health
		<b>Other recorded pollutants (Ozone, PM<sub>10</sub>)</b>	To meet statutory UK air quality criteria objectives	
		<b>No of exceedences of the 100ug/m<sup>3</sup> 8 hr mean NO<sub>x</sub></b>	No target identified	
		<b>Implemented measures of Air Quality Action Plan</b>	Increase	
		<b>Native vegetation and planting schemes to provide carbon sink capacity and improve air quality locally</b>	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
5	To reduce emissions of greenhouse gases	<b>Carbon Dioxide (CO2) emissions per capita</b>	Decrease 3% per annum	Air, Climatic Factors, Human Health
		<u>Methane emissions per capita</u>	Decrease 3% per annum	
		<u>Nitrous Oxide (NO2) emissions per capita</u>	Decrease 3% per annum	
		<u>Water vapour emissions</u>	Decrease 3% per annum	
		<u>Halocarbons emissions</u>	Decrease 3% per annum	
		<u>Ozone</u>	Decrease 3% per annum	
6	To minimise noise pollution	<b>No of residential permissions granted in TAN11 category C and D locations</b>	Nil	Human Health, Population
7	To maintain and, where possible, enhance water quality	<u>Improvements to existing off-line drainage</u>	Increase	Water, Human Health, Biodiversity, Flora and Fauna
		Development buffer zones along water courses	Increase	
		<i>Biological river quality</i>	Increase % of rivers of good or excellent quality	
		<i>River water chemistry levels</i>	Increase % of rivers of good or excellent quality	
		<i>Nutrient status of rivers (phosphate and nitrate levels)</i>	% decrease in rivers with high levels of nutrients	
		<i>Groundwater Quality</i>	Increase	
8	To reduce water consumption	<u>No of grey water systems used in new developments</u>	Increase	Water, Human Health, Climatic Factors
		<u>Incorporation of dual water supplies into developments</u>	Increase	
		<u>Installation of low water use appliances into developments</u>	Increase	
		<u>Internal potable water use of less than or equal to 32m3 per bedspace per year</u>	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
		<u>Installation of water efficient fixtures</u>	Increase	
		<u>Rainwater collection system for watering gardens and landscaped areas</u>	Increase	
		<u>Water abstractions at source</u>	Increase	
9	To minimise the risk of and from flooding	<b>% of development approved in flood risk areas contrary to TAN15</b>	Zero	Water, Human Health, Climatic Factors, Population, Landscape, Material Assets
		<b>% relevant permissions with SUDS schemes where appropriate</b>	by 50% in areas of low probability of flooding, 75% in areas of medium flood risk, and 100% in areas of high flood risk, at peak times from: <ul style="list-style-type: none"> <li>• Hard surface runoff</li> <li>• Roof runoff</li> </ul>	
		<u>Number of properties at risk of flooding</u>	Decrease	
		<u>% of flood plain used for flood storage/alleviation, coastal squeeze management, biodiversity enhancement</u>	Increase	
10	Increase energy efficiency	<u>Energy consumption per capita</u>	Decrease	Climatic Factors, Population, Air, Human Health
		<b>Dwellings improved for their energy efficiency, addressing fuel poverty</b>	Increase	
		<b>Development served by heating and hot water systems with an average NOX emission rate of less than or equal to 40 NOX mg/kWh</b>	Increase	
		<b>Provision of eco labelled white goods</b>	Increase	
		<u>Number of businesses achieving Green Dragon standard</u>	Increase	
		<b>SAP ratings of new housing</b>	The target SAP for all dwellings is a minimum of 65 described under the Home Energy Conservation Act (HECA) 1995	

No	SA Objective	Potential Indicators	Target	SEA Topics
		<b>Development where 75% dedicated low energy lights have been specified</b>	Increase	
11	Promote renewable energy production and use	<i>Residual electricity generated from renewable sources following energy efficiency measures</i>	Increase	
		No of planning permissions for environmentally appropriate renewable energy schemes	Increase	
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	<b>Total Municipal Waste reduced</b>	By 2010, achieve a reduction in waste produced (by the authority) equivalent to at least 10% of the 1998 arisings figure.	Climatic Factors, Material Assets, Landscape, Human Health, Soil
			By 2020, waste arisings per person should be less than 300kg per annum	
		<b>% of Municipal Waste recycled/reused</b>	17.50% (NCC by 2010) By 2009/10, achieve at least 40% recycling/composting with a minimum of 15% composting (with only compost derived from source segregated materials counting) and 15% recycling.	
		<b>% Waste Composted/Treated Biologically</b>	15.50% (NCC) by 2010 By 2009/10, achieve at least 40% recycling/composting with a minimum of 15% composting (with only compost derived from source segregated materials counting) and 15% recycling.	
		<b>% of commercial waste recycling</b>	25% by 2010 (WAG)	
		<b>%of Municipal waste composted</b>	25% by 2010 (WAG)	
		<b>% of Municipal waste used to recover heat or energy</b>	No target identified	
		<b>% biodegradable municipal waste (BMW) being landfilled</b>	by 2010 to reduce BMW landfilled to 75%	

