

LOCAL DEVELOPMENT PLAN

Strategic Environmental Assessment / Sustainability Appraisal Of the Caerphilly LDP

Draft Scoping Report
July 2006

Statutory Consultee Involvement
Report of Consultation

September 2006



REGENERATION

THE LIVING ENVIRONMENT

EDUCATION FOR LIFE

HEALTH SOCIAL CARE & WELL BEING



Section of Scoping Report**General - Links with Community Strategy****Summary of comment and any Suggested Amendment**

Pleased to note that there has been an effort to incorporate the output of the Community Strategy process into the SA/SEA scoping, particularly the linking of objectives and indicators into the baseline characterisation.

However, there are a number of inconsistencies between the themes identified by the SEA process and the objectives and indicators produced through the Community Strategy. In some cases this may be just an issue of interpretation and a slight alteration of a particular objective or selecting an alternative indicator may resolve the inconsistency. However, in other cases there appears to be a more fundamental mismatch between the theme identified in the baseline characterisation, the definition of the issues and the output of the Community Strategy process, for example, in the Cultural Heritage and Landscape section. This is an important point as the two processes should be compatible and if they are not, the differences will need to be addressed through the review of the Community Strategy

Officer Response

The Draft scoping report has been produced with the involvement of the Council's community planning team. The Community Planning Team have had direct input to the content of the Scoping Report and have advised on many of the indicators and objectives that have been included.

It is not contested that there may be inconsistencies between the two documents. However, the council will seek to identify the inconsistencies and work them out through the LDP process and the community plan review process. In terms of the Scoping Report, and the subsequent assessment process, the report will be the subject of a formal consultation period in April 2007 (as part of the consultation on the preferred strategy for the LDP), following which the Scoping Report will be amended to include changes that will ameliorate inconsistency.

Recommendation

The information be noted, but no change be made to the Scoping report at this time.

Section of Scoping Report

General - Appropriate Assessment: (Conservation (Natural Habitats & c) Regulations 1994.

Summary of comment and any Suggested Amendment

In October 2005, the European Court of Justice ruled that the UK has failed fully to implement the Habitats Directive (92/43/EEC). In order to comply with the ruling, an ‘appropriate assessment’ (as outlined in Article 6(3) and (4) of the Habitats Directive) must be carried out on land-use plans (including development plans) where it is considered that they are likely to have a significant effect on a Natura 2000 site.

The Local Development Plan area includes one Natura 2000 site and lies in proximity to a number of others. We, therefore, welcome the intention of Caerphilly CBC to carry out an appropriate assessment on the Local Development Plan. It should be clearly identified as a separate section within the SEA/SA scoping document and referenced from within the baseline characterisations. We recommend that Caerphilly CBC should contact CCW and the Welsh Assembly Government to discuss the context and methodology for this ‘appropriate assessment’ at the earliest possible opportunity and prior to the completion of the SEA. With this in mind, it is vital that allowance is made for the process within the delivery agreement/SEA timetable. CCW is currently producing draft guidance on the process and we will forward this to you as soon as it has been completed.

Officer Response

It is agreed that an “Appropriate Assessment” of the LDP is required. It is also agreed that the Appropriate Assessment be included within the SEA/SA report. It is intended that the relevant Natura 2000 sites are referenced in this Scoping Report, along with a brief statement advising that an Appropriate Assessment is required. The assessment itself will be included in the Part 2 Environmental Report, in its own section.

Recommendation

1 Paragraph 1.1 be amended as follows:

1.1 This document forms a Scoping Report for the Strategic Environmental Assessment of the emerging Caerphilly Local Development Plan. The Strategic Environmental Assessment (SEA) will be integrated into the Sustainability Appraisal (SA) for the same development plan and will be used to assess the effects of the policies and land allocations of the Local Development Plan will be assessed. This document describes how this is to be undertaken. [In addition, it is also necessary to undertake an Appropriate Assessment of the Plan as it affects Natura 2000 sites both within, and in reasonable proximity to, the county borough.](#) This Scoping Report is primarily a consultation document for the three statutory agencies with environmental responsibilities in Wales, along with other relevant bodies with a sustainability remit or a local interest and has formed the basis of consultations to date.

2 Paragraph B2 be amended as follows:

B2 Figure 15 shows the location of designated sites within the county borough. Aberbargoed Grasslands is the only Special Area of Conservation, a European designation, within the county borough. Further to the SEA Directive, the Directive on the Natural Habitats and of

Wild Fauna and Flora 92/43/EEC (Habitats Directive) requires that an Appropriate Assessment is undertaken for 'any plan or project, alone or in combination with other plans or projects, that is likely to have a significant effect on any [Natura 2000 site](#)'; [in this instance the Aberbargoed Grasslands \(as it lies within the county borough\) and three sites that lie in close proximity to the county borough and may be affected by the LDP policies, i.e the Severn Estuary, Castell Coch Beech Woods, Cwm Clydach Woodlands.](#) The Appropriate Assessment (AA) should concentrate on any implications for the site in view of the site's conservation objectives. It is intended to include the required AA for Aberbargoed within the Sustainability Appraisal. The county borough also has 10 nationally important sites, Sites of Special Scientific Interest of which 6 5 have been designated for their biological interest and the remaining 4 5 of geological interest. There are also 4 local nature reserves and 188 sites of importance for conservation (SINCs) within the county borough. These designations identify areas which are of local conservation interest and in some cases contain habitats and species of national significance. These SINCs, and other sites, are currently being reviewed as part of the LDP process. There are also a number of other 'designated' nature reserves ranging from sites operated by Wildlife Trusts to private businesses and schools.

Section of Scoping Report

Introduction – Para. 1.1

Summary of comment and any Suggested Amendment

The aim of SEA is to provide a high level of environmental protection, integrate environmental concerns into plans/programme and to promote sustainable development. This scoping report only states the aim of ‘feeding into the sustainability appraisal’; within a joint SA/SEA process, care must be taken to ensure that the requirements of the SEA Directive and Regulations are met in full (in terms of process and content)

Officer Response

The SEA Directive states that *“The objective of this 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 and programmes with a view to promoting sustainable development,”* (Para. 20)

This reference is actually made in Paragraph 2.2 in the context of setting the background for SEA and SA. Consequently it is not considered appropriate to reiterate it in Paragraph 1.1. However, it would be useful to rephrase the sentence so as to ensure clarity.

Recommendation

Paragraph 1.1 be amended as follows:

- 1.1 This document forms a Scoping Report for the Strategic Environmental Assessment of the emerging Caerphilly Local Development Plan. The Strategic Environmental Assessment (SEA) will ~~feed~~ be integrated into the Sustainability Appraisal (SA) for the same development plan, ~~against which~~ and will be used to assess the effects of the policies and land allocations of the Local Development Plan ~~will be assessed~~. This document describes how this is to be undertaken. In addition, it is also necessary to undertake an Appropriate Assessment of the Plan as it affects Natura 2000 sites both within, and in reasonable proximity to, the county borough. This Scoping Report is primarily a consultation document for the three statutory agencies with environmental responsibilities in Wales, along with other relevant bodies with a sustainability remit or a local interest and has formed the basis of consultations to date.

Section of Scoping Report

Background – Para. 2.1

Summary of comment and any Suggested Amendment

The reference to guidance on SEA of UDPs needs to be replaced with current guidance, ie forthcoming Welsh Assembly Government “Local Development Plan Manual” and EU guidance “Implementation of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment”

Officer Response

Over the past three or four years a large number of guidance documents, both statutory (produced by member states) and non-statutory (advisory), have been produced. Paragraph 2.1 seeks to expand on the issue that, whilst the Directive applies across member states, it is the own member states that provide the “flesh to the bones” in applying the directive. Consequently it is considered inappropriate to include reference to a European level piece of guidance at this point.

In terms of the relevant Welsh Guidance, the reference should be updated to the LDP Manual.

Recommendation

Paragraph 2.1 be amended as follows:

- 2.1 The European Union passed a Directive in 2001 (2001/42/EC) on the assessment of the affects of certain plans and programmes on the environment. This Directive commonly known as the Strategic Environmental Assessment Directive has been interpreted by the UK and Welsh Governments to meet national needs. In Wales the Assembly Government’s publication ‘The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004’, referred to hereafter as the Regulations, sets out the Welsh perspective. As a further aid to interpreting these Regulations the Welsh Assembly Government has also published ~~Strategic Environmental Assessment (SEA) of Unitary Development Plans – Interim Good Practice Guide (2004)~~ [Local Development Manual \(june 2006\)](#) as an aid to clarification and for the production of land use plans by Local Authorities.

Section of Scoping Report

Background – Para. 2.3

Summary of comment and any Suggested Amendment

Second sentence – the “interconnectivity” between topics is a requirement of the SEA process not just a “consideration” (Annex 1(f))

Officer Response

Annex 1, criterion (f) of the SEA Directive states:

“(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;”

It is agreed that the interconnectivity between topics is a requirement.

Recommendation

Paragraph 2.3 be amended as follows:

2.3 All of these issues should be included within any plan’s assessment. These are not intended to be exclusive and flexibility is allowed with regard to local circumstance, however the interconnectivity between the topics is ~~also a consideration~~ a requirement. For the purposes of this scoping report four of the topics listed above, Biodiversity and Flora and Fauna and Population and Human Health have been combined into two topics.

Section of Scoping Report

Background – Para. 2.4

Summary of comment and any Suggested Amendment

In order to comply with the October 2005 European Court of Justice judgement that the UK has failed fully to implement the Habitats Directive (92/43/EEC), appropriate assessment (as outlined in Article 6(3) and (4) of the Habitats Directive) must be carried out on land-use plans where it is considered that they are likely to have a significant effect on a Natura 2000 site. This should be incorporated both here and in other relevant sections of the scoping document (particularly the methodology section, plans and policies section and process timetable).

Officer Response

It is agreed that appropriate assessment needs to be included in the scoping report. However, including multiple references within the document will only lead to the document becoming unwieldy and potentially confusing. In addition there are many cross-cutting issues that could apply to a range of the topic areas and, again, including these across the board would unnecessarily complicate and enlarge the scoping report. Consequently it is not proposed to put multiple references within the document as a matter of principle.

In respect of appropriate assessment, it is already intended to include a reference in the Introduction. It is also agreed that reference should also be made in the methodology chapter to outline the process that will be undertaken.

It is not intended to make any further references over and above those outlined above.

Recommendation

A new paragraph be included at the end of Chapter 4, as follows:

4.15 The Natura 2000 network, provided for in Article 3 of the Habitats Directive, are the main sites of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community and consist of Special Areas of Conservation (SAC's), Special Protection Areas (SPA's) and Offshore Marine Sites (OMS). In an effort to ensure such sites are fully considered as part of the Plan making process the Habitat Regulations require that an Appropriate Assessment (AA) is undertaken for those plans that are likely to have a significant effect on these sites.

4.16 It is recommended in 'Planning for the Protection of European Sites: Appropriate Assessment' 2006, Dept for Communities and Local Government that any AA should be undertaken in conjunction with the Sustainability Appraisal so they can inform each other.

4.17 As part of this process it will be necessary to identify any sites that maybe effected by proposals, including those beyond the county boundary. The characteristics of these sites and their conservation objectives must be considered as must the effects of other relevant plans and projects on these sites.

- 4.18 Following the evidence gathering, later stages of the AA require options and effects to be assessed and mitigation methods and alternatives analysed. It is the intention to include the AA within the SEA/SA document and consult on the AA findings and publish at the same stages as for the SEA/SA.
- 4.19 Caerphilly has one European designated sites within the County Borough, i.e. Aberbargoed Grasslands. This site is an area of grasslands of importance in particular for the Molinea Meadows and Marsh Fritillary butterfly. The area is surrounded by urban development and is under threat from a lack of management. CCBC have recently taken a long term lease on this site and with the assistance of grant aid employed a ranger and farm hand to help manage the site. This is the only European designated site within the County borough and is the site most likely to be significantly effected by the land use plan. Effects may arise from development adjacent to the site resulting in additional use, and in particular anti social use, on the site. Potential pollution from the adjacent industrial estate and increased road use are also potentially a threat but it is the effects of global warming that potentially pose the largest problem as the grasslands are dependent on being wet.
- 4.20 CCW have identified three other sites, which lie outside the County which are also of importance and at risk of potential impact from the LDP. First of these sites is the Bristol Channel Marine SPA and possible SAC, which lies to the south of the county borough. It is also a RAMSAR site. This site is important because the county borough's water courses discharge into this body of water. The area is particularly important for a variety of birds and migratory fish and contains important habitats such as sand and mudflats, shingle and rocky shoreline, reefs and saltmarsh. As such issues relating to water, erosion and pollution are important. The second site is The Cardiff Beech Woods to the south west of the County borough, in the Cardiff and Rhondda Cynon Taff areas. This site is important because they are of a unique gene pool Tilio – Acerion and are at the western limit of their range. The main threats to these are seen to come from increased traffic pollution, increased use and possibly challenges from destructive wildlife. As is the case for the majority of natural sites global environmental changes pose a potentially massive threat. The third site lies at the opposite end of the County borough, to the north east, namely Cwm Clydach Woodlands. This site is an upland area of beech forest of the Asperulo – Fagetum species which is at its north western range. The prevailing south westerly winds make this area potentially vulnerable to air borne pollution. These will be investigated in more detail at the options stage of the plan preparation process.

Section of Scoping Report**Chapter 3 – Para. 3.1****Summary of comment and any Suggested Amendment**

The reference to “Guidance for Land use planning” is unclear – is the reference to the WAG LDP manual or specific SEA guidance?

Officer Response

This reference relates to the requirements of the SEA Directive and more specifically to “The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004”. The reference should be amended accordingly.

Recommendation

Paragraph 3.1 be reworded as follows:

- 3.1 Environmental assessment is already an established practice for many types of plan and programme but specific requirements and approaches vary. ~~The guidance for land use planning~~ [The SEA Directive, as implemented by The Environmental Assessment of Plans and Programmes \(Wales\) Regulations 2004](#), however brings a new emphasis in the following areas:

Section of Scoping Report**Chapter 4 – Para. 4.8****Summary of comment and any Suggested Amendment**

The strategic options need to take account of the feedback from the consultation process.

Officer Response

Part of the process in drafting the Part 1 of the SEA/SA is to assess the preferred LDP strategy and its options. As part of the process of considering a preferred option for the LDP, workshops have been held with all LDP management groups, including the Sustainability Group, for their input into the emerging strategy options. Once determined by Council the preferred strategy, and the various options, will be the subject of assessment by the SEA/SA. Throughout this process the preferred strategy will take account of the feedback from all of its sources.

