

DEPOSIT LOCAL DEVELOPMENT PLAN UP TO 2021

STRATEGIC ENVIRONMENTAL ASSESSMENT/SUSTAINABILITY APPRAISAL PART 2

Environmental Report
Non-technical Summary

October 2008

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Strategic Environmental Assessment/Sustainability
Appraisal of the Caerphilly LDP

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Overview

1 Caerphilly County Borough Council (CCBC) is required to carry out a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of its Local Development Plan (LDP). This Non-technical Summary summarises the Sustainability Appraisal and Report.

2 The purpose of the SEA/SA is to support sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. The SEA/SA seeks to identify and report upon the likely significant effects of the Local Development Plan and the extent to which it will achieve the social, environmental and economic objectives by which sustainable development can be defined.

The Caerphilly Local Development Plan 2006-2021

3 In accordance with the Planning and Compulsory Purchase Act 2004 CCBC is developing its LDP, comprising of a set of planning policy documents which will, when adopted, replace the existing Unitary Development Plan.

Caerphilly SEA/SA

4 SEA is a requirement set out in a European Directive, commonly referred to as the SEA Directive. The aim of the SEA Directive is “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development” (Article 1). These aims are consistent with a range of WAG policies on the environment and sustainable development.

5 The SEA Directive defines “environmental assessment” as a procedure comprising:

- ◆ Preparing an Environmental Report on the likely significant effects of the draft plan or programme;
- ◆ Carrying out consultation on the draft plan or programme and the accompanying Environmental Report;
- ◆ Taking into account the Environmental Report and the results of consultation in decision making; and
- ◆ Providing information when the LDP or programme is adopted and showing how the results of the environmental assessment have been taken into account.

6 The Planning and Compulsory Purchase Act 2004 is the latest in a line of primary legislation that requires Local Planning Authorities (LPA) plans to undergo a Sustainability Appraisal. This process reviews the policy options against a set of criteria reflecting local problems and the LPAs objectives in delivering sustainable development and sets out how these concerns can be addressed.

7 SA is an iterative process that identifies and reports on the likely significant effects of the LDP and the extent to which implementation of the LDP will achieve the social, environmental and economic objectives by which sustainable development can be defined.

8 SEA is focused primarily on environmental effects, with the Directive defining the environment broadly, including for example population, human health, cultural heritage and material assets as well as biodiversity, air, water and soil in the definition. SA goes further by requiring examination of the social and economic effects of a plan.

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- 9 Positive as well as negative effects should be considered, and uncertainties about the nature and significance of effects should be noted. Further to this the assessment should identify the likelihood of secondary, cumulative and synergistic effects in addition to the duration or permanence of these effects.
- 10 Government Guidance recommends the SEA Environmental Report be included within the SA Report covering effects other than those on the environment. The SA Report clearly shows the Directive's requirements in relation to the Environmental Report have been met through sign-posting the places where the information required by the SEA Directive is provided.
- 11 Listed below are the documents that comprise the SEA/SA process. Scoping Report
- 1) Document 1 - The Scoping Report
 - 2) Document 2 - The Review of Relevant Plans, Policies and Programmes
 - 3) Document 3 - The Assessment of the Preferred Strategies
 - 4) Document 4 - The Environment Report
 - 5) Document 5 - The Habitats Regulations Assessment of the LDP
- 12 The Scoping Report has considered links to other plans and strategies and uses the Caerphilly Community plan as its building block, with issues and objectives being identified by community plan theme linked to SEA/SA topic with the appropriate social, economic or environmental field being shown. The report also identifies key targets for the LDP to achieve as how and who should monitor. In accordance with the SEA procedural requirements the council sought comments on the scoping report from the 3 statutory bodies for SEA, Cadw, Environment Agency (Wales) and the Countryside Council for Wales. This was a 5-week process between 14 June 2006 - 19 July 2006. The scoping report, as revised in respect of the comments from the statutory consultees, was the subject of general public consultation between 18 April 2007 - 30 May 2007 as part of the pre-Deposit Consultation process on the LDP.
- 13 In order to assist the process, by providing the necessary expertise and access to information, a formal advisory group was established, called the Sustainability Group. This Group included experts from both the public and private sector for each of the topic issues set out in the SEA Directive. The Group have been actively and enthusiastically involved throughout the whole process, guiding and supporting each stage. There are 31 nominal members of the Sustainability Group.
- 14 In conjunction with the Sustainability Group, the council identified some 80 key issues facing the environment of the county borough, and these were combined to form 25 strategic sustainability objectives. The sustainability objectives form the basis of the assessment processes and also provide targets for monitoring purposes. The sustainability objectives have been identified as follows:
- 1) To reduce the average resource consumption of each resident
 - 2) To improve the condition of housing and ensure the range of housing types are accessible to meet the needs of residents.
 - 3) To reduce the incidence of crime
 - 4) To improve educational achievement
 - 5) To allow equal opportunities for all
 - 6) To increase the percentage of people of working age in employment