No	SA Objective	Potential Indicators	Target	SEA Topics
			(by weight) of that produced in 1995 (Landfill Directive) (2013: 50%; 2020: 35%)	
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	<u>% of dwellings built to Code for Sustainable Homes Level 6 (WAG definition)</u>	Increase – All buildings to meet Code for Sustainable Homes Level 3 by 2009	Climatic Factors, Material Assets, Human Health
		<u>% of commercial buildings meeting BREEAM Excellent Standard or equivalent</u>	All buildings to be zero carbon by 2011	
		<u>% of development with a design statement submitted</u>	100%	
		<u>Major schemes where DCfW has been consulted</u>	Increase	
Social				
14	Improve equality of opportunities amongst all social groups	<b>No of wards in the 100 most deprived wards according to Index of Multiple deprivation</b>	Decrease	Population, Human Health
		<b>% of population of working age claiming benefits</b>	Decrease	
		<b>Proportion of children under sixteen living in low income households</b>	Decrease	
15	Improve the health and wellbeing of the population	<b>Infant Mortality Rates</b>	Decrease	Population, Human Health, Air
		<b>Limiting long term illness</b>	Decrease	
		<b>Distance and transport accessibility to access health care facilities</b>	Improve	
		<b>% Extra Curricular activities (7-11/11-16 year olds)</b>	70%/60% (05 Sports Council for Wales)	
		<u>Adult physical activity</u>	(see local area partnership agreement not yet published)	

No	SA Objective	Potential Indicators	Target	SEA Topics
		<u>Provision of accessible natural greenspace reaching CCW standards</u>	Achieve 100% conformity	
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	<b>Provision of accessible open space reaching NPFA standards</b>	Achieve 100% conformity	Population, Human Health, Material Assets, Air
		<b>Level of community infrastructure per ward</b>	Increase	
		<b>Loss of local community facilities</b>	Decrease	
		<b>Number of S106 agreements secured on new developments for improvements in community facilities</b>	Increase	
		<u>Provision of NEAPs and LEAPs</u>	Increase	
17	Improve the quantity, quality, variety and affordability of housing	<b>No of new affordable units delivered and integrated into developments in relation to population growth</b>	Increase	Population, Human Health, Material Assets
		<b>% of eligible residential planning permissions where affordable housing has been negotiated</b>	Increase	
		<b>Number of people from vulnerable groups with access to safe, secure accommodation that meets their needs</b>	Increase	
		<b>% of houses meeting Welsh Housing Quality Standard</b>	100%	
		<b>Affordability of housing for people in lower quartiles of income</b>	Increase	
		<b>Land provided to meet the needs of gypsies and travellers</b>	Increase	



No	SA Objective	Potential Indicators	Target	SEA Topics
18	To contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods	<b>Average crime rate in Newport per 1000 population</b>	<ul style="list-style-type: none"> <li>To reduce assaults by 6% each year (18% over three years)</li> <li>To reduce vehicle crime by 6% each year (18% over three years)</li> <li>To reduce robbery by 6% each year (18% over three years)</li> <li>To reduce domestic burglary (incl. attempts) by 6% each year (18% over three years)</li> <li>To reduce business crime by 6% (18% over three years)</li> <li>To reduce criminal damage (excl. 59) by 6% each year (18% over three years)</li> </ul>	Population, Human Health
		Fear of crime per ward during the day and at night	To reduce the level of ASB by 5% per annum each year for the three year period	
		<b>Provision of accessible open space reaching NPFA standards</b>	Increase	
		<b>% of development that meets the 'secured by design' certification criteria</b>	Increase	
		<b>% of public realm with natural surveillance</b>	Increase	
		<b>Proportion of city centre covered by CCTV</b>	Increase	
19	To conserve and enhance the historic environment of Newport	<b>No and condition of listed buildings</b>	No target identified	Material Assets, Landscape, Climatic Factors
		<b>No of buildings on buildings at risk register</b>	Decrease	
		<b>Planning permissions granted against conservation officer recommendations</b>	Nil	
		<b>Number of conservation area appraisals undertaken during plan period</b>	Increase to full coverage	

