

# Draft Sustainability Appraisal Scoping Report and Draft Habitat Regulations Assessment Screening Report - Report of Consultation (December 2018)

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	1
Respondent Name	Helen May
Respondent Organisation	Historic Environment Service (CADW)
Summary of Representation	Section 3.3.6 'A Wales of Vibrant Culture & Thriving Welsh Language' could include reference to how many non-designated historic assets there are in the county.
Requested Change	
LPA Response	Comment noted. The Council do not maintain a record of non-designated historic assets within the County.
Recommendation	No change necessary

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	2
Respondent Name	Helen May
Respondent Organisation	Historic Environment Service
Summary of Representation	Section 3.3.6 could discuss Registered Historic Landscapes in addition to Landscape
Requested Change	
LPA Response	Agree that whilst reference is made in 3.3.6 to the Blaenavon Industrial Landscape World Heritage site, the other two Registered Historic Landscapes which fall partly within the County's boundary are not acknowledged.
Recommendation	Amend 3.3.6 to include reference to the Registered Historic Landscapes of the Gwent Levels and the Lower Wye Valley.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	3
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Note the Sustainability Appraisal (SA) will incorporate the Strategic Environmental Assessment (SEA).
Requested Change	No change requested.
LPA Response	Comment noted.
Recommendation	No change required.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	4
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Satisfied with the scope of the SA report. As indicated in the scoping report, noted that the SA is an iterative and living document, agree with this. This is particularly important when you consider that environmental baseline data is continually evolving as are other plans and programmes. The SA/SEA should therefore be kept under review throughout the LDP preparation.
Requested Change	No change requested.
LPA Response	Comment noted.
Recommendation	No change required.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	5
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Note the review of plans, policies, programmes and strategies and the themes emerging from the review. Further note that the baseline information appears to be thorough and acknowledge the issues identified from an analysis of this data. Further note reference to NRW in gathering information and area statements produced by NRW.
Requested Change	No change requested.
LPA Response	Comment noted.
Recommendation	No change required.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	6
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	The scope and methodologies proposed for the SA seem reasonable.
Requested Change	No change requested.
LPA Response	Comment noted.
Recommendation	No change required.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	7
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Noted that amendments are proposed to the wording of LDP objectives. It appears that the amendments take into account the changes in context since the last/current LDP was produced so that future 'needs' are responded to whilst protecting the best features (e.g. biodiversity, landscape), rather than all features, and development is steered to the most appropriate locations, thereby facilitating the land allocation/development management decision-making processes for the LPA and developers.
Requested Change	No change requested.
LPA Response	Comment noted.
Recommendation	No change required.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	8
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	The SA objectives (within Section 4 Table 3) should provide a robust assessment of environmental impacts from the LDP strategic options. Note the decision aiding questions and possible SA indicators in Table 4 'Proposed SA Framework for the Replacement LDP'.
Requested Change	No change requested.
LPA Response	Comment noted.
Recommendation	No change required.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	9
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	<p>Table 4 'Proposed SA Framework - 4. Placemaking – there is no reference/acknowledgement in the questions or indicators to the natural environment. High quality places are not just created through built structures and hard landscaping. Strategic Green Infrastructure should inform and shape the layout of places (new development should respond to its context) and local green infrastructure should be incorporated into places. Green infrastructure is not only important for maintaining and strengthening green corridors/habitat connectivity for wildlife, it contributes to creating a sense of place, is invaluable to the well-being of communities (visually and as an experience), and, as supported by objective 11, has other functions such as addressing air quality issues in the design of new development. Should Green Infrastructure be included under this objective the Well Being Goals in Table 4 could be expanded to include 'A Resilient Wales'.</p>
Requested Change	<p>Suggest a question is added: 'Will the Replacement LDP ensure that new development retains and is informed by Strategic Green Infrastructure and incorporates local green infrastructure' An indicator could then be added that measures green infrastructure - 'Number of developments completed that maintain and/or incorporate green infrastructure (+)'.</p>
LPA Response	<p>Comment noted. Agree that a decision aiding question with regard to green Infrastructure would be appropriate to include in this section. With regard to the additional SA indicator, agree that this should be included but amended to refer to major developments only rather than all development, as this would be very difficult to monitor.</p>
Recommendation	<p>Include an additional decision aiding question in Table 4 'Proposed SA Framework - 4. Placemaking - 'Will the Replacement LDP ensure that new development retains and is informed by Strategic Green Infrastructure and incorporates local green infrastructure'. An additional indicator to be added - 'Number of major developments completed that maintain and/or incorporate green infrastructure (+)'. To reflect the additional question 'A Resilient Wales' will be added to the list of Well Being Goals addressed by the objective.</p>

