

**REPRESENTATION DETAIL** by: Representation No

**Rhondda Cynon Taf County Borough Council Local Development Plan**

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
<b>59.E1</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
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Item	Question	Representation Text
1	Representation Text	<p>Representation to SA of Area Wide Policies Page No. 33 Para No. 5.30</p> <p>The extraction of coal does NOT contradict the objective to reduce carbon emissions and minimise the impacts of development on climate change. The transport of imported coal results in carbon emissions of between 4% and 9% of the emissions from burning it. The transport of indigenous coal results in carbon emissions of only 0.1% of the emissions from burning it.</p> <p>It follows from this that as long as coal is burned in Wales, extracting it in Wales represents THE LOWEST CARBON OPTION OF THE AVAILABLE ALTERNATIVES.</p> <p>With respect to the burning of coal, both National policy and the policy of the Welsh Assembly Government envisage the continued use of coal for electricity generation as an essential contribution to security of supply. The policy of both the UK Government and the Welsh Assembly Government is to encourage the development of technologies to minimise carbon emissions from the burning of coal on climate change grounds. In neither case is the policy opposed to the burning of coal on climate change grounds.</p>
2	Changes Sought	<p>The second sentence of para. 5.30 is simply incorrect as well as being both naive and superficial. Either the sentence should be deleted or it should be extended and qualified to reflect:-</p> <p>(i) Energy policy both for the UK and for Wales recognises the contribution made by coal to security of supply and encourages the development of clean coal technology; and</p> <p>(ii) The fact that whilst ever coal is consumed in Wales, extracting it within Wales as opposed to importing it represents THE lowest carbon option of the available alternatives.</p>

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<b>1632.E1</b>			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
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Item	Question	Representation Text
1	Representation Text	
	1.14 - Sustainability Appraisal Work to Date	
	CCW note that within the list of consultee responses listed in appendix 2 of the SA Report (covering both the scoping and preferred strategy consultation) only the CCW response to the monitoring and indicators consultation is included. CCW responded to both the previous consultations and included a number of comments of significant concerns regarding the assessment process, particularly the application of the process to the Strategic Options and Policies. For example, in our response of 20 February 2007, we highlighted our concerns about the level of detail in what is now table ii in appendix V and the conclusions that have been drawn from fairly generic statements, such as in the built environment section, the statements in the final two columns are very similar and yet the conclusions are different. This is still the case and no justification has been given. Similarly in we raised a number of significant concerns with the strategic policies appraisal, including the different conclusions drawn for polices with very similar overall effects (for example, SP1 and 2 on water objective) and the very similar statements of effects arriving at different conclusions for impacts (for example, assessment for Biodiversity under SP 1 and 2).	
	There may be genuine reasons, identified through the appraisal process itself, for these differences, but without a clear justification it appears that our concerns remain unanswered and, therefore, must remain.	
2	Changes Sought	
	Table ii, Appendix V. Clear justification is required where different conclusions are drawn from very similar statements.	

<b>1632.E2</b>			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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Item	Question	Representation Text
1	Representation Text	
	1.15 - Habitats Regulations Assessment (HRA)	
	CCW welcome the production of the HRA for the RCT LDP. While the HRA is a separate document, it should be noted that it feeds directly into the plan where relevant and any findings or conclusions from the HRA process should be incorporated within the SEA and the LDP itself where appropriate.	
2	Changes Sought	
	Any findings or conclusions from the HRA process should be incorporated within the SEA and the LDP itself where appropriate.	

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<b>1632.E3</b>			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:	
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Item	Question	Representation Text
1	Representation Text 3.0 Sustainability Context and Objectives 3.2 – Review of relevant Plans (Policies) and Programmes (PPPs). We note that the list of plans, policies and programmes contained in appendix II is a limited selection. While we appreciate that the wide selection of PPPs considered during the scoping stage will have varying degrees of relevance to the RCT LDP, the restricted list contained in the SA report goes some way to explain why the list of key issues and opportunities listed in 3.3 does not include climate change adaptation and mitigation measures, conservation of water resources, the health benefits from access to a quality environment, improving air quality etc.	
2	Changes Sought We would wish to see a full list of all PPPs considered in the SA development process with a rationale why some have not been considered beyond the scoping stage included in the final Environmental Report.	