No	SA Objective	Potential Indicators	Target	SEA Topics
		<b>Application of ASIDOHL to development in Gwent Levels</b>	100%	
		Area of ancient woodland and planted ancient woodland	Increase	
		<u>No. of Scheduled Ancient Monuments adversely affected</u>	Nil	
		<u>No. of Historic Parks and Gardens adversely affected</u>	Nil	
20	To identify, promote, strengthen and enhance the cultural identity of Newport	<b>% of welsh speakers in Newport</b>	Increase	Material Assets, Landscape, Population, Human Health
		<b>% change in the number of community groups registered</b>	Increase overall number	
		<b>% of pupils in welsh medium education</b> note: additional indicators are being internally discussed and are ongoing	Increase	
		<u>Cultural and arts events and activities taking place within Newport</u>	Increase	
		<u>% people benefiting from the Chartist Citizenship project</u>	Increase	
Economic				
21	To enable high and stable levels of local employment in Newport	<b>% change of economically active</b>	Increase	Material Assets, Population
		<b>% of population employed</b>	Increase	
		<b>% good quality local jobs created</b>	Increase	
		<u>Density of jobs per hectare</u>	No target identified	
		<b>% change in provision of highly skilled employment opportunities</b>	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	<b>Mix of employment by sector (%)</b>	Achieve more equitable balance	Material Assets, Population
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	<b>Total number of visitors to attractions in Newport</b>	Increase	Material Assets, Population
		<b>Number of jobs created in the tourism sector</b>	Create a further full time 250 jobs whilst supporting the present 3635 FTE	
		<i>Expenditure by sector</i>	Increase	
		<i>Revenue by category of visitor</i>	Increase the value of Tourism by 20%	
		<i>Tourist Days</i>	Increase	
		<i>Bed Space Availability</i>	Increase	
		Number of visitors to the wetland reserve	Increase	
		Number of visitors attracted by the historic landscape	Increase	
		<b>Use of the Monmouthshire &amp; Brecon Canal for walking/cycling, nature conservation and other water based recreation as well as a navigation route</b>	Increase	
24	To contribute to educational attainment and increase skill	<b>Proportion of 19 year olds with Level 2 qualifications (5 GCSE A*-C or NVQ equivalent)</b>	Increase	Population, Material Assets
		<b>% of population attaining highest qualification – Level 4/5</b>	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
	levels to promote/develop a knowledge based economy	<b>% of young people in post-16 education</b>	Increase	
		<b>% with no qualifications</b>	Decrease	
		<b>% of school age pupil exclusion rates</b>	Decrease	
		<b>Key Stage 4 achievement levels</b>	Increase	
		<b>% of people with basic skills through 'The Basic Skills Employer Pledge'</b>	Increase- target 100%	
		<b>% increase in adult education courses</b>	Increase	
		<u>% increase in Welsh Medium education</u>	Increase	
		<u>Retention of students post qualification</u>	Increase	
		<b>S106 agreements that provide educational facilities where appropriate</b>	Increase	
25	Reducing the need to travel by improving local service provision	<u>Provision of sufficient IT infrastructure and space within new dwellings to enable home working</u>	Increase	Population, Material Assets, Air, Climatic Factors, Human Health
		<b>Provision of a sufficient level of local facilities according to thresholds</b> note: additional indicators are being internally discussed and are ongoing	Increase see Appendix A for thresholds	
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of	<b>No of safe routes to school schemes</b>	Increase	
		<b>Proximity of new development to public transport nodes</b>	Increase	
		<b>No and implementation of good quality green travel plans</b>	Increase	
		<b>Modal Split - % of population travelling to work by sustainable modes, including working from home</b>	Increase % by sustainable modes	
		<u>Integration of Sustrans routes with built development</u>	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
	transport, including walking and cycling	<b>No and value of S106 agreement secured for improvements in public transport, cycling and walking where appropriate</b>	Increase	
27	To seek to improve the vitality and viability of the City Centre	<u>Footfall counts</u>	Increase footfall	Population, Material Assets
		<u>Independent retailer representation</u>	Increase	
		<u>Mix of uses in the City Centre</u>	No target identified	
		<u>Vacancy rates and % of available floorspace that is vacant</u>	Decrease: below 10% ATCM	
		<u>Rental levels per square foot</u>	Increase	
		<u>Residents' and visitors' satisfaction with local area and facilities</u>	Improve	

## 6.5 Assessment Rationale

The assessment rationale, presented in Table 6.2, is an interpretation of the SA Framework. This will be utilised to assist the assessment of policies and proposals contained in the LDP. The SA Framework covers Newport as a whole, and thus all issues apparent at the time of writing are covered, where considered appropriate to the SA. However, SA is an iterative process, and new or site specific issues that may arise throughout the plan making process will be subsumed into the SA framework for the LDP during its development.

**Table 6.2 – Assessment Rationale**

No.	Objective	Rationale
<b>Environmental</b>		
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management.	<p>In order for the LDP to achieve this objective, policy content should consider the need to balance the requirements of different landscape users, with a view to enhancing landscape character. The assessment of the plan will include the consideration within policy content of accessibility to the countryside, which will include aspects such as the rights of way network and access via public transport.</p> <p>Additionally, policies should seek to limit the effect of development on the landscape, including open land lost to built development, as well as the efficient use and appearance of development.</p> <p>Secondary beneficial effects will be associated with policies that will reduce traffic levels in the Council area, as well as other non-intrusive management and exclusion measures. The cumulative impact of encroachment on greenfield sites, air pollutants, noise and vibration as well as potential for incremental changes to the physical environment will be considered in relation to their effect on the landscape as well as it's users from a physical as well as visual amenity perspective.</p>
2	To protect, manage and enhance biodiversity	<p>The LDP policies should seek to enhance designated and non-designated habitats and species. This may be achieved through increasing connectivity and/or reducing disturbance. Connectivity is important in order to enable migration of species, especially in the changing climate, and to enhance biodiversity. This might be done through the reinstatement/enhancement of hedgerows as well as the development of green infrastructure across urban areas, connecting urban areas with rural. Trees are an especially pertinent element of the landscape that provide important biodiversity value as well as value for human wellbeing and health, air quality, and urban drainage.</p> <p>It is important that any vegetation types are native species to the area, to ensure the reduction of invasive species that may limit and damage biodiversity.</p> <p>The policies should also seek to result in the conservation, enhancement or creation of habitats, including those in both land and marine environments.</p> <p>The 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.</p>
3	To ensure efficient use of land and	To enable the achievement of this sustainability objective, the LDP policies should seek to make the best use of land and buildings.