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	10
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Table 4 'Proposed SA Framework - 5. Health and Well being – support access to open space and Green Infrastructure, however, it should be acknowledged that Green Infrastructure is not just a 'people' resource but essential for wildlife, the retention of which is used to enable development (e.g. retention of hedgerows and buffer areas for species). Therefore, it is essential that use by people does not compromise the other functions Green Infrastructure supports.
Requested Change	The last question could be amended to read along the lines of 'Will the Replacement LDP enhance opportunities for healthy living and help support more healthy lifestyles through access to open space and Green Infrastructure and prioritised cycling and walking routes (promote active travel) without compromising other functions that open spaces and Green Infrastructure support'.
LPA Response	Comment noted, agree that the additional wording would ensure that all of the functions of Green Infrastructure are taken into account.
Recommendation	Amend the last decision aiding question in Table 4 'Proposed SA Framework - 5. Health and Well being to read: 'Will the Replacement LDP enhance opportunities for healthy living and help support more healthy lifestyles through access to open space and Green Infrastructure and prioritised cycling and walking routes (promote active travel) without compromising other functions that open spaces and Green Infrastructure support'.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	11
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Table 4 'Proposed SA Framework - 8 Biodiversity – it is appreciated that reference is made to designated sites, however, protected species are found beyond these areas.
Requested Change	Consider it would be useful to include an indicator measuring impact on protected species.
LPA Response	Comment noted, it is agreed that development should not impact negatively on protected species, however any such impact would be difficult to monitor through the SA process with the inclusion of an appropriate indicator.
Recommendation	No change required.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	12
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Table 4 'Proposed SA Framework - 8 Biodiversity – recommend the inclusion of a question under the biodiversity objective with regard to Green Infrastructure.
Requested Change	Include the decision aiding question - 'Will the Replacement LDP ensure that new development retains and is informed by Strategic Green Infrastructure and incorporates local green infrastructure'. An indicator could then be added that measures Green Infrastructure - 'Number of developments completed that maintain and/or incorporate green infrastructure (+)'.
LPA Response	Comment noted. Agree that a decision aiding question with regard to green Infrastructure would be appropriate to include in this section. With regard to the additional SA indicator, agree that this should be included but amended to refer to major developments only rather than all development, as this would be very difficult to monitor.
Recommendation	Include an additional decision aiding question in Table 4 'Proposed SA Framework - 4. Placemaking - 'Will the Replacement LDP ensure that new development retains and is informed by Strategic Green Infrastructure and incorporates local green infrastructure'. An additional indicator to be added - 'Number of major developments completed that maintain and/or incorporate green infrastructure (+)'.