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- 7) To increase the wealth of individuals in CCBC
 - 8) To ensure a sufficient range of employment sites are available
 - 9) To improve the health of individuals
 - 10) To retain the population of county borough to at least current levels and attain a more balanced demographic structure?
 - 11) To allow all residents easy access to leisure facilities
 - 12) To reduce air, noise, light and odour pollution and ensure air quality improves.
 - 13) 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.
 - 14) To protect the cultural identity of the county borough
 - 15) To protect and enhance important historic assets
 - 16) To protect aquifers and improve the quality and quantity of the water in our rivers and to reduce water consumption
 - 17) To minimise the number of developments affected by flooding
 - 18) To make the most efficient use of land and to reduce contamination and safeguard soil quantity, quality and permeability.
 - 19) To protect geologically important sites and improve their accessibility
 - 20) To reduce the amount of waste produced and increase the reuse of materials
 - 21) To enhance the biodiversity of the county borough
 - 22) To reduce the total amount of CO₂ produced within the county borough each year
 - 23) To reduce congestion by minimising the need to travel, encourage alternatives to the car and make best use of the existing transport infrastructure.
 - 24) To increase the proportion of energy gained from renewable sources.
 - 25) To improve the performance of material assets within the county borough
- 15 The sustainability objectives encompassed the main threats to the environment of the county borough, but in themselves were not set at the appropriate level to assess either the strategy elements or the detailed policy of the LDP. The first part of the assessment process requires the assessment of the alternative strategies for the LDP. To do this questions, to be asked against the strategies, were developed from the sustainability objectives, the questions being termed assessment tests. 20 assessment tests were identified at the Strategy level and were applied to each of the 4 alternative LDP strategies. The results of this process are included in the SEA/SA Document 3.
- 16 The 'preferred' strategy was identified as being the second most sustainable strategy and in light of the group recommendations was amended to improve its overall sustainability. Following these amendments this became the strategy around which the local development plan was produced.
- 17 It was recognised early in the process that the broad nature of strategic objective analysis would need to be expanded in order to for meaningful analysis of the detailed policies and proposals of the LDP. To accommodate this the 25 objectives were broken down into 80 assessment tests. Each strategy Policy (Policies that directly implement the strategy), countywide policy (development control policies) and allocation policy (site specific Policies) were assessed using these to provide an outcome and possible recommendations as to

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how the policy could be improved. As the process is iterative, version 3 of the LDP was assessed and again at version 8, where policies were considered to require this.