No.	Objective	Rationale
	protect geodiversity, soil quality and mineral resources	<p>This may be achieved through the encouragement of higher density development and the use of previously developed land and buildings as a priority.</p> <p>Through using previously developed land, consideration should be given to land with a low biodiversity value in the first instance.</p> <p>In relation to areas of land that are contaminated, policies should seek to reduce land contamination and safeguard soil quality and quantity.</p> <p>Policies should seek to encourage the local sourcing of materials, in order to protect geodiversity and mineral resources, alongside soil resources. The use of reclaimed materials should also be prioritised as in objective 12. All policies should include full consideration of potential impacts on the natural environment particularly landscape and protected sites and species.</p> <p>In order to encourage the local production and consumption of food, soil resources and land should be protected and enhanced for supporting organic farming initiatives and allotments.</p> <p>Secondary consideration of the effects of climate change on soils, such as the loss of organic content, will be made and the policies within the LDP should seek to mitigate these.</p>
4	To improve air quality	<p>This sustainability objective should be sought to be achieved through the LDP policies, primarily through the reduction in the volume of motorised traffic through a modal shift to more sustainable modes and improved traffic flow and reduced congestion. Significant construction activities may reduce air quality during the period of works and the policies should promote mitigation of these effects.</p> <p>Although the LDP is unable to affect the activities of the M4 and the proposed M4 relief road, it should include policies to mitigate air quality effects locally. This may include planting schemes to provide ameliorative effects through absorption/cleansing of pollutants.</p> <p>There should be a positive correlation between air quality, health improvements and the use of more sustainable modes of transport.</p>
5	To reduce emissions of greenhouse gases	<p>The LDP should seek to achieve this objective through reducing emissions that arise from buildings, land use change, transport, agriculture, consumer goods, amongst others. Policies could encourage more sustainable layouts within development, as well as adherence to guidance such as the Code for Sustainable Homes and BREEAM as identified in objective 13.</p> <p>A major consideration will be the extent to which policies encourage an improvement in sustainable transport for access to decrease traffic congestion and volume, as identified in objectives 25 and 26.</p>
6	To minimise noise pollution	<p>In order that the LDP contributes to the achievement of this sustainability objective in the plan area, its policies should seek to locate noisy uses away from noise sensitive uses, taking a holistic approach. Alongside this, policies should seek to ensure that noise pollution is minimised.</p> <p>Significant construction activities may increase noise pollution during the period of works, and the policies should promote mitigation of these effects. Additionally, the encouragement of a shift to non-motorised forms of transport will enable a reduction in noise in the urban and rural areas.</p>

No.	Objective	Rationale
7	To maintain and, where possible, enhance water quality	LDP policies should seek to have a positive effect on maintaining and enhancing the quality of surface and ground waters. This will include policies to control the following, amongst others: surface water run-off from impermeable surfaces; proximity of development and agriculture to watercourses; and intensity of development. Sewage discharges into watercourses should be prevented. The opening up of culverts into watercourses and increasing the length of watercourse restored/impacted on should be considered. SUDS identified in Objective 9 may help to reduce surface water run off and subsequently improve water quality.
8	To reduce water consumption	In order to reduce water consumption through the LDP, its policies should seek to deliver measures to encourage a responsible approach to water use, re-use and conservation. Conservation methods may include grey water recycling, incorporation of dual water supplies, low water use appliances, other water efficient fixtures and water metering, to reduce pressure on potable water resources.
9	To minimise the risk of and from flooding	<p>Minimising the risk from flooding to people and property, as well minimising the frequency of flooding events should be a key policy consideration in the LDP. This is especially important with the increasing effects of climate change. Assessments will include the consideration of effects on flood risk from all sources either directly or indirectly through proximity/ location within areas of flood risk (for example through locating development in flood plains), or indirectly through exacerbation of effects downstream or increasing the proportion of impermeable surfaces. Policies should result in a decrease in flood risk, which may include policies to encourage Sustainable Urban Drainage Systems.</p> <p>An increased risk from flooding to people and property may be reduced through policies to prevent increased density of development in flood risk areas. Other possible risk reduction measures that could be included within policy may include the following:</p> <ul style="list-style-type: none"> <li>a change in land use to reduce the vulnerability of the proposed development;</li> <li>a reduction in the building platform area;</li> <li>the raising of internal floor levels and flood proofing (within existing buildings) to reduce potential flood damage;</li> <li>the rearrangement of buildings within the site to remove obstructions to overland flow paths; and</li> <li>the placement of buildings to higher areas within the site to limit the risk of flood damage and/or enable the provision of escape routes</li> </ul> <p>alternative uses for flood risk areas in terms of biodiversity, flood storage/alleviation, managing coastal squeeze etc</p>
10	Increase energy efficiency	<p>The LDP should include policies that will directly reduce energy demand by encouraging energy efficiency. Policies may include the encouragement of improving the energy efficiency of dwellings through measures such as improved insulation; efficient heating and hot water systems; eco labelled white goods installed; and the use of low energy lighting.</p> <p>Assessment of the achievement of this sustainability objective will also consider indirect effects such as development located to</p>



No.	Objective	Rationale
		<p>reduce transport distances and design factors such as building orientation (linked to passive solar gain) and building form.</p> <p>The extent to which policies promote the use of low embodied energy materials from sustainable sources and material from local sources and suppliers in the construction of new developments will be assessed.</p> <p>This objective is directly linked to objective 13 which encourages sustainable design and construction.</p>
11	Promote renewable energy production and use	<p>In order to promote renewable energy production and use through the LDP, policies could specify the need for all developments to assess the potential for microgeneration within their sites, implementing wherever possible as a condition of permission to provide residual energy following a series of energy efficiency measures.</p> <p>Policies could also specify that a certain percentage of energy used on the site must come from renewable sources, generated either on site, or elsewhere where on site generation is not feasible. Policies should promote new energy generation, to include full evaluation of potential impacts on the natural and historic environment, particularly landscape and protected sites and species.</p> <p>This objective is also directly linked to objective 13 to encourage sustainable design and construction.</p>
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	<p>In order for the LDP to achieve more sustainable waste management, it could include policies that directly reduce the generation of waste and increase the recycling of waste against standard levels expected for development, e.g. by providing recycling and composting facilities within and near to homes as well as public buildings and areas. Policies should also specifically refer to the need to reduce, re-use and recycle construction waste.</p> <p>The LDP should also include the allocation of sufficient land to enable as much self sufficiency in waste management and processing as possible.</p>
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	<p>To enable the promotion and subsequent installation of sustainable and high quality design in all development, the LDP could include policies that encourage the adherence to standards as outlined in BREEAM, The Code for Sustainable Homes, and Secured By Design guidance. This will enable development to reduce its impact on as well as adapt to climate change effects such as temperature change. Additionally, policies should encourage the consultation of the Design Commission for Wales in all major developments, as well as require the submission of design statements for all developments.</p>
<b>Social</b>		
14	Improve equality of opportunities amongst all social groups	<p>In order to contribute towards this objective, the LDP should seek to improve the distribution of and access to employment opportunities, services and facilities across the plan area. Improving standards and affordability in housing and encouraging a varied social mix within communities may also be included. Measures to improve the image of some areas should be considered, including improving safety, discouraging crime through design and increasing community involvement in development activities, for example through policies promoting public art. Policies should focus efforts</p>