However, how the LDP takes account of the information and the process that it uses to influence the content and nature of the plan is an LDP process, not an SEA/SA process. Consequently it is not considered necessary to make specific reference about this issue at this point

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report

Chapter 4

Summary of comment and any Suggested Amendment

The proposed methodology for analysing and predicting the impacts of the LDP policies on the environment, as well as the development of reasonable alternatives, as set out in chapter 4, would appear sensible and appropriate.

Officer Response

The support for the chapter is welcomed

Recommendation

The support for the chapter be noted.

Section of Scoping Report**Chapter 4 – Para. 4.11****Summary of comment and any Suggested Amendment**

The reference to mitigation for significant impacts needs to be strengthened from “where possible” to “should” or “shall” (to properly reflect the requirements of Annex 1 (g) of the Directive) and be clearly linked to the consideration of alternatives (section 4.13)

Officer Response

The reference needs to be made more positively, and the deletion of the term “where appropriate” should be deleted. It should be noted that the Directive actually provides for mitigation that ‘. . . as fully as possible offset any significant adverse effects . . .’ implying an element in flexibility, rather than an absolute requirement. The sentence should be reworded to reflect the directive.

Recommendation

Paragraph 4.11 be reworded as follows:

- Identification of any significant impacts the LDP may have on sustainability and ~~where possible ways of mitigating on for these~~ that seeks to offset, as fully as possible, any significant adverse effects.

Section of Scoping Report**Chapter 5 – Para. 5.2****Summary of comment and any Suggested Amendment**

Reference to CCW expertise should also include “access to the countryside, coast and urban green space”.

Officer Response

This is agreed.

Recommendation

Paragraph 5.2 be amended as follows:

- 5.2 With the integrated SEA and SA approach being adopted by Caerphilly there are other bodies that will have a direct impact on the plan that may not necessarily be considered as part of the SEA regulations. In order to address this and secure a wide variety of views a Steering Group, hereafter referred to as the Sustainability Group, has been established to assist in the development and guidance of the preparation of the integrated appraisal. In terms of the three statutory consultees the CCW have expertise within the fields of biodiversity and landscape [as well as access to the countryside, coast and urban green space](#). Cadw have expertise in cultural heritage including archaeology and architecture. The EA’s expertise lies in air quality, climatic factors, soil and water. The early involvement of these bodies allowed the identification of key issues and the most appropriate organisations needed to create the Steering Group. The involvement of these bodies is required by the SEA Directive, which is particularly pertinent as these organisations are regulatory bodies and hold much of the information required as part of the development of the appraisals

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Population and Human Health - Omission

Summary of comment and any Suggested Amendment

Recreation and the positive effect it can have on human health has not been mentioned in this section as an issue although reference is made about access to leisure facilities as an objective and there is an indicator on green space. Green spaces can enhance quality of life and provide places for people to exercise, thus generally improving human health. Research shows that nearby natural spaces can benefit health and reduce social problems in the local community. Natural surroundings reduce stress and encourage people to take up outdoor activities such as walking, cycling or watersports, which keep us fit and healthy by improving local environments.

Is it possible to include data on people accessing the countryside, green spaces and water recreational activities? Or a map showing where the main “outdoor” leisure facilities/activities take place?

Officer Response

Agree. Include reference to the benefits to both physical and mental health that recreation and open spaces can provide. No comprehensive data is held on visitors to recreational sites as identified however the inclusion of a map showing key recreational receptors can be included.

Recommendation

A new paragraph be included as follows:

P17 Over 80% of the County borough is countryside that forms an important visual and recreational resource for both residents and visitors. There are also a number of formal Urban and Country Parks in addition to areas of public open space that can be found in all settlements. These green spaces and supporting infrastructure eg footpaths and cycleways considerably enhance the quality of life of residents. The main ‘green’ recreational areas are shown on the Map below and the protection and enhancement of these will be of considerable benefit in mental and physical health terms.

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Population and Human Health - Omission

Summary of comment and any Suggested Amendment

Flooding can cause both physical and mental health problems. I appreciate that flooding is included as an issue in the “Water” section but it should be noted somewhere about the human health impacts of flooding.

The human health aspect of flooding should be referenced in this section

Officer Response

As stated flooding is included within the Water section and it is not considered that the health aspect, in relation to other health issues, is significant to warrant a reference outside the water Chapter.

Recommendation

Paragraph W2 be amended as follows:

W2 Due to the county borough’s westerly location and its mountainous nature in addition to proximity to the sea, the catchments receive a high annual average rainfall of slightly short of 1400mm. Despite the catchment’s altitude little of this falls as snow. Although the rainfall is throughout the year the thin sandy soils, the sandstone and the rocks of the coal measures do not retain large quantities of water in storage and therefore provides little base flow support to the water courses. Consequently the main rivers are ‘flashy’ in nature, with quite rapidly diminishing flows during dry periods, very rapid rises in river levels during heavy storms and periodic flooding during the winter months. The base flows of these rivers has however reduced since the closure of the coal mines which pumped considerable amounts of underground water into the main river channels. The average daily flow of the River Rhymney as it flows into the estuary is 5.95 cubic metres per second, whilst during a dry summer this is reduced to approximately .6 of a cubic metre per second. Figure 11, below, indicates the parts of the county borough designated as ‘flood plain’, categories C1 and C2 as defined by the Environment Agency. Flooding may become more frequent as a result of global warming and many commercial and residential properties within the county borough fall within the area at risk of flooding from a once in 100 year occurrence. The Environment Agency seek to ensure that developments should in most instances not be located on flood plains and when practicable should provide permeable surfaces and a wider sustainable urban drainage system in order to reduce flash run off and help diffuse pollution. [In addition to the above there are also potential health implications associated with pollution resulting from flooding.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Population and Human Health - Omission****Summary of comment and any Suggested Amendment**

The Environment Agency’s “Better environment healthier people” gives good examples of how the environment impacts on people’s health and what we can do to ameliorate matters, along with examples of how a good, clean environment can have health, social and economic benefits

Pollution related human health risks should be referenced in this section.

Officer Response

It is felt that the issue is identified. Include the publication within the background documents.

Recommendation

Appendix 6 be modified by the inclusion of the following reference:

Population and Human Health

[A29 Better Environment Healthier People – Environment Agency](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Population and Human Health – Para. P13****Summary of comment and any Suggested Amendment**

Given that Caerphilly has been identified as an “overspill” area for Cardiff more information is required on the potential implications for:

- Transport,
- Housing,
- Air quality,
- Aggregates demand,
- Climate change

There will also be a need to consider and assess the future implications of Cardiff Land use plans on Caerphilly (this will also apply to other adjacent authorities where there are potential implications for Caerphilly)

Officer Response

This issue is being considered through the LDP as part of the process of identifying a strategy for the plan. No decisions on the strategy for the LDP have yet been made, and Caerphilly’s role in the future of the county borough and the region has yet to be determined.

The role of the SEA/SA is to assess such issues where they form part of the LDP strategy, and not prejudge any decision that may arise from the LDP process. It is not the role of the SEA/SA to consider every scenario that could form part of the LDP Strategy. The issue has been flagged up within the Baseline Characterisation, but it is not intended to include the implications of this issue, as if it were to form part of the LDP strategy it would be the subject of formal SEA/SA assessment at the due time.

Recommendation

No change be made in respect of this comment.

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Population and Human Health – Issue 12

Summary of comment and any Suggested Amendment

Need to clarify what is meant by “possible rural issue also”

Officer Response

This reference relates to the spatial distribution that may exist between affordability of housing, particularly in the Caerphilly basin, as against affordability of rural housing in the north of the county borough. They are, in essence different issues deriving from the same source, i.e. high house prices. Being separate issues it makes more sense to split them into two distinct issues for this purpose.

Recommendation

The issues be amended as follows:

1. Whilst the population has remained relatively stable it has increased in the south and decreased in the north of the county borough.
2. Declining Household size.
3. There is an age demographic shift, the numbers of elderly people are increasing whilst the young are decreasing.
4. Premature death rates are high particularly in the north of the borough.
5. Caerphilly borough has high death rates from heart attack and chronic pulmonary disease.
6. Obesity levels are the worst in Wales at 20%.
7. Educational qualifications in the county borough are amongst the worst in Wales.
8. There is a large proportion of older properties (pre-1919) which tends to be the poorest stock.
9. There is an over supply affordable of housing in the north of the county borough and an under supply in the south.
10. There are large numbers of permanently sick/disabled members of the workforce.
11. There are large areas of indicated multiple deprivation within the county borough which contains 13 of the top 100 wards within Wales.
12. Affordability of homes ~~and possibly a rural issue also.~~
13. [Rural Housing in the north of the County Borough](#)
14. Imbalance between skills and training and local jobs.
15. Sectoral dependency of the economy.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Population and Human Health – Additional Issue****Summary of comment and any Suggested Amendment**

It would be appropriate to include issues relating to commuting/travel to work distances, use of public transport/cycling/walking, transport links and inward/outward migration. The SEA framework should include objectives and criteria to encourage the design and layout of development that minimises the need to travel

Officer Response

The Baseline Characterisation is intended to provide a broad view of the issues that are currently important within the County Borough. It is not intended that the Baseline Characterisation provide detailed analysis of these issues, other than to identify, where appropriate, factors that contribute toward the current status in respect of that issue.

Whilst these issues are pertinent to the SEA/SA, these issues are considered under the guise of transport in the Climatic factors Baseline Characterisation. Indicator (d) relates to public transport useage, Indicator (e) relates to average commuting time whilst the baseline characterisation in Population and Human Health has reviewed the population stability in paragraph P2. It is not considered appropriate to include more detail on these issues.

Recommendation

No amendment be made in respect of this comment.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Objectives and Indicators - General****Summary of comment and any Suggested Amendment**

The objectives and indicators do not adequately cover a number of the issues (which appear to be taken from the Community Strategy). There is a need to ensure that the identified issue is correctly defined by the chosen objective and covered by the monitoring indicator.

Officer Response

The issues list identified at the end of the Background statement identifies the relevant issues in respect of that topic area. It is not intended to identify an objective and indicators for each of these issues as to do so would result in a very large number of objectives and an even larger number of indicators, which would make the assessment process extremely complicated and onerous. In addition it may not be possible to obtain relevant, up-to-date and readily reviewed data upon which to base an objective or Indicator. Further to this there are many issues that cannot be monitored for various reasons.

Consequently the most relevant issues, that are capable of being monitored, have been included as Objectives and Indicators.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Objectives and Indicators – Population and Human Health****Summary of comment and any Suggested Amendment**

Issue 11 – objective O, should refer to the guidelines on access to green space and the Green Space Toolkit.

Officer Response

The Greenspace Toolkit is a new method of assessing accessibility to natural greenspace within urban areas. The Toolkit is based upon a model of provision entitled Accessible Natural Greenspace Standards (ANGSt). The Council are in the process of commencing work in respect of the Green Space Toolkit and the ANGSt model for the County Borough, which will eventually feed into the LDP. Given that this work is being undertaken it is appropriate that this indicator reflects a relevant standard from the ANGSt model.

Recommendation

Indicator O (renumbered (z)) be reworded as follows:

- (z) ~~Percentage of properties within 200 metres of public green space.~~ [Percentage of the population with 2 hectares or more of natural greenspace in accordance with the CCW model for accessible natural greenspace \(Greenspace Toolkit\).](#)

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Air Pollution – A1

Summary of comment and any Suggested Amendment

Needs to cross reference with P13 and potential implications of Cardiff commuting

Officer Response

The issue of cross referencing has been considered from the outset in drafting the Scoping Report. There are many issues that relate across a number of the topic areas. Cross referencing between them could lead to a significant level of duplication and over-complicate the document. Consequently it was decided that issues would be addressed in one topic area only, without cross referencing. This stance needs to be stated in the methodology to the Scoping Report to clarify the situation.

It is agreed that the potential implications of Cardiff commuting should be included at this point.

Recommendation

Paragraph A1 be reworded as follows:

A1 Historically the major air pollution problem has been associated with the burning of sulphur containing fossil fuels such as coal for heating and industrial purposes leading to smoke and sulphur dioxide. The major threat to clean air is now posed by traffic emissions. Petrol and diesel engines emit a wide variety of pollutants, principally carbon monoxide, oxide of nitrogen, volatile organic compounds and particulates which have an increasing impact on, particularly, urban air quality. Whilst these are generally associated with the urban areas, ozone at ground level tends to be more associated with rural areas and over 80% of the County borough is rural in nature and as such the potential for ozone to be problematic exists although no monitoring information is currently available. Acid deposition, primarily through acid rain, can also take place at long distances from the source of the pollution. Generally industrial and heating pollutant sources, together with their impact on air quality, tend to be either in a steady state or improving over time. However, traffic generated pollution, which in the UK accounts for approximately 50% of nitrogen dioxide emissions and 90% of carbon monoxide pollution are worsening. [In particular the issue of commuter traffic to Cardiff could have increasingly significant effects on the environment of the county borough.](#) In addition to pollution related to combustion, pollutants are often contained within building materials.

And a new paragraph be included in methodology as follows:

[6.6 It should be noted that many of the issues raised in the characterisation relate to more than one topic area. If all the issues were reported in all relevant areas it would result in a significant level of duplication and reiteration that could lead to the document becoming unwieldy and difficult to comprehend. More seriously though, it could lead to an issue resulting in Indicators in more than one topic area, which could unbalance the assessment of the plan. Consequently it is has been decided that issues are covered only once, in a specific topic area.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Air Pollution – A4****Summary of comment and any Suggested Amendment**

Nitrogen oxides and low-level ozone can also have adverse effects on vegetation

Officer Response

This is agreed and the paragraph should be reworded to reflect this.

Recommendation

Paragraph A4 be reworded as follows:

- A4 Whilst levels of air borne pollution may be relatively low within the county borough, with air quality meeting National Air Quality Standards (NASQ) objectives there are however large numbers of the population with respiratory problems, in part caused by the coal mining industry and maybe more susceptible to changes. Also a large number of sites of interest for nature conservation that are water reliant and may be particularly sensitive to acid rain. [Nitrogen oxides and low-level ozone can also have adverse effects on vegetation.](#) The housing stock of the county borough has a large percentage of older properties that may not have energy efficient heating systems. The number of properties burning direct solid fuel has however dropped considerably in the past 20 years as people have moved away from coal fires to primarily gas central heating. Due to the linear nature of many settlements and property type being terraced this can result in traffic-generated pollution being concentrated literally on the doorstep for many residents.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Air Pollution – A6****Summary of comment and any Suggested Amendment**

Should cross-reference to measures of tranquillity (CPRW/CPRE)

Officer Response

The Baseline Characterisation is intended to provide a broad view of the issues that are currently important within the County Borough. It is not intended that the Baseline Characterisation provide detailed analysis of these issues, other than to identify, where appropriate, factors that contribute toward the current status in respect of that issue. In addition it is not intended to provide measures for each issue as this can unduly complicate and enlarge the document.