- 18 The assessment process for the allocations policies differed from the others as the policies contained a policy element, representing the principle of the use of the land, and specific land allocations, which have localised effects. Consequently the assessment tests were applied over two stages. Firstly the principle of the allocation policy was assessed and the site-specific assessment tests were identified. The much-reduced number of site-specific assessment tests were then applied to each individual allocation, which total in excess of 500 sites.. The allocations themselves had already been the subject of assessment in terms of landscape, highways and biodiversity the LDPas part of the LDP preparation process. This has assisted greatly in realising few allocations that have any significant adverse impacts.
- 19 The assessment of the probable significance of the proposals contained in the Local Development Plan and how these achieve or support each of the 25 objectives in the SA Framework are summarised below. The summary covers the strategy, policies and allocations but further details of each will need to be checked in the main documentation.
- 1 To reduce the average resource consumption of each resident:**
- 20 The LDP helps address this issue through a range of measures, which seek to ensure vibrant service and local employment. Much will be dependant upon resident's lifestyles and the proximity of major urban centres, including Cardiff, which will always be a threat to achieving this objective. However, recognising this, the LDP encourages non-private vehicle modes of transport through improved provisional facilities, notably for rail to access these. The underlying theme of the strategy is to build upon the role and function of the hierarchy of settlements in the county borough and this should also assist in meeting the objective through allocations.
- 21 A second area which the LDP helps meet the objective is through policy CW1 which sets new standards for the construction and design of new buildings, resulting in reduced resource use in both construction and use there after.
- 22 Encouragement for the provision and use of renewable energy and improved waste management will help in ensuring that those resources that are used are more sustainable. There are potential threats to the landscape from this.
- 2 To improve the condition of housing and ensure the range of housing types are accessible to meet the needs of residents:**
- 23 Improved housing condition is likely to arise primarily from increased inward investment from the private sector resulting from an improved environment and perceptions of the area.
- 24 The range of housing is likely to be met through a combination of policies SP16 and SP17, which provide for both population growth within the county borough and a provision of affordable dwellings. The provision of 8625 dwellings is largely dependant on the private sector and this will also then determine the rate at which the identified 1360 affordable homes are provided. As such there are market risks. The allocations are however spread throughout the county borough and based upon the role and function of settlements, which will aid their sustainability. The affordable housing obligations are targeted at both larger developments and areas of greatest need.
- 25 There are a number of housing allocations that are identified as having elements of negative effects on the environment, these being spread throughout the county borough. Of the 78 allocated housing sites 14 are assessed as having a negative impact for a range of

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issues including increased need travel, effects upon congestion, impact on Air Quality Management Areas, flood risk and damage to the landscape or biodiversity. The use of design briefs and consideration of detailed design should mitigate these concerns.

3 To reduce the incidence of crime:

- 26 Many of the opportunities to reduce both the incidence and fear of crime are matters relating to detailed design. Whilst not being specifically addressed under policy CW5, there is the potential to use this in order to ‘design out crime’. Strategy Policy SP5 specifically aims to achieve crime reduction through designs being in accordance with best practice in terms of designing out crime. In the past there have been issues of conflict between such designs and the sustainability of developments.

4 To improve educational achievement:

- 27 The LDP makes provision for this through the direct provision of sites for new schools. As education is a life long experience the provision of additional community facilities will help facilitate this objective as will the range of employment and implied training opportunities and ‘outdoor’ provisions.

5 To allow equal opportunities for all:

- 28 This is largely delivered through the individual allocations within the LDP, which spreads development throughout the county borough dependent upon the role and function of each settlement. This applies to housing, particularly through the affordable housing element, making key employment facilities and services available to those without access to a car, increasing and enhancing leisure provision, providing a range of community facilities and thorough detailed design. Rural areas have flexible and protectionist policies to safeguard facilities and Policy CW20 specifically addresses Gypsies and Travellers.
- 29 The LDP seeks to encourage ‘mixed’ communities with adequate accessible facilities within each. Policy CW2 seeks to address, accessibility and social inclusion whilst policy CW20 sets criteria for housing for people in need of care.

6 To increase the percentage of people of working age in employment:

- 30 The LDP makes provision for over 100 hectares of employment land and is supplemented by Policy SP19, which encourages commercial developments. The spread of these sites, many of which are in easily accessible locations, should encourage people into local work rather than seeking employment beyond the county borough. Further to this the sites will offer a range of employment types. To meet the objective the LDP seeks to retain existing employers and attract new through the county borough being an attractive and vibrant area. Economic fluctuations could be a threat however a more diversified economy may help to protect against this.
- 31 In addition to identified employment and commercial development the LDP contains a policy relating to farm diversification, helping to protect and encourage employment in rural areas. Efforts to secure the vitality of town centres, through a sequential approach, are considered to be beneficial in the longer term for job creation.

7 To increase the wealth of individuals within the county borough:

- 32 Whilst not specifically addressed within the LDP it is implicit that increased employment will generate greater wealth for those gaining employment. The quality and range of employment sites may attract upper end inward investment generating more highly paid employment.

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33 The ability to work and live within the county borough through the provision of a range of services and facilities will reduce travel and other costs and should allow greater disposable income for residents.