No.	Objective	Rationale
		on the areas suffering from the highest levels of deprivation.
15	Improve the health and wellbeing of the population	In order to improve the health and wellbeing of the population, through its policies, the LDP could seek to improve access to health facilities. Indirectly, health levels could be improved through secondary effects of policies to reduce air pollution; ensuring homes are of a decent standard and decreasing noise pollution as well as traffic congestion. Improving walking and cycling facilities (as identified in objective 26) as well as community facilities (as identified in Objective 16) for both purposeful and recreational trips will both improve physical activity levels as well as decrease air pollution and traffic. Improving access to and provision of greenspace and improving the physical environment in general may increase both informal and formal physical activity levels, as well as create a general sense of wellbeing.
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	Accessibility might be improved in the LDP through policies to improve public rights of way and their integration and connectivity within new development.  LDP policies could include new or enhanced provision of facilities, including open space and space for play/sport/recreation, as well as improved access either directly through increased provision in areas of deficiency, or indirectly through improved transport links in relation to the thresholds indicated in Objective 25 and Appendix A. This policy is also related to objective 26 which seeks to improve public transport provision and use, improving accessibility for all sectors of the community.
17	Improve the quantity, quality, variety and affordability of housing	The LDP should seek to provide policies that ensure a supply of housing that is appropriate to local needs, especially in relation to population growth. The affordability, high quality and mix of housing to create more sustainable communities should be prioritised. This might be ensured through the requirement for all housing, including private housing, to meet the Welsh Housing Quality Standard. Affordable housing should be provided within a mix of types and tenures of housing to ensure mixed communities.  Policies should consider whether residential development is in accessible locations and supported by adequate infrastructure capacity, including transport, waste and water considerations. Additionally, the LDP should provide a policy to cater for the needs of gypsies and travellers within the plan area.
18	To contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods	The LDP should include policies that engender a sense of safety and reduce crime and fear of crime through indirect measures such as incorporating design features in new development (such as additional lighting, CCTV, active street frontages, development reaching 'secured by design' standards). Policies could seek to discourage incidences of anti-social behaviour and opportunistic crime, often attributed to 'boredom' or a 'lack of things to do', through increasing the range and availability of community facilities, especially open and green space and leisure facilities.
19	To conserve and enhance the historic environment of Newport	The LDP should seek to have a positive effect on Listed Buildings, Buildings at Risk, Conservation Areas, Scheduled Ancient Monuments, Historic Parks and Gardens, Ancient Woodlands and the Gwent Levels historic landscape. Negative physical change or increased disturbance should be avoided. Policies should seek to encourage sympathetic integration of development with local

No.	Objective	Rationale
		<p>character.</p> <p>Alongside designated features, non-designated features of local historical and architectural interest and value should also be considered, since these can make an important contribution to creating a sense of place, local identity and distinctiveness in both rural and urban areas. Beyond site specific areas, consideration should be given to landscapes and townscapes, as well as the potential for unrecorded archaeological interest.</p> <p>Policies that reduce traffic levels will provide secondary benefits, as will other non-intrusive traffic management and exclusion measures.</p> <p>Policies to reduce the effects and contribution to climate change could help to reduce the impact on heritage sites from weather events.</p> <p>The impact of encroachment on greenfield sites, air pollutants, noise and vibration as well as consideration of the cumulative impact of incremental changes to the physical environment, particularly in the setting of sensitive sites/ buildings, will also be reflected in the assessment.</p>
20	To identify, promote, strengthen and enhance the cultural identity of Newport	The LDP should seek to identify the cultural identity of Newport in order to enable a policy direction that seeks to promote, strengthen and enhance this identity. Policies may include the encouragement of an increase in welsh speakers, community groups, cultural events and activities, and welsh medium education.
<b>Economic</b>		
21	To enable high and stable levels of local employment in Newport	In order to contribute to local employment levels, the LDP should seek to provide land and buildings for employment use, in locations that are accessible by sustainable modes. Assessment of LDP policies will consider the creation of new employment opportunities and the characteristics of the employment provided including aspects such as employment sector, wage levels, skill requirements, and the contribution this will make to the long term sustainability of employment opportunities in the area. This objective will be furthered through the development of objective 24.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	The LDP may contribute to economic growth in a variety of different ways – availability of different employment types; enhanced access to employment sites for all modes; enhancement of infrastructure to support the development of new areas; secondary, multiplier or ‘seeding’ effects of particular types of development; measures to attract and retain a more diverse workforce; and enhancement of the landscape, townscape and/or other aspects of local ‘image’ to support investment. Most of these measures are addressed within other objectives in the SA Framework, and cumulatively will help to improve the economy. The LDP could encourage a range of facilities to enable a diverse range of employment opportunities to arise, creating more viable and sustainable economic growth.
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental,	In order to contribute to the achievement of this objective, the LDP should include policies that seek to encourage other sustainability objectives within the framework. Improvements in accessibility to, as well as within the plan area, will also increase its appeal as a visitor attraction. Decreasing air pollution through a shift to more sustainable modes of transport; improving the recreational and leisure offer; enhancing the landscape and historic assets; and