<b>1632.E4</b>		<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
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Item	Question	Representation Text
1	Representation Text 3.0 Sustainability Context and Objectives 3.11 - Sustainability Characteristics and Issues · Environment. There area number of designated sites within the RCT plan area, however, we would wish to see some qualitative justification for the statement that RCT has a “large amount of land designated for nature conservation protection” in terms of percentage land cover/comparison with neighbouring local authorities. This is particularly important as it is used a number of times within the assessment to justify why identified negative impacts or additional mitigation measures are not being considered further in the evaluation. · Culture – in addition to a rich historical heritage and some outstanding LANDMAP aspect area assessments RCT also has two landscapes of special historic interest (The Rhondda itself and part of East Fforest Fawr and Mynydd-y-Glog). While these are not statutory designations they are material considerations and should have been considered in the baseline data evaluation.	
2	Changes Sought We would wish to see some qualitative justification for the statement that RCT has a “large amount of land designated for nature conservation protection” in terms of percentage land cover/comparison with neighbouring local authorities.  Landscapes of special historic interest (The Rhondda itself and part of East Fforest Fawr and Mynydd-y-Glog) should have been considered in the baseline data evaluation.	

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<b>1632.E5</b>			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
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Item	Question	Representation Text
1	Representation Text 3.0 Sustainability Context and Objectives 3.12 – Key Sustainability Issues This issues identified in this section seem to be effectively setting out the scenario of what would happen in the absence of the plan. If this is the case, it should be noted within the text as it is one of the elements that you correctly identify later in the document as being a requirement of the SEA regulations. We would also expect, therefore, issues such as the “continuing decline in key biodiversity indicators” to be included and “Natural Heritage” to be added to “cultural and historical” in the bullet point identifying increasing development on unprotected sites.	
2	Changes Sought 3.12 – Key Sustainability Issues: This issues identified in this section seem to be effectively setting out the scenario of what would happen in the absence of the plan. This should be noted within the text.  Issues such as the “continuing decline in key biodiversity indicators” to be included, and “Natural Heritage” to be added to “cultural and historical” in the bullet point identifying increasing development on unprotected sites.	

<b>1632.E6</b>			<input type="checkbox"/>	C	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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Item	Question	Representation Text
1	Representation Text 3.0 Sustainability Context and Objectives Table 3.1 The SA Framework CCW welcome the clear way that changes made to the SA Framework in response to the consultation process have been presented. However, we are somewhat disappointed that while some of our comments (such as inclusion of Public Access to Natural Green Space) have been included, others have not. That aside, the majority of the objectives are reasonable and appropriate and the decision aiding questions useful and informative.	
2	Changes Sought None.	

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1632.E7			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
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Item	Question	Representation Text
1	Representation Text	<p>3.0 Sustainability Context and Objectives</p> <p>Table 3.2 Sustainability Appraisal Key</p> <p>CCW welcomes the scoring key used as a clear and effective way of identifying the potential sustainability impacts of the various elements of the plan. However, as raised in previous comments and noted again below, some of the scores assigned to policies and options are not always clear and the justification for whether monitoring or mitigation is required for a options with a less sustainable score sometimes confusing or even in some cases contradictory. It is inevitable in such a complex process that errors are sometimes made or, in the absence of sufficient baseline data, judgements questioned. However, it is important that where possible as the plan progresses towards adoption, errors are corrected and if high levels of doubt or uncertainty still exist, then they are noted as such and appropriate measures incorporated in the monitoring Strategy.</p>
2	Changes Sought	<p>The scoring key. it is important that errors are corrected and, if high levels of doubt or uncertainty still exist, then they are noted as such and appropriate measures incorporated in the monitoring Strategy.</p>

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Item	Question	Representation Text
1	Representation Text	<p>4.0 - SA of the Preferred Strategy</p> <p>4.5 – SA of Strategic Policies. The summaries of the assessments of the 12 Strategic Policies reflect reasonably well the assessment process, however, there are number of points of concern with the outcomes. Several of the strategic policies assessments highlight potential negative impacts, with an emphasis on the environmental factors as identified in section 4.18. It must be remembered that the SA process gives equal weight to all the assessment categories (eg economic), while the SEA process concentrates on the environmental aspects. Great care is, therefore, required to ensure that negative assessments against the environmental criteria are not masked in the overall assessment by more positive assessments against broader SA criteria. The presentation of this element within the SA report does not make it easy or straightforward to see if this was the case or how appropriate changes to, or mitigation for, these potential negative impacts were taken forward within the LDP process. This is an important point, as a failure to demonstrate how the negative environmental impacts of the plan have been adequately addressed may be interpreted as a failure to comply with the SEA Regulations. However, we do acknowledge that further assessment was carried out on the detailed policies in the Deposit Plan (see comments below on Section 5), and we welcome the inclusion of the table in Appendix VII which shows how the plan has sought to address some of the recommendations within the SA report.</p>
2	Changes Sought	<p>4.5 – SA of Strategic Policies. Great care is required to ensure that negative assessments against the environmental criteria are not masked in the overall assessment by more positive assessments against broader SA criteria. The presentation of this element within the SA report does not make it easy or straightforward to see if this was the case or how appropriate changes to, or mitigation for, these potential negative impacts were taken forward within the LDP process.</p>