8 To ensure a sufficient range of employment sites are available:

34 Employment sites are spread throughout the county borough with the Oakdale development being one of the largest employment development sites in South Wales. The provision of over 100 hectares of employment land and the diversity of sites contained within this should meet the above objective. The quality and accessibility of many of these sites should encourage inward investment.

9 To improve the health of individuals:

35 The major health provision within the county borough is the new hospital at Ystrad Mynach which has been identified as having some environmental dis-benefits, notably in terms of transport and location on a floodplain. It will, however, provide enhanced facilities. The provision of enhanced community and leisure facilities should have the longer-term effect of improving peoples' health both physical and mental. In particular a wide range of outdoor facilities, promoting active lifestyles are either proposed or protected.

36 The housing allocations should result in an improved housing stock, which will be significantly beneficial to the health of occupants. Reducing pollution particularly through the removal of on-road traffic at congested areas, either through improved public transport or road improvement schemes, should also result in long term health benefits. A pleasant environment, as the LDP seeks to protect and enhance, has also been shown to have significant health and well being benefits.

10 To retain the population of the county borough to at least current levels and attain as more balanced demographic structure:

37 The LDP makes provision for a population growth of 6,200 in order to support the role and function of the county borough and its settlements. This will be accommodated through the allocation for housing and employment in addition to a range of facilities and services provided. The population growth will, on the one-hand, put additional strain on the environment if achieved and, on the other, put additional strain on existing services if it is not. Should population increase but employment and service provision continue to be obtained outside the area this would result in an increasingly non-sustainable scenario. Improved ranges in terms of services, facilities, employment and housing, coupled to enhanced transport seek to ensure that key facilities, in particular, remain in the county borough.

11 To allow residents easy access to leisure facilities:

38 Policies CW10 and CW11 protect existing leisure and community facilities, whilst policies SP14, SP15 and SP7 will result in additional leisure facilities. These are dependent upon both public and private sector provision. This helps ensure that existing provision is maintained and new facilities are provided to meet the needs of the inhabitants of new developments. As provision is both targeted to areas of under provision and the role and function of settlements this will result in improved accessibility. New developments will meet the needs of 'new' residents.

39 The types of provision cover both formal and informal recreation, ranging from new leisure centre provision to natural open space and the widespread recreation and landscape opportunities that will result from implementation of the valleys regional park, Policy SP14.

12 To reduce air, noise, light and odour pollution and ensure air quality improves:

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- 40 Noise and odour pollution are largely covered by legislation, lying outside the remit of the LDP, but were considered throughout the assessment process. The LDP has taken particular note of air pollution and the policies aimed at reducing congestion and private vehicle usage coupled to more sustainable building standards, the air quality management area of central Caerphilly and proposed area of Blackwood, have been considered in terms of wider development impacts and several housing and employment allocations have been identified having likely negative effects.
- 41 There are a wide range of locational and design policies e.g. CW16 –CW23, CW1 and CW4 that aim to limit the effects of the above. Policy SP4 sets out the settlement Strategy, identifying the role and function of settlements, whilst SP5 constrains most development within or adjacent to existing settlements, limiting light and air pollution.
- 42 The issue of buffer zones for quarries helps protect quality of life of residents from pollution. Policy WM1, the proposal for waste management at Cwm Bargoed, has been identified as having potential pollution impacts in terms of all the issues identified in the objective. In addition to the direct protectionist policies, the individual design of allocations and infrastructure provision will ensure pollution does not take place or is mitigated against.
- 13 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:**
- 43 The LANDMAP methodology has been used to identify the most important landscapes in the county borough and these are protected under the VILL (NH2) and SLA (NH1) policies. Whilst these limit types of development that can take place, changing agricultural practices and the effects they may have lie largely beyond the scope of the LDP. These designations cover over two thirds of the county borough.
- 44 The protection of local landscapes promotes a sense of belonging whilst improved access to the countryside, notably through the development of Countryside Recreation SP12 and the valleys regional Park SP13, will be of significant benefit.
- 45 The LDP does not directly address the issue of maintaining a clean environment beyond those measures identified under pollution and water. Design considerations and policy CW9 will help protect urban landscapes.
- 14 To protect the cultural identity of the county borough:**
- 46 The culture of the county borough is always changing. However the LDP seeks to protect traditions through the provision of a range of cultural and leisure facilities in addition to protection and promotion of rural areas. Provision relates to educational establishments, including libraries and Welsh medium schools, protection of buildings and landscapes, sporting leisure and community facilities.
- 15 To protect and enhance important historic assets:**
- 47 Whilst many of these are protected under statute, e.g. Scheduled Ancient Monuments, Listed Buildings and Conservation Areas, the LDP also identifies sites included in historic parks, gardens and landscape registers and provides protection through LANDMAP and development control policies. Several of the most important historic assets within the county borough are significant tourist attractions which can have both positive effects on the site but wider environmental disbenefits in terms of increased pollution, litter etc. Policies relating to design and in particular the settings and context of development should be beneficial.