No.	Objective	Rationale
	heritage, and leisure assets	<p>enhancing green spaces and biodiversity will also enhance environmental, heritage and leisure assets and their settings.</p> <p>Additionally, policies should seek to improve visitor specific facilities such as accommodation. The combination of these factors, alongside an encouragement of visitors to the plan area, encouragement of improved visitor facilities at attractions such as that at the Newport wetlands, and ensuring sustainable modes of transport include linkages within as well as to areas outside of Newport, will help to improve the tourism economy.</p>
24	To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy	<p>In order to promote the development of the knowledge based economy, LDP policies should contribute towards improvements in existing education facilities or the creation of additional educational facilities, specifically tertiary and higher education centres. Non-academic education should also be encouraged as a complement to LDP policies, such as schemes including 'The Basic Skills Employers Pledge'.</p> <p>The increase in skills levels in relation to improving business competitiveness is a priority in the area. Measures included within policies to augment passive education such as interpretation of the natural and historic environment and community involvement in development initiatives will also be included in assessments.</p>
25	Reducing the need to travel by improving local service provision	<p>The LDP should encourage a reduction in the need to travel, through ensuring that development is served by an adequate range of local facilities and employment opportunities to meet community needs. The following services may be included as priorities alongside other employment opportunities:</p> <ul style="list-style-type: none"> <li>• nursery/first school;</li> <li>• primary/middle school;</li> <li>• secondary school;</li> <li>• health centre;</li> <li>• local shop;</li> <li>• pub;</li> <li>• post office;</li> <li>• community centre;</li> <li>• local centre;</li> <li>• district centre/superstore;</li> <li>• leisure centre;</li> <li>• place of worship;</li> <li>• outdoor open access public area;</li> <li>• children's play area;</li> <li>• pharmacy</li> </ul> <p>(for thresholds see Barton et al. (2003) in Appendix A)</p> <p>Policies that encourage home working through the installation of home offices, a requirement of BREEAM, and IT infrastructure will</p>

No.	Objective	Rationale
		be commended.
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	This objective should be sought to be achieved through LDP policies to accommodate the residual travel requirements after objective 25 to reduce the need to travel. The 'transport hierarchy' should be prioritised, as identified in the Manual for Streets. Policies should prioritise the encouragement of walking and cycling as the first option to reduce the current reliance on the private car, to decrease overall reliance on motorised transport. This might include the identification where possible and integration of the national Sustrans network within developments. Policies should subsequently seek to encourage a modal shift to bus and train transport, by improving frequency, reliability and convenience of services, especially with regard to journeys to work and school. This will have positive effects on greenhouse gas emissions, as well as human health and local air quality. Specific journeys such as travel to work and routes to school could be prioritised as an initial focus for policy development.
27	To seek to improve the vitality and viability of the City Centre	In order to contribute to this objective, the LDP should include policies to support the regeneration of the City Centre, through the allocation of sites for retail use as part of a mix that includes residential, leisure and employment uses, to encourage an increase in footfall throughout the day and into the evening.

## 7. Proposed Structure and content of the Sustainability Appraisal Report

The results of the appraisal will be presented in a Sustainability Appraisal Report. The SA report will build on the findings of this scoping report and will comprise of stages B and C (as illustrated in section 1). It is proposed that this will broadly follow the structure proposed in the SA guidance (see Table 7.1). However, there may be some modification to these contents as the SA progresses.

**Table 7.1 – Proposed SA Report Structure**

SA Report Component	Contents
Components making up the Environmental Report	Table sign-posting the components of the SA Report, which make up the Environmental Report for the purposes of the SEA Directive
1. Summary and outcomes	Non-technical summary A summary of the findings of the SA into the LDP highlighting the likely significant effects of the plan Statement on the difference the SA has made to the LDP to date How to comment on the report
2. Appraisal methodology	Approach adopted to the SA When the SA was carried out, by who, and who was consulted, when and how Difficulties encountered in compiling information or in the assessments of effects
3. Background	Purpose of the SA and SA Report Plan objectives and outline of contents Compliance with the SEA Directive / Regulations
4. Sustainability objectives, baseline and context	Links to other strategies, plans and sustainability objectives, with information on synergies or constraints. Description of the social, environmental and economic baseline characteristics and the predicted future baseline. Main social, environmental and economic issues and problems identified Limitations of the information, assumptions made, etc. The SA framework, including objectives and indicators
5. Plan issues and options	Main strategic options considered and how they were chosen Comparison of the social, economic and environmental effects of the options How the social, economic and environmental effects of the options were considered in choosing the preferred options Other options considered, and why these were rejected.

SA Report Component	Contents
	Any proposed mitigation measures
6. Plan policies	<p>Significant social, environmental and economic effects of the preferred options</p> <p>How the social, environmental and economic issues were considered in developing the policies and proposals</p> <p>Proposed mitigation measures</p> <p>Uncertainties and risks</p>
7. Implementation	<p>Links to other tiers of plans and programmes and the project level</p> <p>Proposals for monitoring</p>

From Figure 40: Example structure and contents of the SA Report. Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, ODPM November 2005.



## 8. References

**Local Development Plan Manual**, Welsh Assembly Government (2006)

**A Practical Guide to the Strategic Environmental Assessment Directive**, ODPM (September 2005).

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**Environmental Assessments of Plans and Programmes Regulations** (Statutory Instrument 2004 no. 1633).

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**Environmental Quality in Spatial Planning** – Environment Agency and others (2005)

**Directive 2001/42/EC** "on the assessment of the effects of certain plans and programmes on the environment", European Commission (2001)

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**Lifetime homes, lifetime neighbourhoods**, 25 Feb. 2008, Communities and Local Government, A National Strategy for Housing in an Ageing Society, 07HHSO5076

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**Office of National Statistics annual survey** 2005.