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<b>1632.E9</b>			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:	
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*Item Question*

**Representation Text**

1 Representation Text  
 4.0 - SA of the Preferred Strategy  
 4.27 - Compatibility Analysis of Site Specific Allocations Selection Method.  
 The issues raised above also apply to a certain extent to this section. The process once again seems overly complex; the SA objectives developed in the early stages being applied to an alternative set of objectives, making it difficult to see how the SEA assessment process has been applied to the final results (ie the allocations). This does not mean that the evaluation itself is incorrect or inappropriate, but simply that it is not easy to see how the candidate site allocation method has effectively implemented the SEA assessment process and therefore taken on board all the potential modifications that would have otherwise been recommended.

<b>1632.E10</b>			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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*Item Question*

**Representation Text**

1 Representation Text  
 4.0 - SA of the Preferred Strategy  
 4.33 Habitats Regulations Assessment (HRA) Screening –  
 Comments on the HRA are made separately but CCW welcome the incorporation of the findings of the assessment within the SA report.

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<b>1632.E11</b>			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft						Site:								PEX Session:		
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Item	Question	Representation Text
1	Representation Text 5.0 SA of Deposit Plan CCW welcomes the further assessment carried out as part of the iterative plan production process. The detailed policy appraisal tables in Appendix VI are particularly helpful in determining how the SA objectives have been applied to the detailed policies and we note that, in the main, the majority of polices perform well against the Sustainability Objectives. Unfortunately, the comments and recommendations identified in relation to specific objectives in Appendix VI are not always reflected in the LDP Progression table 5.5 (and Appendix VII) which often tends to address the "generic" response to the policy and not the specific issues identified. Where a key environmental issue has been identified in Appendix VI we would be looking for this to be either clearly addressed in the LDP Progression Table (and therefore reflected in the deposit LDP) or picked up as a monitoring requirement in the monitoring strategy. We do note that some of these issues may have been addressed in the actual plan itself and that changes and re-numbering of policies has further complicated the process but, in the interests of clarity, some effort should be made to address this in the SA report.	
2	Changes Sought Where a key environmental issue has been identified in Appendix VI we would be looking for this to be either clearly addressed in the LDP Progression Table (and therefore reflected in the deposit LDP) or picked up as a monitoring requirement in the monitoring strategy.	

<b>1632.E12</b>			<input type="checkbox"/>	C	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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Item	Question	Representation Text
1	Representation Text 5.7 & 5.8 CS3 Strategic Sites & CS4 Housing Requirements – the comments made above in relation to section 4.27 [Representation no. E9] are still applicable although the assessment of the specific allocations against the SA objectives does help to clarify and give confidence to the assessment results.	

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1632.E13			<input type="checkbox"/>	C	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft				Site:										PEX Session:		
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*Item Question*

**Representation Text**

- 1 Representation Text  
 5.12 CS8 Transportation –  
 The cumulative, in-combination and synergistic effects of the transportation policies (particularly major roads schemes) have not been particularly well covered in the SA report, though we note the positive effects identified for the strong public transport and commuting minimisation policies we also note the negative effects identified in table 5.4. In addition, the acknowledgement of the issues raised in the assessment and the recommendations subsequently made within the SA report have not been incorporated particularly well in the LDP.

1632.E14			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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*Item Question*

**Representation Text**

- 1 Representation Text  
 5.29 & 5.30 AW14 Safeguarding minerals & AW 15 Community Amenity Buffer Zones –  
 While we appreciate that these polices have undergone significant amendment as a result of the consultation process it is not clear within the report how they have been assessed or how the assessment of the previous policies (NSA32 and SSA 30, 31 & 32) now applies to these.
- 2 Changes Sought  
 We would seek further clarification of how the SEA process has been applied to these policies.