However, it is considered appropriate to include a reference to the documents which contain the measures in the reference list in Appendix 6.

Recommendation

Appendix 6 be amended by the inclusion of the following reference under Air Pollution

B9 [Tranquillity: http://www.cpre.org.uk/resources/pub/pdfs/landscape/tranquillity/mapping-tranquillity.pdf](http://www.cpre.org.uk/resources/pub/pdfs/landscape/tranquillity/mapping-tranquillity.pdf)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Air Pollution – A7****Summary of comment and any Suggested Amendment**

Should cross-reference to measures of light pollution or “night blight” (CPRE)

Officer Response

The Baseline Characterisation is intended to provide a broad view of the issues that are currently important within the County Borough. It is not intended that the Baseline Characterisation provide detailed analysis of these issues, other than to identify, where appropriate, factors that contribute toward the current status in respect of that issue. In addition it is not intended to provide measures for each issue as this can unduly complicate and enlarge the document.

However, it is considered appropriate to include a reference to the documents which contain the measures in the reference list in Appendix 6.

Recommendation

Appendix 6 be amended by the inclusion of the following reference under Air Pollution

B10 <http://www.cpre.org.uk/resources/pub/pdfs/landscape/light-pollution/night-blight-report-32pp.pdf>

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Air Pollution - Issues****Summary of comment and any Suggested Amendment**

Issues which can help to reduce air pollution such as encouraging homeworking, (leading to fewer car journeys), the development of clean, green technologies and use of video conferencing should be included in the issues section

Officer Response

Agree. Include reference to the potential of homeworking, development and further use of green technologies and video conferencing to reduce air pollution.

Recommendation

Paragraph A5 be amended as follows:

A5 Car ownership levels of some 71% are below national levels and when this is coupled to employment opportunities beyond the county borough there is the potential to significantly increase private vehicle usage that would result in an increase in air borne pollution. [Increased homeworking and the development and use of further green technologies including video conferencing have the ability to reduce air pollution, primarily through a reduction in travelling.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Air Pollution – Issue 10****Summary of comment and any Suggested Amendment**

Should cross-reference to measures of tranquillity (CPRW/CPRE)

Officer Response

The Baseline Characterisation is intended to provide a broad view of the issues that are currently important within the County Borough. It is not intended that the Baseline Characterisation provide detailed analysis of these issues, other than to identify, where appropriate, factors that contribute toward the current status in respect of that issue. In addition it is not intended to provide measures for each issue as this can unduly complicate and enlarge the document.

However, it is considered appropriate to include a reference to the documents which contain the measures in the reference list in Appendix 6.

Recommendation

B9 [Tranquillity: http://www.cpre.org.uk/resources/pub/pdfs/landscape/tranquillity/mapping-tranquillity.pdf](http://www.cpre.org.uk/resources/pub/pdfs/landscape/tranquillity/mapping-tranquillity.pdf)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Air Pollution – Objectives and Indicators - General****Summary of comment and any Suggested Amendment**

The indicators are all “negative”, should consider additional objectives to cover all the issues such as ones related to tranquillity and light pollution and specific pollutants such as NOx etc..

Officer Response

It is agreed that the indicators relate to occasions or instances where standards are failed. However the fact remains that the indicators will highlight trends that occur over time. In identifying the indicators it was acknowledged that they were indeed negative in nature. However the numbers of negative instances are low, whilst the positive side would throw up large numbers of instances. Purely for the sake of being comprehensible the negative option was taken. It should also be noted that a negative indicator does not lead to a negative outcome, rather a decrease in a negative indicator is a positive impact.

The Authority does not monitor Nox, tranquillity or light pollution. Consequently it is not possible to use them as indicators if there is not a known baseline level to start from and there is no monitoring to consider against the baseline. Consequently, it is not possible to include these, and other potential, indicators in the scoping report.

Whilst these issues are not monitored specifically, these considerations could be included within the overall objective which would highlight them as issues for consideration.

Recommendation

The objective for Air Quality be reworded as follows:

To reduce air, ~~and~~ noise, light and odour pollution and ensure air quality improves.

Section of Scoping Report**Chapter 6 – Cultural Heritage and Landscape****Summary of comment and any Suggested Amendment**

Turning to the Cultural Heritage and Landscape section at page 26, I would agree that the combining of these two SEA topics is helpful. The background paragraphs are interesting, if quite long and descriptive, but I think the way that the cultural aspects are drawn out is particularly valuable. The background chapters on heritage that follow also help to establish the background and I am pleased to see the threats to the Gelligaer Common registered historic landscape now highlighted.

Officer Response

The support for the Chapter is welcomed

Recommendation

The support for the Chapter be noted

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Cultural Heritage and Landscape – CH7 to CH12****Summary of comment and any Suggested Amendment**

There is no reference to traditional field boundaries (walls, hedges etc.) no mention of common land and more recent cultural/heritage landscape features such as reservoirs or forestry.

Officer Response

Paragraph CH15 includes references to field boundaries, common land and woodland and it is not considered appropriate to reiterate them in these paragraphs. The other factors are not referenced in the report and should be included.

Recommendation

Paragraph CH13 be amended as follows:

CH13 The landscape of the county borough is determined by mans influence upon it and the use that the land is put to. The county borough's landscape offers a rich variety of forms and character which are lived and worked in [including features such as hedgerows, stone walling, and more recent features such as reservoirs and forestries](#). Of the land area some 80% can be classified as rural. Approximately two thirds of this 'rural' land is under agriculture, with the majority of the remainder being woodlands or land despoiled by industry. There are some 300 active farms within the county borough

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Cultural Heritage and Landscape – CH13****Summary of comment and any Suggested Amendment**

No reference to forestry or common land in public ownership – this must be included.

Officer Response

The report includes a map of common land and woodland (figure 9) and reference is made to both in paragraph CH15. It would be appropriate to identify that such areas.

Recommendation

Paragraph CH15 be amended as follows:

CH15 The density and locations of settlements within the valleys has a marked effect upon the character of the county borough. Where the landscape form results in development being concentrated on the valley floor and lower valley sides, this has the result of interrupting views to the higher valley slopes and ridge lines which has a consequent effect upon perceived values. These elevated areas do however provide a rural backdrop visible from most streets and areas within towns of the county borough. There are numerous land reclamation schemes and unreclaimed tips on the valley sides and hilltops of the county borough which seem incongruous into the wider landscape setting. The majority of the county borough does however remain open. These open areas and agricultural land practices results in a diversity of landscape patterns which alone do not constitute primary landscape elements, but with other elements contribute to the overall landscape character. The forms and types of field boundaries, woodland coppices and open commons reflect a variation in land ownership and management regimes that contribute to the rich landscape tapestry [with commons and woodlands in public ownership being accessible by the general public](#). The urban fringe, where the built form and open countryside meet, is in many ways the defining quality and character of parts of the county boroughs landscape when considered in visual and sensory terms.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Cultural Heritage and Landscape – CH14****Summary of comment and any Suggested Amendment**

Map should distinguish between ancient woodland and other forms of woodland/agri-forestry; there are different issues relating to conservation, access, recreation and the landscape impacts of these two different woodland classifications.

Officer Response

Whilst it is accepted that woodland/forestry has many roles and uses within the landscape. However the Baseline Characterisation is intended to provide a broad view of the issues that are currently important within the County Borough, without going into excessive detail. In general the overall woodland asset is the issue, rather than the varying roles it plays in the landscape. Consequently it is not considered appropriate to include additional detail in the Baseline Characterisation.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Cultural Heritage and Landscape – CH15 to CH17

Summary of comment and any Suggested Amendment

There is no mention of windfarm development, although there are no TAN 8 Strategic search areas within the Borough there is potential for small (<5MW) and Medium (5-25 MW) developments, particularly along the northern margins and ridge lines, and the potential implications of such developments should be considered and cross referenced to the material assets and climate change sections.

Officer Response

Windfarm development and its potential impact upon the environment of the county borough is a significant issue and should be included in the Scoping Report. It is more appropriate, however, that reference to windfarm development be made in the Climatic Factors Chapter.

The issue of cross referencing has been considered from the outset in drafting the Scoping Report. There are many issues that relate across a number of the topic areas. Cross referencing between them could lead to a significant level of duplication and over-complicate the document. Consequently it was decided that issues would be addressed in one topic area only, without cross referencing. This stance needs to be stated in the methodology to the Scoping Report to clarify the situation.

Recommendation

A new paragraph be included in methodology as follows:

6.6 It should be noted that many of the issues raised in the characterisation relate to more than one topic area. If all the issues were reported in all relevant areas it would result in a significant level of duplication and reiteration that could lead to the document becoming unwieldy and difficult to comprehend. More seriously though, it could lead to an issue resulting in Indicators in more than one topic area, which could unbalance the assessment of the plan. Consequently it is has been decided that issues are covered only once, in a specific topic area.

And a new paragraph be included in the Baseline Characterisation of the Climatic Factors topic as follows:

CF4 Windfarm generated electricity is, potentially, the most likely form that renewable energy generation will take over the LDP period. Windfarms are not without their issues and impacts upon landscape, ecology and the environment generally are major considerations in considering such uses. TAN 8 – Planning for Renewable Energy identifies seven areas (Strategic Search Areas) where large scale windfarms should be located. None of the identified sites are within the Caerphilly area. Without such a site the authority could be subject to smaller scale proposals for wind generation focussing on small scale local need. Whilst the smaller size of such facilities may reduce the overall impact, small scale provision is still likely to have significant impacts at a local scale.

Section of Scoping Report

Chapter 6 – Cultural Heritage and Landscape – Additional Issues

Summary of comment and any Suggested Amendment

You might wish to consider further whether the following three specific issues warrant special mention in the report:

- The sustainable use of Caerphilly Castle and its role in the promotion of the town
- The need for a policy or planning brief for Ruperra Castle (scheduled and listed) and its registered Park and Garden and protect it from inappropriate, piecemeal, development.
- Protection and sustainable reuse of surviving industrial heritage (Bryngwyn Engine House, Penallta Colliery etc).

Officer Response

Caerphilly Castle has significant tourism and promotional potential. This should be reflected in the baseline Characterisation text.

Ruperra Castle has been the subject of planning application for rehabilitation, conversion and new build since 2002. Whilst the application has recently been withdrawn, the proposals have raised a number of issues that need to be addressed. It is important that Ruperra castle is not the subject of inappropriate or damaging development. Whilst the provision of supplementary planning guidance on this issue may be desirable, the timescales for the production of such SPG may be precluded by the submission and determination of a planning application. Therefore the requirement for SPG cannot, with certainty, be guaranteed to be produced and therefore should not be included in the Scoping Report. It would be pertinent, however, to include reference to the issues at Ruperra Castle in the baseline characterisation.

The protection and sustainable reuse of surviving industrial heritage is an important issue. However the planning system can only realistically seek to encourage such protection and reuse. There are policies that provide protection for important buildings but, generally, the development plan is restricted in its powers to enforce this issue. The overall issue, however, is worthy of inclusion in the baseline characterisation, identifying that it will be encouraged.

In addition to this, the numbers of Listed Buildings or Scheduled Ancient Monuments that are improved or brought back into beneficial use would be a useful indicator relating to this issue. Such an indicator should be included.

Recommendation

The three issues raised be included in the baseline characterisation, and paragraph CH12 be rewritten as follows:

CH12 The wealth of archaeological and historic remains and buildings within the county borough has resulted in there being 356 listed buildings of which 2 are grade 1 and 30 grade 11*. There are 46 scheduled ancient monuments and 4 historic parks and gardens, these being Maes Manor, The Van, Ruperra Castle and Cefn Mably. Gelligaer Common is the County borough's only registered Historic Landscape and this is under threat from a range of sources including changing farming management and abuse from the use of off road

vehicles. Ruperra Castle is the subject of development pressure for conversion to residential use. Proposals have been submitted that incorporate inappropriate forms of development. It is important, in order to ensure the integrity of the heritage at Ruperra castle that such inappropriate development is not permitted. By contrast Caerphilly Castle has potential to increase its tourism and promotional role for the town of Caerphilly. Such improvements must be delivered in sympathy to the heritage importance of the castle itself.

CH13 There are also 14 Conservation Areas within the county borough. These designations cover a wide range of buildings, monuments and archaeological sites ranging from the pre-historic to the modern. Unsurprisingly many relate to development during the industrial revolution with there being a large number of important civic, religious and industrial buildings and structures included within the lists. Many of these buildings and structures have lost their reason for being and due to this, often coupled to their location, size and functionality have either been abandoned or are under threat. New legislation is likely to increase the number and range of sites and monuments that will benefit from further protection.

CH14 A key issue in respect of the authority's industrial heritage is its protection and, more importantly, the beneficial reuse of its buildings. Bringing these buildings back into beneficial use will help to ensure their continued retention. However, bringing the buildings back to beneficial use should not be done at the expense of their heritage value.

In addition to this an additional indicator should be added to Issue 2 Culture

g. Number of Listed Buildings and Scheduled Ancient Monuments improved and/or reused.

Section of Scoping Report

Chapter 6 – Cultural Heritage and Landscape – Issues

Summary of comment and any Suggested Amendment

The additional issues might also be relevant to the list of issues identified, which are very generalised and which need further work for the sake of clarity, although they do flag up the broad range of issues across the topic. For example, Issue 1 refers to ‘threats’ to listed buildings etc and breaks it down into Type, Use and Location of building, but it not clear what the nature of the threat is, or what is implied by the a., b. and c. subsets. From our point of view, particularly in the context of the LDP, our key concern relates to pressures from inappropriate development.

Officer Response

The Issues section highlights the overall issues that have been discussed as part of the Baseline Characterisation. It is not intended to reiterate the detail of the discussion under this section. This is covered in Paragraph 6.5 of the Draft Scoping Report, which states *‘Each topic covered below provides some background information in terms of the topic area and the main issues affecting the County borough are identified. These issues are summarised in bullet point form.’*

In respect of the main threat to Listed Buildings being inappropriate development it would not be possible to list all potential threats. Indeed, different people may have differing views on what is the most important threat. Consequently it is considered most appropriate to identify the general issue of threats rather than trying to list all types of threat.

Recommendation

The first issue under the Issues section be reworded as follows:

1. Threats to listed buildings/scheduled ancient monuments/historic features.
 - a. ~~Type of building~~
 - b. ~~Use of building~~
 - c. ~~Location of building~~

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Cultural Heritage and Landscape – Issues****Summary of comment and any Suggested Amendment**

Several of the issues are unclear and do not obviously link to the themes developed in the main body of the discussion. There is no mention of LANDMAP in the issues. They should consider the integrity/quality of the landscape/cultural heritage assets (for example, field boundaries, common land, forestry, trees and woodland etc.).