Document	Draft Sustainability Appraisal Scoping Report
Representation Number	13
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Table 4 'Proposed SA Framework - 8 Biodiversity – note the useful question under the landscape objective which reads: 'Will the Replacement LDP ensure that new planting can adapt to climate change'. This may be worth integrating into one of the biodiversity questions as well. The reason for this suggestion is to ensure planting for native biodiversity is resilient/futureproofed, as this is important to maintaining biodiversity in the long term, both within and outside of Monmouthshire's best landscapes.
Requested Change	Include decision aiding question - 'Will the replacement LDP support landscaping that makes use of species that will support native biodiversity, ensuring, where possible, that new planting can adapt to climate change'
LPA Response	Comment noted. Agree that it would be useful to include reference within the decision aiding questions to climate change adaptation.
Recommendation	Amend the last decision aiding question in Table 4 'Proposed SA Framework - 8. Biodiversity to read: 'Will the replacement LDP support landscaping that makes use of species that will support native biodiversity, ensuring, where possible, that new planting can adapt to climate change'

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	14
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Table 4 'Proposed SA Framework - 8. Biodiversity – note the proposed question 'Will the Replacement LDP allow people better access to suitable areas of green infrastructure and nature conservation importance to help everyone better understand and value their natural environment'. This question is primarily people focussed. Consider it worth highlighting in the question that other functions of nature conservation areas and Green infrastructure should not be compromised by access.
Requested Change	The proposed question could be amended to read along the lines of 'Will the Replacement LDP allow people better access to suitable areas of green infrastructure and nature conservation importance to help everyone better understand and value their natural environment, without compromising other functions these areas support'.
LPA Response	Comment noted, agree that the additional wording would ensure that other functions of Green Infrastructure are not compromised by access.
Recommendation	Amend the last decision aiding question in Table 4 'Proposed SA Framework - 8. Biodiversity to read: 'Will the Replacement LDP allow people better access to suitable areas of green infrastructure and nature conservation importance to help everyone better understand and value their natural environment, without compromising other functions these areas support'.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	15
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	There is scope to include further indicators under the biodiversity objective. It may be useful to include an indicator that addresses any harm from development to nationally or internationally designated sites.
Requested Change	Include an indicator which monitors harm to nationally or internationally designated sites from permitted development.
LPA Response	Comment noted. There is an indicator under the Biodiversity objective which monitors harm caused by permitted developments to locally designated sites. Harm to internationally and nationally designated sites was previously included within this indicator but the Council were unable to monitor it in a meaningful way. An indicator has been included instead which monitors development permitted within internationally / nationally important nature conservation areas.
Recommendation	No change required.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	16
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Table 4 'Proposed SA Framework - 9 Landscape – would have expected reference to the Brecon Beacons National Park as the LDP could have impacts on the Park's purpose. Consider revisiting the indicator proposed to measure impact on landscape as do not think that this alone is robust enough. Also recommend an indicator to measure adverse impact on the National Park.
Requested Change	Include reference to the Brecon Beacons National Park and an indicator to measure adverse impact on the Park. Give further consideration to the proposed landscape indicators.
LPA Response	Acknowledge that whilst it is stated within 3.3.6 Landscape that there is a need to protect and enhance the landscape assets of the County with particular reference to the Brecon Beacons National Park this has not been included within the SA Framework.
Recommendation	Include a decision aiding question in the Proposed SA Framework - 9 Landscape which states 'Will the Replacement LDP help protect the setting of the Brecon Beacons National Park and the Blaenavon Industrial Landscape World Heritage Site'. With an additional indicator to measure 'The number of developments which negatively affect the setting of the Brecon Beacons National Park or the Blaenavon Industrial Landscape World Heritage Site (-)

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	17
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Table 4 'Proposed SA Framework - 11 Air – note 'nature-based solutions' are discussed. It may be useful to explain what these are.
Requested Change	Explain what 'nature-based solutions' are.
LPA Response	Whilst reference is made to green infrastructure as an example of a nature-based solution, agree it would be useful to give a fuller explanation.
Recommendation	Include a fuller explanation of what nature-based solutions are within the decision aiding questions.