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16 To protect aquifers and improve the quality and quantity of water in our rivers and to reduce water consumption:

48 New developments will require additional water resources. However policy CW1 seeks to maximise water saving methods. Water is a valuable resource and new development should seek to source water from existing sources which would not adversely impact further on the environment. The use of more sustainable drainage systems will help protect both the quality and quantity of water within the county borough's rivers. Limiting the amount of urban run off will help save the chemical and biological quality of rivers whilst improvements to infrastructure may lead to improvements. Design considerations and site briefs can assist in meeting both quality and quantity and the protection of leisure and open spaces will be of benefit will be of benefit.

17 To minimise the number of developments effected by flooding:

49 Only in exceptional circumstances or where development is in accordance with national guidance, is development allocated within zone C of the flood plain, effectively minimising the number of developments.

18 To maximise the most efficient use of land and to reduce contamination and safeguard soil quality, quantity and permeability:

50 The strategy seeks to maximise the use of previously used sites and includes land reclamation schemes within this, some of which are contaminated. This has the benefit of allowing the restoration of soils, including permeability.

51 The allocations, beyond those included within existing urban areas or brownfield sites have sought to avoid the best quality agricultural land. This is achieved through the settlement boundary SP5.

52 There are some conflicts in terms of accessibility of some of the sites that are to be reclaimed; however in order to allow reclamation and associated benefits a range of uses are required.

19 To protect geographically important sites and improve their accessibility:

53 Policy CW8 seeks to protect the natural heritage of the county borough including geologically important sites. Countryside recreation policies and proposals coupled to the opportunities that will arise through the valleys regional park should improve both accessibility and understanding of these sites.

20 To reduce the amount of waste and increase use of materials:

54 Policy CW1 addressed issues of sustainable design and construction seeking significant increases in the reuse of materials from current levels. This is likely to be assisted by the proposals for a waste management facility, Policy WM1, which will be of benefit in terms of site materials.

21 To enhance biodiversity of the county borough:

55 Strategy Polices SP2 and SP3 seeks to protect natural heritage in the northern and southern connections corridor but the issue is not identified in the Heads of the Valleys Regeneration Area. It is considered that the strategy policies relating to place making SP6, natural heritage protection SP12 and SP20 natural green space will provide sufficient protection to cover this omission.

56 Design Policy CW5 provides opportunities for biodiversity enhancement whilst an additional policy CW9 provides protection and mitigation for trees and woodlands, which are valuable habitats in their own right.