Officer Response

LANDMAP is the assessment tool rather than the issue and its extensive use has been highlighted in the text. The considerations outlined form part of the LANDMAP component parts and as such have been included in the analysis. It is agreed that they are important elements in terms of culture, heritage and landscape but are dealt with as a whole.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Cultural Heritage and Landscape****Summary of comment and any Suggested Amendment**

Suggested additional objective and indicators in the Living Environment objectives :-

Issue	Objective	Indicator
Landscape	Maintain a clean and accessible environment to encourage a greater sense of belonging and identity	<ul style="list-style-type: none"> • Cleanliness of streets, litter, graffiti, fly-tipping etc • Amount of new development including areas set aside for the environment and wildlife

Officer Response

The inclusion of the objective is agreed. However it should be added to the existing objective in order to retain a single objective per issue.

An indicator regarding ‘cleanliness’ should be included and it is recommended that this covers the areas of fly tipping and abandoned motor vehicles. Both accessibility and ‘green’ space is dealt with elsewhere and it is difficult to define the proposal and as such it is not recommended to include the second requested indicator.

Recommendation

The objective be amended to read as follows:

To protect the landscape value of the most important landscapes in the county borough and maintain a clean and accessible environment to encourage a greater sense of belonging.

A new indicator be included as follows:

d. Numbers of reported incidents of fly tipping and abandoned cars.

Section of Scoping Report

Chapter 6 – Cultural Heritage and Landscape – Objectives

Summary of comment and any Suggested Amendment

On Sustainability Objectives and Monitoring Objectives, I would agree with the proposal made earlier in the report that these should be limited in number and focussed on key issues. With regard to the three Issues listed in the Cultural Heritage and Landscape section, I think issue 3 is defined too tightly, in limiting itself to buildings, and might better be titled as Historic Assets or Historic Features. Following on from this the objective might be “To protect and enhance significant historic features”. I think it is quite appropriate for the plan to seek to go further than to simply protect.

Officer Response

The support of the principle of limiting the number and focus of objectives is welcomed.

Issue 3 ‘*Historic Buildings*’ also relates to features as well buildings. Consequently it appropriate to amend the heading and other references to ‘Historic Assets’.

There is always a debate regarding whether it is possible to both protect and enhance something, as they are not mutually compatible. Enhancing implies improvement and alteration of the current status quo and therefore cannot be equated to protection. However, in general terms it also implies the minimum and maximum requirements that are being sought, i.e. protect – minimum requirement, enhance – maximum requirement. Given that this is an objective and not a more specific indicator, it is appropriate to use the whole of the term.

Recommendation

Issue 3 be amended as follows:

3. Historic ~~Buildings~~Assets

And objective 3 be amended as follows:

To protect and enhance important historic ~~buildings~~assets

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Cultural Heritage and Landscape – Objectives and Indicators****Summary of comment and any Suggested Amendment**

Several of the indicators selected in this section are not relevant, or reactive, to the policies, themes and issues within the developing LDP, for example, indicators such as “area of land under agreed management for landscape improvement/protection”. They need to be defined more in terms of things like the numbers of developments approved on common land, degree of urbanisation of rural roads etc. There is no mention of maintaining traditional settlement patterns

Officer Response

Partial agreement with the comments and it will be interesting to interpret the new guidance when this is available. As recommended on the sheet below additional/amended indicators can be brought in through the consultation process. The indicator relating to land management was an attempt to include environmental management through initiatives such as Tir Gofal, as requested by CCW. It is however recognised that the ability of the Plan to influence this take up maybe limited. It does however provide a good indication of environmental management and at a lower level allows for monitoring of ‘planning gain.’ Split into 2 indicators, the first a measurement of agri/environment take up and the second relating to planning gain.

The issue of the urbanisation of highways is too subjective and is not monitored whilst the issue of protecting settlement patterns is a strategy or policy consideration for the LDP.

Recommendation

A new indicator be included as follows:

e. [Area of land subject to an environmental management agreement tied to a planning consent.](#)

Section of Scoping Report

Chapter 6 – Cultural Heritage and Landscape – Indicators

Summary of comment and any Suggested Amendment

With regard to indicators I would agree indicator (g) is appropriate. However, I am not clear about what is intended by the reference to a “register of archaeological remains” in indicator (h). If this is intended to refer to the Historic Environment Record (HER) maintained by GGAT, there would seem some crossover with indicator (i). The latter would seem a very good indicator and preferable to indicator (h), in so far as development of a site recorded in the HER might not necessarily be problematic or inappropriate provided GGAT (and Cadw’s) advice is followed. Finally, whilst I would not object to indicator (j) I am not sure how useful it will be now that the listing resurvey is complete, the three preceding indicators would seem to cover listed building and scheduled monument issues adequately. Instead it might be more useful to include an indicator aimed at the protection and enhancement of conservation areas or historic parks and gardens.

Officer Response

The support for indicator (g) is welcomed.

Indicator (h) does indeed intend to reference the Historic Environment Record and it is agreed that there is considerable overlap with the subsequent indicator. This indicator should, therefore, be deleted.

Since the resurvey has been completed it is acknowledged that indicator J does not really have any value. An indicator relating to protection of Historic parks and gaerdens would be a beneficial addition

Recommendation

Indicator (h) be deleted and replaced with the following indicator:

[h. Number of developments following advice of the Glamorgan and Gwent Archaeological Trust \(GGAT\)](#)

And Indicator (j) be deleted and replaced with the following indicator:

[j Number of planning refusals for development proposals on land within Historic Parks and Gardens](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Cultural Heritage and Landscape – Issue 1, Indicator C****Summary of comment and any Suggested Amendment**

suggested re-wording “Area of land developed beyond defined settlement boundaries for non-agricultural uses”.

Officer Response

Rewording of the indicator would make it clearer. Although the phrase ‘beyond settlement boundaries’ relates to the areas of land and the rewording should reflect this.

Recommendation

Indicator C be amended as follows:

- c. Area of land, **beyond defined settlement boundaries**, developed beyond for non agricultural uses ~~beyond defined settlement boundaries~~

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Cultural Heritage and Landscape – Objectives and Indicators****Summary of comment and any Suggested Amendment**

CCW will be issuing guidance on SEA and Landscape in Autumn 2006; pending the production of this guidance it would be useful if a degree of flexibility/adaptation could be built into the landscape objectives/indicators.

Officer Response

Whilst it maybe difficult to consider what will be identified in this guidance it is never the less felt that the existing methodologies are robust and it is not anticipated that major new issues will emerge. If this does not prove to be the case it is never the less possible to add or amend indicators during later stages of consultation.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Water – Para W2

Summary of comment and any Suggested Amendment

An amendment is required to paragraph W2. The sentence commencing “Figure 11, below, indicates the parts of the countyas defined by the Environment Agency.” Should be amended to read “Figure 11, below, indicates the parts.....as defined by the Welsh Assembly Government’s TAN 15.”

These are not Environment Agency definitions. They are derived from the Welsh Assembly government’s Technical Advice Note (TAN)15.

Officer Response

Agree. Reword as requested.

Recommendation

Paragraph W2 be amended as follows:

W2 Due to the county borough’s westerly location and its mountainous nature in addition to proximity to the sea, the catchments receive a high annual average rainfall of slightly short of 1400mm. Despite the catchment’s altitude little of this falls as snow. Although the rainfall is throughout the year the thin sandy soils, the sandstone and the rocks of the coal measures do not retain large quantities of water in storage and therefore provides little base flow support to the water courses. Consequently the main rivers are ‘flashy’ in nature, with quite rapidly diminishing flows during dry periods, very rapid rises in river levels during heavy storms and periodic flooding during the winter months. The base flows of these rivers has however reduced since the closure of the coal mines which pumped considerable amounts of underground water into the main river channels. The average daily flow of the River Rhymney as it flows into the estuary is 5.95 cubic metres per second, whilst during a dry summer this is reduced to approximately .6 of a cubic metre per second. Figure 11, below, indicates the parts of the county borough designated as ‘flood plain’, categories C1 and C2 as defined by the ~~Environment Agency~~ [Welsh Assembly Government’s TAN 15](#). Flooding may become more frequent as a result of global warming and many commercial and residential properties within the county borough fall within the area at risk of flooding from a once in 100 year occurrence. The Environment Agency seek to ensure that developments should in most instances not be located on flood plains and when practicable should provide permeable surfaces and a wider sustainable urban drainage system in order to reduce flash run off and help diffuse pollution.

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Water – Para. W2****Summary of comment and any Suggested Amendment**

Additional amendment required to sentence commencing “Flooding may becomefrom a once in 100 year occurrence”. Should be amended to read “Flooding may become.....from a one in 1000 year occurrence.

Officer Response

Agree. Reword W2 as requested.

Recommendation

Paragraph W2 be amended as follows:

W2 Due to the county borough’s westerly location and its mountainous nature in addition to proximity to the sea, the catchments receive a high annual average rainfall of slightly short of 1400mm. Despite the catchment’s altitude little of this falls as snow. Although the rainfall is throughout the year the thin sandy soils, the sandstone and the rocks of the coal measures do not retain large quantities of water in storage and therefore provides little base flow support to the water courses. Consequently the main rivers are ‘flashy’ in nature, with quite rapidly diminishing flows during dry periods, very rapid rises in river levels during heavy storms and periodic flooding during the winter months. The base flows of these rivers has however reduced since the closure of the coal mines which pumped considerable amounts of underground water into the main river channels. The average daily flow of the River Rhymney as it flows into the estuary is 5.95 cubic metres per second, whilst during a dry summer this is reduced to approximately .6 of a cubic metre per second. Figure 11, below, indicates the parts of the county borough designated as ‘flood plain’, categories C1 and C2 as defined by the Welsh Assembly Government’s TAN 15. Flooding may become more frequent as a result of global warming and many commercial and residential properties within the county borough fall within the area at risk of flooding from a once in ~~100~~1000 year occurrence. The Environment Agency seek to ensure that developments should in most instances not be located on flood plains and when practicable should provide permeable surfaces and a wider sustainable urban drainage system in order to reduce flash run off and help diffuse pollution.

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Water – Para. W2

Summary of comment and any Suggested Amendment

The following paragraphs should be included at this point, or in Appendix 1, under Tan15.

Where flooding is a strategic issue that significantly constrains development options, local authorities should use the precautionary framework as part of considering sustainability options and, where necessary, set out the positive steps which have been taken to promote development in zones A and B.

The requirements of TAN15 will be a material factor in the formulation of specific policies and allocation of sites within the LDP.

Highly vulnerable development should not be permitted in zone C2. Any other development should only be made in zone C if it can be justified that a development/use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1.

There is a need to reduce impact from sewers and urban run-off on water quality of rivers by employing separate drainage systems for new and replacement development (reducing surface water discharged to combined sewers) and source control of industrial/urban drainage using passive treatment methods

Officer Response

Disagree/Agree. Whilst the comments received are not disagreed with this Scoping Report is not the place for inclusion as the requests in both paragraphs 1 and 2 are relevant to the LDP procedure and are best addressed through that document and its preparation.

The issues in paragraph 3, relating to water run off, are included within W2 however the inclusion of the above paragraph adds further weight and is recommended to be included within W2.

Recommendation

Paragraph W2 be amended as follows:

W2 Due to the county borough's westerly location and its mountainous nature in addition to proximity to the sea, the catchments receive a high annual average rainfall of slightly short of 1400mm. Despite the catchment's altitude little of this falls as snow. Although the rainfall is throughout the year the thin sandy soils, the sandstone and the rocks of the coal measures do not retain large quantities of water in storage and therefore provides little base flow support to the water courses. Consequently the main rivers are 'flashy' in nature, with quite rapidly diminishing flows during dry periods, very rapid rises in river levels during heavy storms and periodic flooding during the winter months. The base flows of these rivers has however reduced since the closure of the coal mines which pumped considerable amounts of underground water into the main river channels. The average daily flow of the River Rhymer as it flows into the estuary is 5.95 cubic metres per second, whilst during a

dry summer this is reduced to approximately .6 of a cubic metre per second. Figure 11, below, indicates the parts of the county borough designated as 'flood plain', categories C1 and C2 as defined by the Welsh Assembly Government's TAN 15. Flooding may become more frequent as a result of global warming and many commercial and residential properties within the county borough fall within the area at risk of flooding from a once in 1000 year occurrence. The Environment Agency seek to ensure that developments should in most instances not be located on flood plains and when practicable should provide permeable surfaces and a wider sustainable urban drainage system in order to reduce flash run off and help diffuse pollution. [There is a need to reduce impact from sewers and urban run-off on water quality of rivers by employing separate drainage systems for new and replacement development \(reducing surface water discharged to combined sewers\) and source control of industrial/urban drainage using passive treatment methods.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Water – W2****Summary of comment and any Suggested Amendment**

It would be useful to have some indication of existing flood defences, weirs etc. Are these flood defences adequate/in need of upgrading particularly in light of possible issues relating to Climate Change?

The Environment Agency Wales (EAW) Flood Risk Management Plans should be referenced in appendix 1 and relevant findings incorporated in the SEA where appropriate.

Officer Response

The flood maps give an indication where defences are not in place or are weak. It is not recommended that any changes are made however reference to EAW's Flood Risk Management Plans be included in Appendix 1.

Recommendation

The Flood Risk Management Plans be included in Appendix 1.

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Water – Para. W3

Summary of comment and any Suggested Amendment

It would be useful to include a reference to the Coal Authority's programme of remediation of contaminated minewater discharges which are selected for remediation on the basis of the Environment Agency's priority listing (ref: Environment Agency Wales and Coal Authority Liaison Group). It would also be beneficial for the issue of mine waters from abandoned coal mines to be expanded to state explicitly what is going to be impacted from such water.

Officer Response

Agree. Include in text of W3 the range of discharges, the effect of these and what is being done to remediate the problem.

Recommendation

Paragraph W3 be amended as follows:

W3 As is the case in many parts of Wales the surface water and ground water interaction is very complex. In the Caerphilly area there is the additional influence of the connections between old mine workings. There is still some doubt about the behaviour of ground water levels in the aftermath of the cessation of the mining industry. Whilst across much of the eastern part of the coal field ground water levels have probably recovered and stabilised in some parts of the county borough recovery is considered to still be ongoing. Several of the mine water escapes are characterised in the river by the deposition of iron oxides which change the river bed an orange colour. Whilst the groundwaters within the County borough are replenishing they do require protection in terms of both the quantity and quality of water entering. Mine water discharges are occurring widely within the County borough and range from small limited escapes to larger continuous discharges that in some cases can change the bed of a water course orange through the deposition of iron oxide. This can be particularly noticeable during periods of low water and has the effect of smothering the bed of the river and destroying the ecosystem. The EA have produced a priority list of sites for treatment across south wales, through the Coal Authority's remediation programme several of which are within the County borough.