Document	Draft Sustainability Appraisal Scoping Report
Representation Number	18
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Table 4 'Proposed SA Framework - 11 Air – note that this objective is heavily people-based. Would have expected reference in the questions and indicators to nationally and internationally designated areas as a receptor.
Requested Change	One of the decision aiding questions could be amended to 'Will the replacement LDP control the locations of polluting development to ensure it is not located near residential areas or nationally and internationally designated areas and other sites of nature conservation importance'. An additional indicator could read 'Critical loads of pollutants are not exceeded on internationally and nationally designated sites by new development.'
LPA Response	Agree that it would be useful to include reference in the decision aiding question in the SA Framework to nationally and internationally designated areas as well as residential areas. However, in terms of adding the additional indicator, it is unclear how this could be monitored.
Recommendation	The decision aiding question should be amended to read: 'Will the replacement LDP control the locations of polluting development to ensure it is not located near residential areas or nationally and internationally designated areas and other sites of nature conservation importance.' With an additional indicator to read: 'Number of polluting developments permitted close to residential or sites of nature conservation importance. (- )'

Document	Draft Habitats Regulations Assessment Screening Report
Representation Number	19
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Satisfied a 15km buffer zone around the Monmouthshire County Council boundary to identify European sites that 'could possibly be affected' by the revision of the Monmouthshire LDP is appropriate.
Requested Change	No change requested.
LPA Response	Comment noted.
Recommendation	No change required.

Document	Draft Habitats Regulations Assessment Screening Report
Representation Number	20
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	<p>The report lists the European sites to be taken forward for assessment under this plan. The sites included in the report are set out in Section 5. Agree that the sites identified in Table 1, 'European sites identified within Monmouthshire County Council', should be included. However, the report proposes to screen out two sites that fall within the 15km buffer zone, disagree with the conclusion of the sites proposed to be screened out in Table 3. It is proposed that Llangorse lake is screened out. The reason given is this was previously screened out and that 'the replacement LDP is likely to include similar biodiversity policies....' This is not consistent with the precautionary approach fundamental to the Habitats Regulations. Given the replacement LDP has not confirmed biodiversity policies (or other policies) and its strategy, there remains uncertainty as to the likely impacts to site integrity. The site should be assessed on the information and evidence available and not through 'likely' but yet unsecured mechanisms, such as biodiversity policies. There may be further information currently available that would clarify this position, but this information has not been submitted within the assessment.</p>
Requested Change	Advise that Llangorse Lake SAC is not screened out.
LPA Response	Comments noted.
Recommendation	Llangorse Lake SAC to be included in the European sites to be taken forward to the next stage of the HRA process.



Document	Draft Habitats Regulations Assessment Screening Report
Representation Number	21
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	<p>The report lists the European sites to be taken forward for assessment under this plan. The sites included in the report are set out in Section 5. Agree that the sites identified in Table 1, 'European sites identified within Monmouthshire County Council', should be included. However, the report proposes to screen out two sites that fall within the 15km buffer zone, disagree with the conclusion of the sites proposed to be screened out in Table 3. It is proposed that the Aberbargoed Grassland is screened out, on the basis that uncertainty remains as to likely effects for this site, this site should not be screened out until such time that impacts can be ruled out.</p>
Requested Change	Advise that Aberbargoed Grassland is not screened out.
LPA Response	Comments noted.
Recommendation	Aberbargoed Grassland to be included in the European sites to be taken forward to the next stage of the HRA process.

Document	Draft Habitats Regulations Assessment Screening Report
Representation Number	22
Respondent Name	Annabelle Evans
Respondent Organisation	Natural Resources Wales
Summary of Representation	Note Column 5 of the tables in the screening report is entitled 'Qualifying features of the site'. The information in this column is not, for each site, a complete list of the SAC features and may lead to confusion.
Requested Change	Recommend this is addressed either by stating the column does not provide a complete list of qualifying features or, the full information is included (or a link to the full list to the relevant page on the JNCC website).
LPA Response	Comments noted.
Recommendation	Reference to be made to the fact that the tables do not include a complete list of the qualifying features of the sites, with the web link provided to the Joint Nature Conservation Committee website.