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- 57 Whilst policy NH3 identifies and protects some 180 Sites of Importance for Nature Conservation there remains the issue of connectivity between habitats. Individual site appraisals and the opportunities to enhance/create sites both within and outside development site boundaries offer significant potential to ensure that wildlife corridors are retained or improved.
- 58 The Aberbargoed Special area of Conservation has been subject to specific independent appraisal due to the requirements of the Habitats Regulations. This study concluded that the LDP was unlikely to have a significant effect on the Aberbargoed site or those protected sites beyond the County Boundary. In the analysis the LDP is considered to offer strong protection of biodiversity of the county borough.
- 59 It should be noted that a screening exercise of potential sites had been undertaken prior to the sites being recommended within the LDP. Sites do remain which will have detrimental effects on biodiversity but these are outweighed by those that have potential to promote biodiversity.
- 22 To reduce the total amount of CO₂ produced within the county borough each year:**
- 60 The settlement strategy coupled to improvements in building design and construction, the design of highways (CW6), sustainable transport, accessibility and social inclusion (CW2), the promotion and provision of public transport and the requirements for new development to incorporate both energy saving and renewable energy technologies, will help meet this objective. It is, however, dependent upon the issue of new facilities and the life-style habits of residents, particularly in terms of car usage. Improved road infrastructure coupled to existing low ownership rates may prove a threat to this objective if car usage increases. On balance it is felt that the range of opportunities to reduce CO₂ emissions will exceed the increased emissions due to population and employment growth.
- 23 To reduce congestion by minimising the need to travel, encourage alternatives to the car and make the best use of existing transport infrastructure:**
- 61 Policies SP21 and SP22 set out a hierarchal approach to transport provision with the emphasis being on non car borne transport. Whilst highway improvements are proposed, these seek to reduce congestion, although a side effect maybe to increase car use. SP21 specifically targets air quality management areas.
- 62 Policies aimed at the role and function of settlements seek to reduce the need for residents to travel outside the county borough for employment or other reasons. Alternative transport provision is proposed by improvements to the walking and cycling network and a new passenger rail link with enhanced facilities on the existing network. These are likely in the longer term to be significantly beneficial. There are also transport requirements for developers to meet both on and off site, which seek to improve and make best use of the existing network whilst also encouraging non-car use. Policy CW2 promotes travel by modes other than the car and encourages green travel plans for certain developments. Design and locational constraint polices further the objective. Whilst provision can be made any reduction remains dependent upon residents utilising the opportunities and provision will largely be made in step with development. Proposals including provision for private transport tend to score badly even in terms of design assessment, e.g. CW5 of version three. However it should be noted that there are no major new road proposals in the LDP.
- 24 To increase the proportion of energy gained from renewable sources:**
- 63 The LDP does not allocate specific sites for renewable energy generation but does, through policy SP10, require new developments to embrace both energy saving and renewable

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energy technologies, setting phased targets to achieve or exceed government commitments. Certain forms of both renewable and non-renewable energy generation may have negative effects on landscape or biodiversity and it is recognised that mineral resources, including coal, require protection. Fossil fuel usage has, however, become more efficient.

25 To improve the performance of material assets within the county borough:

64 The strategy seeks to consolidate and improve on existing facilities including town centres. New developments are required to make provision where necessary, to upgrade infrastructure provision in terms of assets such as sewers, roads and leisure provision to ensure the network does not become overloaded.

65 Allocations, particularly in terms of housing and employment are located, where possible, near transport nodes with capacity in the network. Telecoms apparatus is required to make the most efficient use of existing infrastructure so as to fit in with the environment.

Trans-boundary Effects

66 It was found that there would be no significant trans-boundary environmental effects that would require consultation with other member states of the European Union.

Mitigation

67 Mitigation measures are aimed at avoiding and reducing any unwanted environmental effects that may result from the implementation of the LDP. Mitigation will be primarily achieved through two means, the application of policies across the whole plan to all developments and through the use of detailed design briefs. The strategy is based upon principles of sustainable development giving weight to environmental, economic and social issues. The environmental effects were found to be fully mitigated and no significant policy gaps were identified.

Monitoring and Review

68 The initial monitoring programme for the LDP sets out over 80 indicators and targets covering the issues set out in the sustainability objectives. Data gathering and monitoring will be undertaken by a range of organisations and used to assess both the effectiveness of the LDP and of the indicators themselves. The majority of monitoring is capable of being undertaken on at least an annual basis.

69 The SEA/SA will be reviewed in line with the LDP reviews, on a 5 yearly basis. Should elements of the monitoring programme need amendment, this should be undertaken throughout the process as the identified programme should be considered the starting point.

Assessment of the LDP under the habitats Directive and Regulations.

70 The European Commission requires that the LDP considers the likely effect it will have on internationally designated wildlife sites both within and beyond the county borough. A number of such sites exist in adjacent authorities and one, Aberbargoed Grasslands Special Area of Conservation (SAC), within the county Borough.

71 A firm of Consultants, Enfusion, were appointed to undertake the HRA and found that there would be no significant effects on potential sites beyond the county borough. With regard to Aberbargoed, given the mitigation and management proposals the LDP would have no significant effect although some recommendations concerning drainage were made to ensure ecological integrity.