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Water – Para. W3

Summary of comment and any Suggested Amendment

The last sentence of paragraph W3 states that ‘whilst the groundwaters within the County borough are replenishing they do require protection in terms of both quantity and quality of water entering.’

- It is assumed, although not directly stated, that this paragraph is referring to the potential rise in groundwater level associated with the cessation of local mining and subsequent rebound of minewater. The Agency currently has no monitoring boreholes in the Caerphilly area and therefore cannot comment on the ‘replenishment’ of aquifers in the borough and appropriateness of this comment. We would however question what is meant by replenishment and on what basis this comment is made.
- The last comment regarding protecting groundwater is noted but the sentence needs to be rewritten as currently it does read very well in its current form.

Officer Response

The observation is based on text within Landmap. It is recommended to drop the reference to replenishment and limit the text to the protection of the aquifer by rewording final sentence of W3.

Recommendation

Paragraph W3 be amended as follows:

W3 As is the case in many parts of Wales the surface water and ground water interaction is very complex. In the Caerphilly area there is the additional influence of the connections between old mine workings. There is still some doubt about the behaviour of ground water levels in the aftermath of the cessation of the mining industry. Whilst across much of the eastern part of the coal field ground water levels have probably recovered and stabilised in some parts of the county borough recovery is considered to still be ongoing. Several of the mine water escapes are characterised in the river by the deposition of iron oxides which change the river bed an orange colour. ~~Whilst the groundwaters~~ aquifers within the County borough ~~are replenishing they do~~ require protection in terms of both the quantity and quality of water entering ~~them~~. Mine water discharges are occurring widely within the County borough and range from small limited escapes to larger continuous discharges that in some cases can change the bed of a water course orange through the deposition of iron oxide. This can be particularly noticeable during periods of low water and has the effect of smothering the bed of the river and destroying the ecosystem. The EA have produced a priority list of sites for treatment across south Wales, through the Coal Authority’s remediation programme several of which are within the County borough.

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Water – Para. W4

Summary of comment and any Suggested Amendment

An amendment is also required to paragraph W4, page 35, sentence: *'Wales have undertaken comprehensive research into the availability of water for abstraction and concluded that the River Rhymney has capacity for further abstraction, with the exception of the Nant Gledyr a tributary leading into the River Rhymney at Caerphilly.'*

The reference to the Nant Gledyr is incorrect. There has been a misunderstanding as to what the classification 'No Water Available' means. There is water available in the Nant Gledyr catchment but it is limited. No Water Available means No Water Available at low flows only, there is water available at higher flow rates. Please could W4 be amended accordingly.

Officer Response

Agree. Rework para W4 as indicated.

Recommendation

Paragraph W4 be amended as follows:

W4 The Environment Agency have adopted a national method for classifying water quality in rivers and canals/the general quality assessment (GQA) which assess both the chemical and biological quality of water bodies. In terms of chemical water quality for the River Rhymney some 77% of the river length is assessed as being good or very good (the top criteria) whilst none of the river has a GQA grade of D, E or F. In terms of biological quality none of the River Rhymney has a grade A very good rating. However 59% of the river is graded B (very good), 38% grade C (good) and only 2% fair with again there being no poor or bad recordings grades E and F. The biological quality of water for the Ebbw and Sirhowy includes some stretches that are classified as poor whilst the majority is classed as being fairly good (grade C). The chemical quality of water in the catchment is better being mainly good (grade B). The volume of water within the rivers is also critical and the Environment Agency Wales have undertaken comprehensive research into the availability of water for abstraction and concluded that the River Rhymney has capacity for further abstraction, with the exception of the Nant Gledyr a tributary leading into the River Rhymney at Caerphilly [at times of low water flow](#). The majority of water currently abstracted comes direct from the rivers and their supporting reservoirs of which approximately half is fed into the public water supply with a further 29% going to commercial uses and 20% to industrial use. The majority of public water supply to the county borough does however come from reservoirs beyond the county borough. Industrial abstraction is likely to have significantly reduced recently due to the closure of steelworks.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Water – W4****Summary of comment and any Suggested Amendment**

River sections with “poor” water quality should be identified and where possible linked with the factors outlined in W5. What are the remaining issues to be tackled by the Welsh Water AMP process? Are there any remaining foul water/sewage capacity issues and/or water treatment capacity issues and, if so, are there plans in place to resolve them? This is particularly important if any of these issues are potentially significant enough to act as limitations on new development. This also applies to water supply if resources are nearing capacity (W7 refers to capacity issues in summer months). Where reference is made to EAW’s Catchment Abstraction Management Strategies (CAMS) it should be made clear how this relates to possible supply problems (“Hands off Flow” conditions attached to licences may effectively reduce summer capacities even though the over all assessment for a river may be “water available”).

Officer Response

Much of the above relates to matters of detail whilst it is the intention of the Scoping Report to identify strategic issues. It is agreed that broad capacity is a strategic issue however this has not specifically been identified by suppliers or operators as problematic at a strategic level. A part of the equation is making existing resources ‘go further’ rather than seeking to increase capacity. Localised problems can usually be identified and addressed as part of the designation and development process.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Water – W5****Summary of comment and any Suggested Amendment**

“Rivers are at risk of failing the Water Framework Directive” – How and what measures are being proposed to address this?

Officer Response

The Baseline Characterisation is intended to provide a broad view of the issues that are currently important within the County Borough. It is not intended that the Baseline Characterisation provide detailed analysis of these issues, or to outline measures that are being undertaken to address them. The role of Scoping Report is to set out the current state of the environment as a basis for considering the proposals of the LDP, which may well provide some solutions to this issue. It would be inappropriate for the Scoping Report to prejudge such measures by prescribing what could be done in the Baseline assessment.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Water – Para. W5****Summary of comment and any Suggested Amendment**

AMP is mentioned in the context of pollution incidents where the situation with *direct sewage connections* has been much improved. This is the only mention of AMP in the whole document. It does not describe or explain what it is, other than it is a programme of Welsh Water's. The term should be explained and expanded upon.

Officer Response

Agree. Remove reference to AMP and refer to the Primary Sewer improvements undertaken by Welsh Water.

Recommendation

Paragraph W5 be amended as follows:

W5 Pollution of the water courses within the county borough comes from a number of sources and have proven catastrophic for wildlife in the past. Whilst mainly limited to 'one off' industrial pollution incidents there is also an issue with direct sewage connections, a situation much improved as a result of the ~~AMP programmes~~ Primary Sewer improvements undertaken by Welsh Water. Run off from urban developments and the inappropriate disposal of chemicals from industry, domestic residencies and agriculture and landfill sites also have an effect. It is anticipated that the extent and incidence of pollution within the county borough will decrease. However, the rivers are currently rated as being at significant risk of failing the objectives set out in the Water Framework directive.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Water – W6****Summary of comment and any Suggested Amendment**

Only 3 of the Borough's SSSIs contain 'wet' habitats. CCW is currently in the process of monitoring the condition of all SSSI's/SACs and this information will be made available to Caerphilly to incorporate into the assessment. There is a need to reference potential effects of development within the catchment of the Aberbargoed Grasslands SAC.

Officer Response

We welcome the monitoring information offered by CCW.

The Aberbargoed SAC will need to be the subject of an Appropriate Assessment, as prescribed by the Habitats Directive, which will include the need to consider potential impacts upon the SAC from potential developments. Reference to this has already been proposed to be included in Paragraphs 1.1 and B2.

Recommendation

No other amendment be made in respect of this comment.

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Water – Figure 11****Summary of comment and any Suggested Amendment**

Flood Zone B should be added to Figure 11 and a statement made in the text that the zones may be subject to review by the Welsh Assembly Government.

Officer Response

Agree. Include Flood zone B on Figure 11. A change has already been recommended as a result of a previous change in respect of the Welsh Assembly Government's role in identifying the flood zones.

Recommendation

Figure 11 be amended by the inclusion of the areas covered by Flood Zone B

Section of Scoping Report**General****Summary of comment and any Suggested Amendment**

There are issues of copyright regarding the information taken from the *Rhymney Catchment Abstraction Management Strategy (CAMS) Technical Document* and the *Geological cross-section in Figure 12*. The Council needs to ensure they have the relevant permissions to use this information.

In addition Figure 12 will need to include the relevant copyright statement.

Officer Response

Permission has been gained to utilise the information from the CAMS document. This information will remain in the Scoping Report.

Failed to conclude copyright issue on the geological cross section and as such the figure should be removed.

Recommendation

Figure 12 be deleted from the document.

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Water - General****Summary of comment and any Suggested Amendment**

As a general point a number of issues highlighted in this section (2,3,4,and 5) are not considered as part of the subsequent table of ‘sustainability objectives and monitoring indicators’. How is it intended for these particular issues to be included in the sustainability objectives and indicators to assess the policies and proposals of the LDP?

Officer Response

It is not the intention to address every issue that has been identified within the scoping report. The purpose is to identify the most significant issues and also those issues which can be monitored. These are the issues that are taken forward whilst having indicated that the others have been considered.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Water – Issue 1****Summary of comment and any Suggested Amendment**

Magnitude and predicated changes in flooding should be included

Officer Response

There are two separate elements relating to the ‘incidence’ of flooding, the frequency of flooding occurring and the extent of the flooding. This should be reflected in the Issue.

Recommendation

Issue 1 be reworded as follows:

- 1 Flooding and how to limit ~~incidence~~ its frequency and extent

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Water – Additional Issues****Summary of comment and any Suggested Amendment**

Additional issues to be considered include sewage/foul water treatment capacity, flood defences and obstructions to fish movements (such as weirs).

Officer Response

The issue of sewage/foul water treatment capacity has been considered under another comment and amendments have been proposed to paragraph MA2 that addresses the issues. It is not proposed to provide any further changes in respect of this issue as a result of this comment..

It is felt that flood defences need not specifically be an issue as they are covered by the more general flooding issue and the obstructions to fish movements are better addressed in the biodiversity section if considered strategic.

Recommendation

No further changes be made in respect of this comment.

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Water – Sustainability Objectives and Monitoring Indicators****Summary of comment and any Suggested Amendment**

The first issue has an objective to ‘protect aquifers and improve the quantity and quality of the water in our rivers and to reduce water consumption’. Firstly, the reference to aquifers is assumed, but not stated, to allow for the protection of both groundwater quality and quantity. As this is not outlined in the report then this section needs to be changed as necessary. Secondly, assuming this to be the case none of the indicators actually provide a mechanism to allow the assessment of how this objective has or can be achieved. It is recommended that further consideration be given to amending this section to ensure that each part of this objective can be assessed fully.

Officer Response

With regard to the first issue this has been clarified by previous rewording. If the EA are not monitoring groundwater levels then it is agreed that at this stage only assumptions can be made rather than an inclusion of a detailed indicator capable of monitoring. This does not prejudice the objective and appropriate monitoring may become available at a later date.

Recommendation

No further amendment in respect of this comment.

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Water – Sustainability Objectives and Monitoring Indicators

Summary of comment and any Suggested Amendment

With respect to issue 1 ‘Water Quantity, Quality and Use’ indicator 4 reads ‘increase in number and volume of surface and groundwater abstractions’. It is noted from the report that a review of such abstractions is intended to provide an indicator of this issue. Firstly, it is again apparent the collection of river and groundwater abstraction data may not in itself ensure that the objective is met as currently written. It should be noted that abstractions comprise both licensed and unlicensed abstractions. The Environment Agency Wales will be able to provide data on all licensed abstractions in the catchment but not necessarily unlicensed abstractions, for example private water supplies or recently deregulated abstractions. For reference, the borough Environmental Health Department would keep records of private water supplies they sample but not necessarily the type of supply (well/borehole or spring) or indeed the volume used for abstraction). Therefore, it is recommended that the wording of this section be changed to reflect what type of abstractions are actually being referred to and where the data for the volumes of abstractions will be sourced.

Officer Response

Agreed. As only licensed abstractions can be monitored with any accuracy it should be these that are used as an indicator, the data coming from the EA. Table to reflect above amendment and identify data source.

Recommendation

Indicator D be amended as follows:

- d. Increase in the number and volume of ~~surface and ground~~ [Environment Agency licenced](#) water abstractions

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Water – Objectives and Indicators****Summary of comment and any Suggested Amendment**

There should be an indicator for river habitat quality (River Habitat Survey?) and for foul water discharge.

Officer Response

The issue of river habitat quality is covered by Indicator (b) Percentage of river lengths good or better quality for Biological Quality. These can be subjective and are not comprehensively monitored. Existing indicators are considered adequate for the purposes of developing and monitoring the LDP.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Water – Sustainability Objectives and Monitoring Indicators

Summary of comment and any Suggested Amendment

The following changes are proposed

Issue	Objective	Indicator
1. Water Quantity, Quality and use	To protect aquifers and improve the quality and quantity of the water in our rivers and to reduce water consumption	Indicators a -d as listed <ul style="list-style-type: none"> • Number of confirmed water pollution incidents • Amount of water metering installed compared with Ofwat targets • Number of water efficient developments
2. Water Recreation	Maintain and enhance riverside and water based recreational activities eg angling, canoeing	<ul style="list-style-type: none"> • Number of rod licences sold in area • Length of access routes or footpaths along rivers
3. Flood	To minimise the number of developments affected by flooding	Indicators e -g as listed <ul style="list-style-type: none"> • Amount of development within C1 and C2 as defined by TAN15 • Percentage of new development with Sustainable Urban Drainage Systems

Officer Response

Agree with additional indicator proposed for pollution incidents, provided EA can provide data.

Disagree with the indicator for water metering as the provision of these has become mandatory for domestic properties.

Disagree with third indicator relating to water efficient developments as it lacks clarity and is not monitorable.

Disagree as the issue of water recreation is not felt to be sufficiently strategic to warrant its own objective. The inclusion of para W8 raises the profile of the recreational worth of water bodies and banksides.

Agree to include an indicator relating to approved development within C1 and C2 zones although there maybe overlap with indicator e.

Disagree with the proposal for SUDS indicator as it is not possible to monitor as the definition of a SUD is too vague.

Recommendation

Two new indicators be included as follows:

e. [Number of Environment Agency recorded pollution incidents](#)

i. [Amount of approved development within C1 and C2 as defined by TAN 15](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Water - Omission****Summary of comment and any Suggested Amendment**

The issue of Water Recreational activities needs to be included.

Officer Response

Agree. A new paragraph should be inserted giving details of water based recreation in the County Borough, including broad information on fish stocks.