**Strategic Environmental Assessment and Biodiversity: Guidance for Practitioners**. Countryside Council for Wales, *et al* (June 2004).

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**Strategic Environmental Assessment and Climate Change: Guidance for Practitioners**. Countryside Council for Wales, *et al* (May 2004).

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

Available at : <http://www.odpm.gov.uk/index.asp?id=1161341>



## 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"> <li>• Agenda 21</li> <li>• Convention in Biological Diversity</li> <li>• Statement of Principles of Forests</li> <li>• Declaration on Environment and Development</li> <li>• UN Framework Convention on Climate Change</li> </ul>	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>

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		<p>Recommend consideration of the following in the PPP review</p> <ul style="list-style-type: none"> <li>• EU Directive on Environmental Impact Assessment</li> <li>• The Aarhus Convention and EU Directive on providing public participation in the drawing up of certain programmes relating to the environment</li> <li>• EU Rural Development Policy</li> <li>• European Common Agricultural Policy (reform 2003)</li> <li>• Renewable Energy Coalition</li> <li>• Intelligent Energy Europe – Community Supports Programme</li> <li>• Environmental Liability Directive (2004/35/CE)</li> <li>• European Employment Strategy</li> <li>• Farming for the Future (Defra)</li> <li>• Section 42 list of Habitats and Species of Principal Importance for the Conservation of Biological Diversity (Wales Biodiversity Partnership 2003)</li> <li>• River Usk Catchment Abstraction Management Strategy (CAMS)</li> </ul> <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"> <li>• area of ancient woodland and planted ancient woodland</li> <li>• number of tree preservation orders</li> <li>• length of hedgerows</li> <li>• % trees replaces</li> <li>• no. of SUDS schemes</li> <li>• habitat creation schemes</li> </ul>	<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>

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"> <li>use of native species within landscaping schemes</li> <li>no. of businesses achieving the Biodiversity Benchmark award</li> </ul>		
126	Gwent Wildlife Trust	<p>App. A2</p> <p>Request following addendums in table:</p> <ul style="list-style-type: none"> <li>Newport Wetland is now a National Nature Reserve</li> <li>Gwent Wildlife Trust and WING manage the Solutia Reserve at Great Traston Meadows (which partly falls within the Nash and Goldcliff SSSI)</li> <li>of the sites listed, WIND now manages only the Allt yr Yn LNR and shares management of the Solutia Reserve</li> <li>Ringland Wood is now managed by a 'Friends of' community group.</li> <li>Caerleon Comprehensive Nature Reserve has always been managed by the school</li> <li>The other sites (Duffryn Pond, Oaklands, Lodge Wood) are not managed by WING.</li> </ul>	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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
126	Gwent Wildlife Trust	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).  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.	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	Series of comments relating to suggested indicators: 1 Obj. 1 definition required for woodland management schemes 2 Obj. 1 query ability to monitor uptake of guided walks 3 Obj. 1 definition required for 'valued open space; and 'valued landscape' 4 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) 5 Obj 2 increasing population size of protected species should be defined as increase in range and/or increase in number of individuals 6 Obj. 2 require definition for 'important wildlife habitat' – recommend this should be Section 42 habitat 7 Obj. 2 recommend indicator relating to extent of invasive species (Jap. Knotweed or Himalayan balsam)	Suggestions for additional indicators are welcome. SR should incorporate reference to those matters that can be readily influenced by planning policy.  6- the section 42 list refers to species rather than habitats.	1 Definition provided in glossary. 2 Indicator deleted 3 Definitions provided in glossary. 4 included in SAF 5 included in SAF 6 Definitions (including species and habitats) provided in glossary.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		8 Obj. 2 recommend indicator to reflect contribution of landscaping schemes to biodiversity e.g. % native species used in landscaping schemes 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' 10 Obj. 4 recommend modifying vegetation and planting schemes to promote the use of native species 11 Obj. 5 suggest matching water quality indicators to the WFD classifications for ease of monitoring 12 Obj. 5 suggest an additional indicator of 'native vegetation and planting schemes to provide carbon sink capacity and improve water quality locally' 13 Obj. 10/12 recommend addition of 'number of businesses achieving the Green Dragon standard' 14 Obj. 16 recommend a target of achieving the CCW accessible natural greenspace standard as well as the NPFA standard		7 included in SAF 8 included in SAF 9 included in SAF 10 included in SAF 11 included in SAF 12 included in SAF (omitting reference to water quality) 13 included in SAF 14 included in SAF
250	Persimmon Homes (via WYG)	Recommend addition of the following to the PPP list: <ul style="list-style-type: none"> <li>• PPW, WAG March 2002</li> <li>• MIPPS 01/2005 Planning for RE</li> <li>• MIPPS 02/2005 Planning for Retailing and Town Centres</li> <li>• MIPPS 01/2006 Housing</li> <li>• MIPPS 01/2008 Planning for Good Design</li> <li>• Local Development Plans Wales: Policy on Preparation of LDPs</li> <li>• The Six Acre Standard: minimum standards for outdoor playing space</li> <li>• LANDMAP</li> <li>• Joint Housing Availability Study for Newport</li> <li>• Housing Needs Study (if available)</li> </ul>	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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
250	Persimmon Homes (via WYG)	<p>Recommend reference to the following sources of data:</p> <ul style="list-style-type: none"> <li>• LANDMAP aspect areas (visual and sensory; historic; cultural; habitat; geology)</li> <li>• Registered Common Land</li> <li>• open access land</li> <li>• SAMs</li> <li>• LBs</li> <li>• Registered Parks, Gardens and Landscapes</li> <li>• Designated Conservation Areas</li> <li>• Schools rolls (surplus capacity)</li> <li>• agricultural land classification</li> </ul>	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"> <li>• Obj. 9 the target for % development approved in flood risk areas contrary to TAN 15 should be nil</li> <li>• Obj. 19 should include reference to SAMs and LBs</li> </ul>	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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		<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.



Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		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"> <li>Wales Biodiversity Framework</li> <li>One Wales: Connecting the Nation: The Wales Transport Strategy</li> <li>delete TAN 5 1996; insert TAN5 Consultation version 2006</li> <li>Road Traffic Reduction Act</li> <li>Reference to the Environment Strategy should include the Action Plans</li> <li>Learning to Live Differently: The National Assembly for Wales Sustainable Development Strategy</li> <li>WDA: Wales Biodiversity Audit</li> <li>WSP SE Wales area framework</li> <li>WAP SE Wales A Networked Environmental Region</li> </ul>	<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"> <li>CCW has mapped UKBAP Priority Habitats in Newport</li> <li>RSPB Key Areas for Priority Birds 2007 covers Newport</li> </ul>	<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"> <li>section on biodiversity (pp45) considered deficient as does not set out the</li> </ul>	The nature of the comments suggests that the purpose of the	Key issues table and indicators modified.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		<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"> <li>column 2 of biodiversity (pp45) should remove reference to balance</li> <li>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’.</li> </ul>	<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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
			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 &amp; 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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
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 &amp;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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
			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.

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
			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

Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		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



Rep. No.	Name and Organisation/ Department	Summary of Comment (refer to NCC consultation database for full text)	Response	Action
		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"> <li>Further detail on the 'important species' referenced in the framework</li> <li>analysis for key habitat types with reference to Phase I and any monitoring data available from CCW and/or SEWBRec</li> <li>Historic Landscape Characterisation</li> <li>RoWIPs</li> <li>Accessible Natural Greenspace provision</li> <li>LANDMAP data</li> <li>TAN 8 and supporting information re: locations for development of sustainable energy resources</li> </ul>	<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	<ol style="list-style-type: none"> <li>no further action</li> <li>changes made to</li> </ol>

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"> <li>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.</li> <li>insert WAG targets in respect of CO2 emissions</li> <li>insert indicators specifically linked to BREEAM and additional measures in the WHQS</li> <li>use LANDMAP as a key indicator and ensure that landscape indicators do not relate to biodiversity designations</li> <li>use RHS to identify targets in respect of water quality</li> <li>ensure flood risk includes measures to 'future proof' development and include opportunity for creating/managing habitats for flood alleviation and creating sustainable drainage schemes</li> <li>seek inclusion of reference to the specific provisions now in legislation for setting up Commons Associations in reference to targets and performance indicators</li> <li>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)</li> <li>incorporate BAP targets for specific habitats and species and developing eco-connectivity work for further improving and enhancing the network</li> <li>a robust assessment of the implications of development on contaminated land will need to be included in the HRA</li> <li>include access indicators for non-road modes (e.g. RoWIP targets)</li> <li>cultural heritage should consider natural and built environment</li> <li>reference should be made to specific targets for health and physical activity that are set out in the access to natural greenspace toolkit</li> <li>Economic elements should be cross-referenced to the environmental</li> </ol>	<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"> <li>SAF amended</li> <li>no further action taken</li> <li><i>LANDMAP data unavailable at the time of writing- website technical fault- to be sourced and included at stage B.</i></li> <li>WFD indicators used</li> <li>SAF amended.</li> <li>no further action</li> <li>changes made to key issues table</li> <li><i>BAP targets to be included when available.</i></li> <li>no further action for SA</li> <li>Already included- no further action</li> <li>SAF modified</li> <li><i>Toolkit to be included when available.</i></li> <li><i>This is a</i></li> </ol>

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"> <li>• Climbing Higher</li> <li>• Sports Development Strategy</li> <li>• Play Policy</li> <li>• Going for Gold</li> <li>• Five for Life</li> <li>• GP Exercise Referral</li> </ul>	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	<p>Suggest consideration of the following sources of data</p> <ul style="list-style-type: none"> <li>Sports Council for Wales Biannual Study – adults and children</li> <li>Welsh Health Study</li> </ul>	<p>Suggestions for additional sources of data welcome, although data from the Sports Council for Wales are already included in the appendices.</p> <p>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.</p>	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	<p>Suggest inclusion of the following as additional sustainability issues:</p> <ul style="list-style-type: none"> <li>walking from doorstep to school, work, shops etc.;</li> <li>cycle routes from doorstep to school, work, shops etc.</li> <li>access local community facilities</li> <li>multi-use games areas and informal play spaces</li> <li>meeting spaces</li> </ul>	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	<p>Suggest that the SA/SEA refer to the following:</p> <ul style="list-style-type: none"> <li>new Draft Economic Development Strategy 2008-2011, due to go to Cabinet in November for approval for consultation</li> <li>emerging Tourism Strategy going for review to Scrutiny in October</li> </ul> <p>Noted that the sections on skills and the local economy make no reference to</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	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"> <li>An Energy Strategy for Welsh for LAs</li> </ul>		<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

1. Section 1.1, Para 6, line 6 (p7): Delete "options". Insert "solutions". Reasons: conformity with the Habitats Regulations.
2. 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.
3. Table 3.2: Column 9, p21): Insert reference to the HRA into Row 2 of the "Environment" theme. Reason: Completeness.
4. 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.
5. 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.
6. 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.