Recommendation

A new paragraph be inserted as follows:

W8 There are a large number of reservoirs and ponds in the County borough in addition to the three main rivers and Crumlin Arm of the Monmouthshire Canal, the primary recreational use of which is angling for both coarse and game fish. There are 3 'Commercial Fisheries' in the area but most waters are controlled by Angling Clubs. Other water based recreation that takes place includes sailing and canoeing and the river banks are extensively used for recreational access notably along the Rhymney Riverside Walk.

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Water - Omission****Summary of comment and any Suggested Amendment**

The issue of Water Efficiency and awareness (public and Commercial) should be included.

Officer Response

Agree. Additional text should be included to emphasise public awareness and the need for improved efficiency.

Recommendation

Paragraph W7 be amended as follows:

W7 The average daily water consumption per household in the UK is some 150 litres which can result in capacity problems during dry summer months. This water is also treated with a range of chemicals to ensure public safety standards are met, whatever its end use. Levels of water recycling within the County borough are considered to be low, limited mainly to water provision for gardening, although detailed information is not available to confirm this. [With the likelihood of increased drought there is a need to raise awareness of both the public and commercial users of the need for greater water efficiency, particularly given the general belief that water is readily available in Wales.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – G1 to G6****Summary of comment and any Suggested Amendment**

The Borough contains 5 geological SSSI and is likely to support a number of Regionally Important Geological Sites (RIGS). The latter are currently being assessed by CCW but the importance of the geological heritage needs to be recognised.

Officer Response

The importance of the geological SSSIs and the potential for RIGS is accepted and reference should be made to these.

Recommendation

Paragraph G3 be amended as follows:

- G3 Research undertaken by the Department of Earth Science from Cardiff University as part of the development of Landmap indicates that two areas of Caerphilly County Borough have geological interest of regional importance. These are the Caerphilly ridge in the south of the county borough and the Nelson to Tredomen area. The latter of these is an excellent example of cross valley glaciation whilst the former contains a range of linear rock types. There are also a range of examples of glacial activity throughout the county borough. [There are five geological SSSIs within the county borough, and there is potential for a number of RIGS to be identified as a result of the ongoing work of Countryside Council for Wales. The quality and range of the county borough's geological heritage is an important factor in the character of the county boroughs landscape.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – G5****Summary of comment and any Suggested Amendment**

There is a need to consider soil function as well as quality and quantity; particularly important in relation to non or low permeability surfaces in areas of flood risk or poor surface drainage.

Officer Response

The functional role of soils is also an important issue that warrants reference in the Baseline Characterisation text.

Recommendation

Paragraph G5 be amended as follows:

G5 A typical cross section through the Authority would show the plateau tops, ridges and steep valley sides covered by podzolic soils of varying types over sandstone with the lower, flatter land covered by poorly drained clay soils of glacial drift origin. Figures 12 and 13, below, broadly illustrates soil cover within the Rhymney Valley and the Islwyn and Ebbw Valleys. With the exception of small land areas within the south of the county borough the MAFF agricultural land classification are lower grades 3,4 and 5, generally the higher the altitude of land the lower the classification. All the above upland soil types are capable of agricultural improvement. [The function of soils is also a pertinent issue, particularly in respect of their permeability and the implication in flood risk areas and areas suffering from poor drainage.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – G8****Summary of comment and any Suggested Amendment**

What are the current and predicted landfill capacities? Are there any new sites/expansions available/licensed?

Officer Response

Currently there is no significant landfill activity within the county borough. This is stated in the Baseline Characterisation in paragraph G8. Further reference to current provision within the text is not considered to be appropriate.

The future of landfilling in the county borough council is a policy decision that is appropriately considered through the LDP process, and should not be prejudged by the SEA/SA process. The role of the SEA/SA is to assess the policies of the LDP on environmental and sustainability grounds, and to recommend changes to the LDP that will result in a more sustainable plan. The issue of future landfilling will be part of that assessment.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – G9****Summary of comment and any Suggested Amendment**

What is the current situation of aggregate supply? Are there adequate resources and over what time scales – what are the implications on the plan and how might it relate to adjacent areas supply/demand?

Officer Response

Whilst it is acknowledged that the extraction of aggregates can have extreme impacts upon the character and environment of the county borough, the future need and winning of aggregates is a policy issue that needs to be considered through the LDP process, and should not be prejudged by the SEA/SA process. The role of the SEA/SA is to assess the policies of the LDP on environmental and sustainability grounds, and to recommend changes to the LDP that will result in a more sustainable plan. The issue of aggregate and indeed minerals extraction in relation to future need will be part of that assessment.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – Issue 3****Summary of comment and any Suggested Amendment**

It is unclear what is meant by this issue.

Officer Response

This issue relates back directly to the content of paragraph G4, which deals with geological instability and the effects it has had on human settlement. Whilst this is directly related the issue as worded does not relay the issue accurately, as the issue is geological instability, not stability.

Recommendation

Issue 3 be reworded as follows:

3. Geological instability

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Geology and Geomorphology – Issue 4****Summary of comment and any Suggested Amendment**

Issue 4 reads 'rising water table'. It is recommended that this be changed as the issue is one of the current status of the mine-water rebound rather than specifically groundwater levels which would be assumed to rise and fall due to fluctuations in annual precipitation anyway.

In addition, whilst the issue has been highlighted there is no associated 'sustainability indicator or monitoring objectives' in the subsequent table. In effect, how is the issue of 'rising water' to be assessed to determine whether it is still an issue in 'x' years time. We would be grateful for further comment on this issue.

Officer Response

Agree. Can remove this as it is more appropriately covered in the water section. As in previous cases it is not the intention to have an indicator for every issue identified and in this case the amended monitoring has been outlined on pages 11 and 16 of this report.

Recommendation

Delete issue 4 from the list of issues and re-number accordingly.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – Issue 5****Summary of comment and any Suggested Amendment**

Remediation, soil function, carbon absorption/release and permeability also need to be covered

Officer Response

These are important issues that are relevant to the issue of how contaminated land is handled. As ancilliary issues they do not warrant stand alone references, excepting permeability which is being included as a separate issue as a result of another comment. The other issues should be referenced in this issue to highlight their importance.

Recommendation

Issue 5 be reworded as follows:

5. Contaminated land, [including issues of remediation, soil function and carbon absorption/release.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Geology and Geomorphology – Issues****Summary of comment and any Suggested Amendment**

The list of issues also simply states ‘contaminated land’ without actually stating what is the issue that is being considered. Again, it would be useful for a further rewording of what is exactly being inferred by this issue.

Officer Response

This is primarily concerned with the potential problems created by contaminated land in terms of pollution, permeability, costs of remediation, usage of, unknown extent of and landscape impact. Other comments have led to a change in the wording of the issue to include these issues, but further rewording would make the issue clearer.

Recommendation

Issue 5 (re-numbered 4) be amended as follows:

~~5.4.~~ [Problems associated with](#) ~~€~~contaminated land, including issues of remediation, soil function and carbon absorption/release.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – Additional Issue****Summary of comment and any Suggested Amendment**

Need to add an indicator relating to soils, particularly permeability, and need to consider the protection/integrity of RIGS/SSSI.

Officer Response

It is agreed that soil permeability should be included as an issue.

The protection of RIGS and geological SSSIs are covered by indicator (e) '*area of approved development on land designated as RIGS or Geological SSSIs*' although they are not specifically referenced in the issues. Therefore a new issue should be included to reference the protection of these sites.

Recommendation

The Issue be amended by the inclusion of the following :

9. [The protection and maintenance of the integrity of designated RIGS and geological SSSIs](#)
10. [Soils permeability and implications for flood risk](#)

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Geology and Geomorphology – Objective 1

Summary of comment and any Suggested Amendment

need to include soil permeability

Officer Response

It is agreed that permeability should be included

Recommendation

Objective 1 be amended as follows:

To make the most efficient use of land and to reduce contamination and safeguard soil quantity ~~and~~ quality and permeability

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Geology and Geomorphology – Indicators****Summary of comment and any Suggested Amendment**

The following Indicators have been suggested

Issue	Objective	Indicator
1. Soils	To make the most efficient use of land and to reduce contamination and safeguard soil quantity and quality	<ul style="list-style-type: none"> • Total area or percentage of contaminated or damaged land • Reduction in soil-related pollution incidents and flooding
3. Waste	To reduce the amount of waste produced and increase the re-use of materials	<ul style="list-style-type: none"> • Levels of composting

Officer Response

In terms of the proposed indicator for contaminated or damaged land there is an indicator proposed in the Draft Scoping Report for monitoring the reduction in area of contaminated land and it is felt this is more appropriate.

The proposed indicator for soil related pollution incidents and flooding is already partially covered by indicators in the Water section with regard to flooding. Incidents of soil pollution are not monitored comprehensively.

Again, for the proposed levels of composting indicator it is not known how much is actually undertaken by households however records are kept for the amount of biodegradable materials diverted from landfill which in reality is materials sent for composting. As such it is felt that the existing indicator displays the required monitoring for composting.

Recommendation

No amendment be made in respect of this comment.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – Indicator 1c****Summary of comment and any Suggested Amendment**

Clarification is needed on this indicator – is it in line with definition as set out in PPW?

Officer Response

PPW does not offer a definition for reclaimed land. It does include a definition for brownfield land and uses the generic term ‘unstable and contaminated land’, although neither of these are applicable in this sense. The indicator is monitoring derelict land and how much land has been brought back to beneficial use through reclamation. In this case it is considered appropriate to retain the indicator as it stands.

Recommendation

No amendment be made in respect of this comment.

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Biodiversity – Monitoring Indicators****Summary of comment and any Suggested Amendment**

The following Indictors have been suggested

Issue	Objective	Indicator
1.Biodiversity	To Enhance the biodiversity of the county borough	Indicators a –d as now <ul style="list-style-type: none"> • Area or length of fluvial habitat improvement • Area of habitat lost as a result of development • Area of buffer zones protecting habitats from potentially disturbing/damaging developments • Length of linear habitats created, maintained or enhanced, which increase the connectivity of biodiversity habitats

Officer Response

The sentiments towards protecting habitats are fully endorsed and the issue of connectivity has come to the fore. The proposed indicators are however subjective and the baseline and monitoring information is not readily available.

Recommendation

No amendment be made in respect of this comment.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Geology and Geomorphology – Indicator 2e****Summary of comment and any Suggested Amendment**

How does this relate to issue 7?

Officer Response

Previous comment has resulted in a new issue being inserted in the issues section that relates to the protection of RIGS and geological SSSIs. Indicator (e) relates directly to this issue.

It is not intended that an objective or indicator be brought forward for every issue identified in the issues sections in each topic. The resultant number of indicators would be excessive and result in very unwieldy and complicated assessments later on in the process. Best practice advice is that objectives be limited to no more than 25, which is the number currently contained in the draft Scoping Report. A number of other objectives could have been included but the ones selected represent the most appropriate objectives that are relevant, monitorable and have access to regularly updated information. The addition of another objective is not considered necessary.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Biodiversity – General****Summary of comment and any Suggested Amendment**

This section needs to provide as much guidance and advice as possible on the Appropriate Assessment (AA) of the LDP, however, it should be made clear the AA applies to the whole of the LDP and not just biodiversity issues.

Officer Response

It is agreed that an “Appropriate Assessment” of the LDP is required. It is also agreed that the Appropriate Assessment be included within the SEA/SA report. It is intended that the relevant Natura 2000 sites are referenced in this Scoping Report, along with a brief statement advising that an Appropriate Assessment is required. The assessment itself will be included in the Part 2 Environmental Report, in its own section. An amendment to modify paragraphs 1.1 and B2 relating to the issue of cross referencing has already been recommended.

However, The issue of cross referencing has been considered from the outset in drafting the Scoping Report. There are many issues that relate across a number of the topic areas. Cross referencing between them could lead to a significant level of duplication and over-complicate the document. Consequently it was decided that issues would be addressed in one topic area only, without cross referencing. This stance needs to be stated in the methodology to the Scoping Report to clarify the situation. An amendment to include a new paragraph relating to the issue of cross referencing has already been recommended.

Recommendation

No further amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Biodiversity – B2****Summary of comment and any Suggested Amendment**

There are 5 biological SSSIs within the Borough.

Officer Response

It is accepted that there are 5 SSSIs that have been identified on biological grounds.

Recommendation

Paragraph B2 be amended as follows:

The county borough also has 10 nationally important sites, Sites of Special Scientific Interest, of which ~~6~~5 have been designated for their biological interest and the remaining ~~4~~5 on geological interest.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Biodiversity – Issue 4****Summary of comment and any Suggested Amendment**

need to consider barriers to movement/migration within river corridors

Officer Response

It is agreed that this issue should be referenced in the Baseline Characterisation.

Recommendation

Paragraph B4 be amended as follows:

- B4 The main reasons for the loss of bio diversity are considered to be through development, land use change, agricultural intensification, pollution, introduction of non-native species, disturbance, neglect, over exploitation, climate change and a lack of knowledge. Within Caerphilly county borough its wildlife is threatened by many human activities but the two key threats are, considered to be, from development and changes in land management. Of importance here is the loss of wildlife corridors whether this be hedgerow removal, ~~or~~ breakup of vegetation along watercourses, [or creation of barriers within watercourses](#). There are also threats from invasive species including plants such as Japanese Knotweed and Himalayan Balsam and animals such as Grey Squirrels and Signal Crayfish.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Biodiversity – Issue 8****Summary of comment and any Suggested Amendment**

need to cross reference to section on population and human health

Officer Response

The issue of cross referencing has been considered from the outset in drafting the Scoping Report. There are many issues that relate across a number of the topic areas. Cross referencing between them could lead to a significant level of duplication and over-complicate the document. Consequently it was decided that issues would be addressed in one topic area only, without cross referencing. This stance needs to be stated in the methodology to the Scoping Report to clarify the situation. An amendment to include a new paragraph relating to the issue of cross referencing has already been recommended.

Recommendation

No further amendment be made in respect of this comment

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Biodiversity – Issue 10

Summary of comment and any Suggested Amendment

include development pressures

Officer Response

It is agreed that this should be included in the issue

Recommendation

Issue 10 be amended as follows:

10. Recreational [and development](#) pressures

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Biodiversity – Indicator 1b****Summary of comment and any Suggested Amendment**

Indicators must be realistic, relevant and reactive. Hectares of designated land is not reactive to the LDP's implementation. Need to consider the quality and integrity of designated sites and also define what is meant by "designated sites" ie just SSSIs or also SINC's? Existing sites or new ones?

Officer Response

It is agreed that whilst additional sites may be designated as SSSIs or SINC's during the plan period it is not necessarily the most appropriate measure of this issue. The indicator should be reworded to identify what is being considered and take account of quality of designations rather than just quantity. In order to reflect 'quality' it is proposed that 2 indicators be used, 1 for biological SSSI's and the other for SINC's and LNR's.

Recommendation

Indicator (b) be replaced by a new indicator as follows:

[b. Area of biological SSSI lost to development](#)

and a new indicator be included as follows:

[c. Area of LNR and SINC lost to development.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Biodiversity – Indicator 1c****Summary of comment and any Suggested Amendment**

is a negative indicator, should consider ways of turning this into a positive indicator, for example, habitat creation through planning gain (section 106 agreements) and Better Woodlands for Wales agreements etc.

Officer Response

Whilst it is agreed that the indicator is negative in nature, it relates to the real problem of development proposals resulting in loss of potentially ecologically valuable hedgerows and woodlands, with few developments realising any real benefits to the ecological asset. Whilst an indicator as suggested by the comment would be positive, it should be noted that the number of planning applications that realise true increase in the ecological asset are very few in number. It is considered that the current indicator provides the best indicator for this issue.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Climatic factors

Summary of comment and any Suggested Amendment

It may be worth including reference to ozone in the background and issues as this can affect rural areas during the summer months.

Officer Response

Agree. Whilst the issue of high ozone levels has not been specifically raised in terms of the County borough the area is never the less primarily rural and as such there is the potential for ozone problems. The issue of ozone is raised in the Air Pollution section and it is recommended that paragraph A1 is expanded with regard to ozone and paragraph CF2 of Climatic Factors refers to the Air Pollution section.

Recommendation

Paragraph A1 be amended as follows:

A1 Historically the major air pollution problem has been associated with the burning of sulphur containing fossil fuels such as coal for heating and industrial purposes leading to smoke and sulphur dioxide. The major threat to clean air is now posed by traffic emissions. Petrol and diesel engines emit a wide variety of pollutants, principally carbon monoxide, oxide of nitrogen, volatile organic compounds and particulates which have an increasing impact on, particularly, urban air quality. Whilst these are generally associated with the urban areas, ozone at ground level tends to be more associated with rural areas [and over 80% of the County borough is rural in nature and as such the potential for ozone to be problematic exists although no monitoring information is currently available](#). Acid deposition, primarily through acid rain, can also take place at long distances from the source of the pollution. Generally industrial and heating pollutant sources, together with their impact on air quality, tend to be either in a steady state or improving over time. However, traffic generated pollution, which in the UK accounts for approximately 50% of nitrogen dioxide emissions and 90% of carbon monoxide pollution are worsening. In particular the issue of commuter traffic to Cardiff could have increasingly significant effects on the environment of the county borough. In addition to pollution related to combustion, pollutants are often contained within building materials.

And paragraph CF2 be amended as follows:

CF2 Whilst the impact of climatic change is likely to be global it is considered that its causes are mainly generated by western industrialised countries ([details of pollutants contributing to climatic change are outlined in the air pollution section](#)). As such the environmental adage used during the 1980s, of ‘think global but act local’ holds true as it is the industrialised countries that are best placed to help mitigate climatic change. The National Assembly for Wales advocates the precautionary principle.

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Climatic Factors – General

Summary of comment and any Suggested Amendment

There is general need to add more information on the need to both avoid climate change (eg through reduction in green house gas production) but also to adapt to, and mitigate for, climate change. There is also to a need to identify the interrelationships between this section and the other relevant sections such as water, biodiversity, air quality etc.

Officer Response

Climate change is a massive topic and has implications, of varying magnitude, for each and every topic covered in this report. It has been set out elsewhere in this report that there are inter relationships between most topics and it is not intended to go into these in detail. In this case it is recommended that text is included stressing that climate change effects all. It is felt that the issues of avoidance and mitigation are adequately identified in CF3 and CF4.

Recommendation

Paragraph CF1 be reworded as follows:

CF1 There is strong scientific evidence that climatic change is largely caused by man, primarily through the use of energy. The emissions of greenhouse gases are contributing to global warming and changing weather patterns. The UK Climate Impact Programme (UK CIP) has developed several different scenarios of the severity of climate change. These are based on different forecasts of increased temperature, rainfall, sea level rise etc. On the whole, research concludes that in the UK winters will become milder, wetter and stormier, whilst the summer months will become hotter and drier resulting in further incidence of drought. Further research carried out by the National Assembly for Wales and the Department of the Environment Farming and Rural Affairs has attempted to make forecasts on the impact this will have on the way we live, agriculture, vegetation and species distribution. It is clear that that there will be effects on both human health and wellbeing [and changing weather patterns which will effect every aspect of the global environment](#).

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Climatic Factors - Omission****Summary of comment and any Suggested Amendment**

The issue of the effects of Climate on human health and wellbeing should be included.

Officer Response

Agree that attention should be drawn to the potential implications on human health and well being.
Add sentence to end of paragraph CF1

Recommendation

Paragraph CF1 be amended as follows:

CF1 There is strong scientific evidence that climatic change is largely caused by man, primarily through the use of energy. The emissions of greenhouse gases are contributing to global warming and changing weather patterns. The UK Climate Impact Programme (UK CIP) has developed several different scenarios of the severity of climate change. These are based on different forecasts of increased temperature, rainfall, sea level rise etc. On the whole, research concludes that in the UK winters will become milder, wetter and stormier, whilst the summer months will become hotter and drier. Further research carried out by the National Assembly for Wales and the Department of the Environment Farming and Rural Affairs has attempted to make forecasts on the impact this will have on the way we live, agriculture, vegetation and species distribution. [It is clear that that there will be effects on both human health and wellbeing.](#)

The issues be amended by the inclusion of a new as follows:

[7. Effects on human health and well being](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Climatic Factors - Omission****Summary of comment and any Suggested Amendment**

The issue of drought should be included.

Officer Response

Agree, include within text and as an issue.

Recommendation

Paragraph CF1 be amended as follows:

CF1 There is strong scientific evidence that climatic change is largely caused by man, primarily through the use of energy. The emissions of greenhouse gases are contributing to global warming and changing weather patterns. The UK Climate Impact Programme (UK CIP) has developed several different scenarios of the severity of climate change. These are based on different forecasts of increased temperature, rainfall, sea level rise etc. On the whole, research concludes that in the UK winters will become milder, wetter and stormier, whilst the summer months will become hotter and drier [resulting in further incidence of drought](#). Further research carried out by the National Assembly for Wales and the Department of the Environment Farming and Rural Affairs has attempted to make forecasts on the impact this will have on the way we live, agriculture, vegetation and species distribution. It is clear that that there will be effects on both human health and wellbeing.

The issues be amended by the inclusion of a new indicator as follows:

[8. Increased incidence of drought](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Climatic Factors – Issues****Summary of comment and any Suggested Amendment**

Need to include likely impacts of climate change and possible adaptations to them such as drought and potential decreases in water resources. Reference should be made to the joint CCW/EAW document (Strategic Environmental Assessment and Climate Change: Guidance for Practitioners, May 2004), a copy of which has been previously supplied.

Officer Response

It is felt that these matters have been adequately addressed for the purposes of this report however reference should be made to the joint CCW/EAW guidance ‘Strategic Environmental Assessment and Climate Change for Practitioners, 2004’.

Recommendation

Amend Appendix 1 by the inclusion of the following document at the national Regional level:

[Strategic Environmental Assessment and Climate Change for Practitioners – CCW/EAW](#)

Section of Scoping Report

Chapter 6 – Baseline Characterisation - Climatic Factors – Monitoring Indicators

Summary of comment and any Suggested Amendment

The following indicators have been suggested

Living Environment

Issue	Objective	Indicator
Climate Change	To reduce the total amount of CO2 produced within the county borough each year	a-b <ul style="list-style-type: none"> • Number of businesses adopting Environment Management Systems such as Green Dragon • Percentage of developments and buildings meeting Building Research Establishment Environmental Assessment Method standards very good or excellent • Number of Ecohomes constructed
Climate Change	Reduce flood risk to people, property and maintain the integrity of the floodplain	<ul style="list-style-type: none"> • Amount of development within C1 and C2 as defined by TAN15 • Change in indicative floodplain

Regeneration

Issue	Objective	Indicator
Transport	To reduce congestion by reducing the need to travel, encourage alternatives et	<ul style="list-style-type: none"> • Number of school travel plans • Average commuting distance • Average shopping distance per trip

Officer Response

Agreed that the indicator concerning businesses adopting EMS should be included as data is held on this however the indicators proposed for BREAM and Ecohomes are not as straight forward as these accreditation systems are not as controlled. The new system proposed by the government has the same weakness'. With regard to energy efficiency of properties improvements will be forthcoming through improved building regulations. It is not recommended that the indicators relating to BREAM and Ecohomes are included.

It is felt that the proposed new Objective and monitoring indicators are adequately covered in the amended Water section which includes the indicator relating to zones C1 and C2 and the text refers to WAGs ability to change identified 'Floodplains'.

Agree to include an indicator on School Travel Plans.

At the moment comprehensive data is not available for neither commuting distances nor shopping distances per trip. Both would however be useful indicators and should such information become reliably available through comprehensive monitoring then one or both indicators should be

included. However, until this information is available it is not practical to include these indicators.

Recommendation

New indicators be included, and existing indicators re-numbered, as follows:

[c. Number of businesses adopting Environmental Management Systems.](#)

[i. Number of school travel plans prepared.](#)

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Climatic Factors – Objectives and Monitoring Indicators

Summary of comment and any Suggested Amendment

There is a general need to consider objectives/indicators relating to adapting to climate change such as water resource management (increased winter storage capacity?), flood defence, flood mitigation, building design etc. It should be clearly cross-referenced to objectives and indicators in other sections such as water resources. Indicators need to be more specific or at least be aspirational in nature.

Officer Response

These issues have been identified in the text of the document and it is felt that the range of indicators provided cover the objective sought. Whilst specific design guidance will be produced it is agreed that reference should be included to the need for adapted building design and the desire to incorporate more green technologies in both the text and as an issue.

Recommendation

Paragraph C2 be amended as follows:

CF2 Whilst the impact of climatic change is likely to be global it is considered that its causes are mainly generated by western industrialised countries (details of pollutants contributing to climatic change are outlined in the air pollution section). As such the environmental adage used during the 1980s, of ‘think global but act local’ holds true as it is the industrialised countries that are best placed to help mitigate climatic change. The National Assembly for Wales advocates the precautionary principle. [Climate change will have implications for the design of new buildings. As a result new building design should adopt green technologies as far as is practical.](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Climatic Factors – Objective 2****Summary of comment and any Suggested Amendment**

Should emphasise need for new developments to be located to minimise need to travel

Officer Response

It is agreed that the term ‘minimising the need to travel’ is the correct form, as evidenced in Planning Policy Wales. The indicator should be amended accordingly. The term implies that the actions are both reducing traffic directly and reducing the need to travel by siting development accordingly. It is not intended, therefore, to specifically include reference to the location requirements for development.

Recommendation

Objective 2 be amended as follows:

To reduce congestion by ~~reducing~~ minimising the need to travel, encourage alternatives to the car and make best use of the existing transport infrastructure

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Climatic Factors – Indicator 2c****Summary of comment and any Suggested Amendment**

Private car ownership is also seen, as one of the social wealth indices is there any potential conflict in this?

Officer Response

Levels of car ownership have a direct relationship with numbers of car borne journeys in any particular area. Whilst an increase in car ownership is an aim in addressing social exclusion, it is also a pertinent factor in the issue of climate change and the Council reaching its goals in respect of vehicle emissions. It is accepted that the success of social exclusion policy will be a negative result in respect of this indicator, but the role of the SEA/SA process is to assess policies and make recommendations for their improvement to make them more sustainable. It is entirely proper that such an indicator is included, if it is pertinent to the issues and can be readily monitored.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Chapter 6 – Baseline Characterisation - Material Assets – Baseline Information****Summary of comment and any Suggested Amendment**

More baseline information regarding the Sewerage infrastructure is required. There can be no development without sewerage capacity. It is fundamental to the concept of sustainability. The scoping report needs to emphasise this link and needs to provide baseline information. Dwr Cymru Welsh Water can supply baseline detailed information on sewerage capacities and inadequacies together with the timescales for improvements.

Officer Response

Agree. Include additional text within MA2.

Recommendation

Paragraph MA2 be amended as follows:

MA2 The majority of the settlements in the County borough were constructed over a relatively short period of time in response to the changing economy of the area which became dominated by heavy industry. Whilst these settlements were built to cater for the demands of the day the standards fall short of what is expected today. Obvious examples of this are the road and sewerage systems. The infrastructure put in as part of these developments is in many instances in need of replacement and repair and the design of settlements can make this difficult to undertake. There are no major sewage treatment sites within the County borough and there is existing capacity within the three trunk sewers serving the County. There are however likely to be localised capacity problems in specific areas due to problems with the subsidiary sewers feeding into the main network

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Material Assets

Summary of comment and any Suggested Amendment

Should be some reference to schools and education, hospitals and health (cross-reference with population section) power generation particularly renewables such as wind turbines (cross-reference to climate change and landscape) and flood defence structures.

Officer Response

It is agreed that an indication of what constitutes material Assets should be included in Baseline Characterisation.

However, The issue of cross referencing has been considered from the outset in drafting the Scoping Report. There are many issues that relate across a number of the topic areas. Cross referencing between them could lead to a significant level of duplication and over-complicate the document. Consequently it was decided that issues would be addressed in one topic area only, without cross referencing. This stance needs to be stated in the methodology to the Scoping Report to clarify the situation. An amendment to include a new paragraph relating to the issue of cross referencing has already been recommended.

Recommendation

Paragraph MA1 be amended as follows:

MA1 Material Assets are considered to be the infrastructure upon which the functioning of the County borough relies. [This includes education facilities \(including schools\), hospitals and health infrastructure, power generation \(including renewable energy\) and distribution, highway and communication infrastructure, water infrastructure \(including flood defences and utilities\).](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Material Assets – M2****Summary of comment and any Suggested Amendment**

More information is required on leakage, wastewater treatment and capacities and implied lack of burial facilities.

Officer Response

It is not intended to imply that there is a shortage of burial space within the county borough. The issue here is not the current provision but the difficulty with identifying new sites in order to implement future burial strategies. The paragraph should be amended for clarity.

There are also two paragraphs MA3, with this paragraph being the latter. Therefore the paragraph should be renumbered accordingly.

Recommendation

Paragraph MA3 (renumbered MA4) be amended as follows:

~~MA3~~MA4 The provision of recreational facilities which often take large areas of land are difficult to provide once development has taken place and there is an increasing trend to participate in recreational activities putting additional pressure on existing resources. This is also true for the provision of land and facilities for burials in terms of the location of sites and land requirements, where identifying sites to meet future strategies may be extremely difficult.

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Material Assets – Issues

Summary of comment and any Suggested Amendment

Design and improvement of development should be included eg in relation to energy efficiency and transport.

Officer Response

Agree as above. However the issue of green technologies is covered in the air pollution section

Recommendation

A new issue be included as follows:

[5. To improve the design of development](#)

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Material Assets – Objectives and Indicators****Summary of comment and any Suggested Amendment**

The objectives need to cover the concept of improving the capacities and performance of material assets. Also need to consider additional indicators for water resource management such as leakage, water metering etc and for flood defences.

Officer Response

It is felt that the concept is covered by the existing objective in so much as performance could be improved through additional capacity. Existing indicators and those proposed elsewhere in this document will provide sufficient monitoring information.

Recommendation

No amendment be made in respect of this comment.

Section of Scoping Report

Chapter 6 – Baseline Characterisation – Material Assets – Indicator 1a

Summary of comment and any Suggested Amendment

Highway improvements should not lead to night blight, increased air pollution or urbanisation of rural roads – there is a need to reconsider this indicator.

Officer Response

Whilst the concerns are shared in terms of outcomes, it is felt the issues that can be monitored are adequately dealt with elsewhere.

Recommendation

No amendment be made in respect of this comment.

Section of Scoping Report**Chapter 6 – Baseline Characterisation – Material Assets – Indicator 1b****Summary of comment and any Suggested Amendment**

need to expand this to cover wider water treatment capacity issues

Officer Response

The text refers to the baseline in amended paragraph MA2 and strategic capacity has not been raised as a problem. The proposed indicator is indicative of the magnitude of any capacity problems at a local level.

Recommendation

No amendment be made in respect of this comment.

Section of Scoping Report**Chapter 8****Summary of comment and any Suggested Amendment**

There is no mention of, or allowance for, the need to consider appropriate assessment of the plan within the process timetable. Appropriate assessment must consider implications of the LDP on all relevant Natura 2000 sites, not just those within the plan area. We strongly recommend this aspect is discussed with CCW as a matter of urgency.

Officer Response

It is agreed that an “Appropriate Assessment” of the LDP is required. It is also agreed that the Appropriate Assessment be included within the SEA/SA report. It is intended that the relevant Natura 2000 sites are referenced in this Scoping Report, along with a brief statement advising that an Appropriate Assessment is required. The assessment itself will be included in the Part 2 Environmental Report, in its own section. An amendment to modify paragraphs 1.1 and B2 relating to the issue of cross referencing has already been recommended.

Recommendation

No further amendment be made in respect of this comment.

Section of Scoping Report**Appendix 1****Summary of comment and any Suggested Amendment**

Finally, I have no comments to make on Appendix 1 other than to observe that Planning Policy Wales should perhaps be added to the section on national PPPs rather than being freestanding.

Officer Response

It is accepted that the Planning Policy Wales document (PPW) is a national level guidance document and that it could easily be included at the national/regional level in the appendix 1 document. However PPW is also the most important document in respect of the preparation of the LDP as it contains all relevant general planning policy guidance. As such it was determined that PPW would be better separated out and included in a section of its own so that it can be referenced more easily.

Recommendation

No amendment be made in respect of this comment.

Section of Scoping Report**Appendix 1****Summary of comment and any Suggested Amendment**

The main document only refers once to the Appendix 1. There are many issues raised in Appendix 1 which are vital to achieving environmental sustainability. Could I suggest that there is a clearer statement of the importance of Appendix 1. Eg perhaps a separate paragraph to highlight its links to the main document rather than a cursory mention within 6.2.

Officer Response

A reference outlining the purpose and importance of Appendix 1 should be included within the Scoping Report. This is most appropriately accomplished by making reference to the Appendix and its role and function in the introductory Chapter.

Recommendation

A new paragraph be included at the end of Chapter 1 as follows:

1.7 As part of the Scoping Report, the authority are obliged to review all relevant plans, policies and programmes (PPPs) at European, national, Regional and local levels. Relevant PPPs are those that have an effect or implication for the Council's LDP, whether directly or indirectly. The review lists all relevant documents and their implications and requirements for the development plan, as well as providing some of the background information for the Baseline Characterisation. As such it is an important tool to ensure that the development plans has addressed all of the requirements placed on it by other legislation. The PPP review has been incorporated into the Scoping Report as Appendix 1. However, the review is a very large piece of work and consequently it has been kept as a separate document in its own right, although the Appendix is available as part of the Scoping Report.

Section of Scoping Report

Appendix 1

Summary of comment and any Suggested Amendment

Under Local Level plans you may wish to include the Catchment Abstraction Management Strategy for the River Rhymney.

Officer Response

Agree.

Recommendation

Rhymney CAMS will be included in the Appendix 1 local level review of PPPs

Section of Scoping Report**Appendix 1****Summary of comment and any Suggested Amendment**

Suggest that the following, additional international ppp's should be considered as part of this assessment,

- Environmental Liability Directive 2004/35/CE - (the ELD will be transposed into UK legislation during the lifetime of this proposed plan and should therefore be taken into account in this assessment). <http://www.defra.gov.uk/environment/liability/index.htm>

Officer Response

Agreed

Recommendation

Appendix 1, European Level, be amended by the inclusion of the following

[Environmental Liability Directive 2004/35/CE](http://www.defra.gov.uk/environment/liability/index.htm)

Section of Scoping Report

Appendix 1

Summary of comment and any Suggested Amendment

Suggest that the following, additional national ppp's should be considered as part of this assessment,

- Rural Development Plan (in preparation)
- Wales Transport Strategy (in preparation)
- The Minerals TAN (Aggregates)
- Water Company Asset Management Plans (AMP)
- Flood risk management plans (FRMP)
- Drought Management Plans
- CAMS and Water Resource Plans updated/revised since Water Resources for the Future- Strategy for Wales 2001
- Turning Heads: A strategy for the Heads of the Valleys 2020
- Priority Habitats of Wales (2003)

<http://www.ccw.gov.uk/news/index.cfm?action=Press&ID=514&lang=en>

Officer Response

It is not possible to include documents that have yet to be finalised and published. Consequently only some of the documents will be included in the list at the current time. Other documents can be included in the Appendix during the course of the production of the SEA/SA and LDP, as and when they become finalised.

Recommendation

The following Documents be included in Appendix 1, national / regional level

- Minerals TAN (Aggregates)
- Water Company Asset Management Plans (AMP)
- Flood risk management plans (FRMP)
- Drought Management Plans
- CAMS and Water Resource Plans updated/revised since Water Resources for the Future- Strategy for Wales 2001
- Priority Habitats of Wales (2003)

Section of Scoping Report**Appendix 1****Summary of comment and any Suggested Amendment**

Tan 5 Nature Conservation; in addition to protected sites, CCW should be consulted on all developments likely to affect protected species. Draft TAN 5 Nature Conservation, was issued for consultation in January 2006 and updates the changes in legislation that have occurred since TAN 5 was published in 1996.

Officer Response

The above information is noted and the TAN 5 review will be amended accordingly.

Recommendation

The TAN 5 review be updated to reflect the changes brought in by the Draft TAN

Section of Scoping Report

Appendix 1

Summary of comment and any Suggested Amendment

Mention must be made to relevant UDPs, LDPs, transport plans, waste plans etc. of adjacent local authorities where these have the potential to affect the Borough.

Officer Response

Agreed

Recommendation

Appendix 1 be modified by the inclusion of relevant plans of adjoining authorities.

Section of Scoping Report**Appendix 1 - Chapter 13 Minimising and Managing Environmental Risks and Pollution****Summary of comment and any Suggested Amendment**

As a general point it is apparent that the main environmental risks are associated with flooding and flood risk management. However, there are obviously other environmental risks that would ordinarily be considered as part of a planning development in addition to flooding and these should also be considered in a section entitled 'environmental risks and pollution.'

Officer Response

The PPP review is meant to review all relevant plans, policies, programmes and identify their requirements and guidance in respect of the LDP. It is not the role of the PPP review to provide interpretation of the guidance contained in the documents it reviews, that role is appropriately exercised in the development plan and planning application processes. In this instance the information has been relayed in the same layout and format as the original document. As such it would not be prudent to rearrange part of the review to follow what is a more realistic form, as the remainder of the review has been provided on the basis of the layout of the original guidance document.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Appendix 1 - Chapter 13 Minimising and Managing Environmental Risks and Pollution****Summary of comment and any Suggested Amendment**

PAGE 60: the sixth bullet point on this page makes a requirement to ‘take into account the nature, scale and extent of contamination which poses a risk to health within preparation of policy. New development shouldn’t be undertaken without an understanding of the risks and without appropriate remediation. Consideration must be given to the potential impacts which remediation of land may have upon the natural and historical environments’.

- It is assumed although not stated that the second sentence regarding ‘new development....etc’ is referring to human health rather than environmental issues. From a EAW perspective we would want consideration through the planning process of the need to ensure that development is not undertaken without also considering the risks to the local environment in addition to human health.

Officer Response

The requirements of Planning Policy Wales are quite clear in this respect and the requirement has been appropriately transcribed. The PPP review should not seek to interpret the advice as this is the remit of development plan and planning applications processes. It is accepted that impacts should be related to both environmental and public health concerns, however the review is not the vehicle to provide this interpretation.

Recommendation

No change be made in respect of this comment

Section of Scoping Report**Appendix 1 - Chapter 13 Minimising and Managing Environmental Risks and Pollution****Summary of comment and any Suggested Amendment**

Page 61: The second bullet point of the report states a requirement to ‘consider the effects which the development may have on air or water quality and the effects which air and water quality may have on proposed development.’

- It is assumed, although not stated that with respect to water quality this means both surface and groundwater quality? This section needs further consideration and rewording as required.

Officer Response

The bullet point is a direct quote from Planning Policy Wales. It is not the role of the PPP review to provide interpretation of the guidance contained in the documents it reviews, that role is appropriately exercised in the development plan and planning application processes. It is accepted that, in this instance, water relates to both surface and ground water, but the review is not the appropriate vehicle to provide this interpretation.

Recommendation

No change be made in respect of this comment.

Section of Scoping Report**Appendix 1 - Chapter 13 Minimising and Managing Environmental Risks and Pollution****Summary of comment and any Suggested Amendment**

Page 61: The third bullet point makes a requirement to ‘take account of quality objectives’. However, no further elaboration is provided on what specific water quality objectives are being referenced to here.

- This requirement should be either reworded or removed as at present it does not seem to refer to any specific ‘quality’ objectives human or environmental.

Officer Response

The bullet point is a direct quote from Planning Policy Wales. It is not the role of the PPP review to provide interpretation of the guidance contained in the documents it reviews, that role is appropriately exercised in the development plan and planning application processes. It is accepted that, in this instance, the objectives are not specifically defined, but the review is not the appropriate vehicle to provide this information.

Recommendation

No change be made in respect of this comment.

Section of Scoping Report**Appendix 1 - Chapter 13 Minimising and Managing Environmental Risks and Pollution****Summary of comment and any Suggested Amendment**

Page 61: The fifth bullet point states a requirement to ‘make realistic provisions for the types of industry or facility that might be detrimental to amenity or conservation interests, or a potential source of pollution’.

- It is not particularly understood how this requirement meets the stated objective to ‘prevent or manage pollution and promote good environmental practice’. We would be grateful for further comment to be provided on this point. We would stress that any provision for any development must also make an appropriate consideration of the risks posed from that development to environmental issues, including for example surface and groundwaters present both at and in the vicinity of a site.

Officer Response

The bullet point is a direct quote from Planning Policy Wales. It is not the role of the PPP review to provide interpretation of the guidance contained in the documents it reviews, that role is appropriately exercised in the development plan and planning application processes.

The review, whilst forming part of the Scoping Report, is not part of the Baseline Characterisation and as such does not have to be in accordance with sustainability objectives identified there. In fact one of the roles of the review is to identify where there are inconsistencies between relevant plans, policies, programmes and the development plan itself (or even the SEA/SA).

Recommendation

No change be made in respect of this comment.

Section of Scoping Report**Appendix 5****Summary of comment and any Suggested Amendment**

It should be made clear which of these species are covered by SEA indicators/objectives or is the intention to use the LBAP as a whole? Whichever option is chosen the indicators must be reactive/relevant to the LDP and measurable at the local level.

Officer Response

Whilst it would be desirable to use all the identified species for monitoring purposes it is unlikely that this will occur and monitoring is likely to be limited to those species identified with an asterix. Any additional monitoring will be a bonus.

Recommendation

Appendix 5 be amended by the addition of the following text at the foot of the table:

[The important species, above, are highlighted with an asterix. It is the intention to monitor the important species only. However, should monitoring of any of the other species listed above be undertaken, this information will be also be utilised.](#)

Section of Scoping Report**Appendix 6****Summary of comment and any Suggested Amendment**

Are all these sources of relevance to Caerphilly? It should be made clear where the information source gives Caerphilly specific data and where the data has been extrapolated from a wider data set (such as the reference to the BBC news website).

Officer Response

Appendix 6 provides the references for the information that comprises the baseline information for the Scoping Report. It was not considered appropriate to include all relevant information within the Scoping Report itself in order to keep the Scoping Report as concise and comprehensible as possible. Therefore only source references have been provided. It is agreed that some information relates to a national scale, whilst others relate to the county borough and some to areas within the county borough. However there seems to be little benefit in identifying what level the information is at for each resource as this would again result in this part of the document becoming unwieldy. Consequently it is not proposed to include this information.

Recommendation

No amendment be made in respect of this comment

Section of Scoping Report**Appendix 6****Summary of comment and any Suggested Amendment**

Suggested Additional references:

Air Pollution

Air Pollution Information System: www.apis.ac.uk/home.html

Biodiversity

South East Wales Environmental record Centre (SEWBReC): www.sewbrec.org.uk

Biodiversity Action-plan Reporting System (BARS): www.ukbap-reporting.org.uk/

CCW site monitoring: WWW.CCW.gov.uk

Officer Response

The suggested reference will be included in the Appendix

Recommendation

Appendix 6 be modified by the following additions

Air Pollution

B11 [Air Pollution Information System: www.apis.ac.uk/home.html](http://www.apis.ac.uk/home.html)

Biodiversity

F4 [South East Wales Environmental record Centre \(SEWBReC\): www.sewbrec.org.uk](http://www.sewbrec.org.uk)

F5 [Biodiversity Action-plan Reporting System \(BARS\): www.ukbap-reporting.org.uk/](http://www.ukbap-reporting.org.uk/)

F6 [CCW site monitoring: www.ccw.gov.uk](http://www.ccw.gov.uk)