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1632.E15			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:		
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Item	Question	Representation Text
1	Representation Text	<p>Table 5.2 Summary of Southern Strategy Area Policy SSA 4 Development in the key settlement of Tonyrefail and SSA 10 Housing allocations –</p> <p>We note that the overall assessment for these policies (and associated allocations) is relatively positive. However, this assessment seems to be primarily based on the assumption that all the development will be within the settlement boundary. We note that significant areas of a protected site (Rhos Tonyrefail SSSI) and other priority biodiversity habitat lie within the settlement boundary and are, therefore, surprised that further consideration of this was not considered within the SA for this policy. We would expect at least some evaluation of the impact of significant new development on these biodiversity resources and potential recommendation of mitigation and monitoring to ensure any adverse environmental impact from this policy is minimised. We do note that in the evaluation for policy SSA 10, it is identified that one of the allocations does contain part of the above mentioned SSSI and recommendations are made but we also note that the LDP only proposes that survey and mitigation should be carried out prior to development taking place and not agreed prior to allocations being finalised as recommended. CCW fully appreciates that the designation of a Site of Special Scientific Interest does not preclude development but both policy and legislation strongly indicate that the presumption should be against development wherever possible. Given that the LDP sets the framework for development we feel this is a weakness in the SA report but, more importantly, represents significant failing in the translation of the SA/SEA process into the deposit plan.</p>
2	Changes Sought	<p>We would expect at least some evaluation of the impact of significant new development on these biodiversity resources and potential recommendation of mitigation and monitoring to ensure any adverse environmental impact from this policy is minimised.</p>

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Item	Question	Representation Text
1	Representation Text	<p>Table 5.4 Significant Negative Effects Emerging from the LDP –</p> <p>While we appreciate that it is not the purpose of the SEA process to remove all negative environmental aspects from a plan as complex and all encompassing as an LDP, it is required that such effects are identified, where possible quantified and mitigation or monitoring proposed to ensure they are avoided or minimised. We welcome, therefore, the inclusion of table 5.4 .....</p>
2	Changes Sought	<p>..... but feel some sort of response is required either within the SA report (perhaps as part of the monitoring strategy) or within the plan itself.</p>

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<b>1632.E17</b>			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft						Site:								PEX Session:	
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*Item Question*

**Representation Text**

- 1 Representation Text  
5.5 Summary of key recommendations and LDP progression.  
Subject to the comments above CCW welcomes the changes made in the LDP as a result of the SA/SEA process.

<b>1632.E18</b>			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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Policy:				Map:						Issue: Sustainability Appraisal					
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*Item Question*

**Representation Text**

- 1 Representation Text  
5.36 & 5.37 HRA Appropriate Assessment – Comments will be made separately on the HRA assessment of the LDP but CCW welcomes the inclusion of the findings of the HRA process within the SA report.

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<b>1632.E19</b>			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:		
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Item	Question	Representation Text
1	Representation Text	<p>6.0 Implementation and Monitoring                      CCW welcomes the inclusion of this detailed monitoring strategy and the clear way it sets out the role of monitoring within the SEA/LDP process. We particularly welcome the inclusion of sustainability indicators linked to the Spatial Plan and the Welsh Assembly Government's sustainable Development Scheme, .....</p>
2	Changes Sought	<p>..... though we would also recommend including indicators from the Wales Environment Strategy where appropriate and identifying specific indicators for the potential negative impacts identified in table 5.4.</p> <p>Table 6.1 Sustainability monitoring proposed targets and indicators</p> <p>2 culture and heritage - consider adding an indicator for the number of developments effecting Historic Landscapes requiring an ASIDOHL</p> <p>3 communities – consider an indicator relating to the Accessible Natural Green Space Assessment for RCT (eg % of communities meeting the minimum requirements), this indicator would also crossreference to 4 – health.</p> <p>9 Landscape – consider using the LANDMAP criteria (eg number of developments having positive or negative impacts on LANDMAP aspect layer(s))</p> <p>10 Biodiversity – CCW support the link to BAP habitats and species but you may also wish to consider improvements to ecological connectivity and/or Ecosystems good and services.</p> <p>12 Climate Change – the plan should include some measure for adaptation to climate change (possibly link to water energy and soils)</p> <p>Specific additional monitoring indicators and targets associated with the recommendations of the HRA should also be incorporated, notably air quality monitoring around the Cardiff Beech Woods SAC and Blaencynon SAC, water level monitoring around the Blaencynon SAC and monitoring of suitable marshy grassland habitats around the Blaencynon SAC, particularly associated with particular habitat creation/management mitigation measures.</p> <p>Additional monitoring indicators may be identified from the plan itself.</p>

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<b>1930.E1</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:				Site:								PEX Session:			
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Item	Question	Representation Text
1	Representation Text	<p>5. SA Recommendations and progression. Page 759 appendix V11</p> <p>This document contains the proposed changes and the Council's comments on those changes The Deposit Draft Local Development Plan 2006 - 2021 has been checked to see if these changes have taken place</p> <p>Policy NSA 5</p> <p>The SEA comments show how unsuitable this is as a Strategic Site, but the Council are determined to take this site forward. The only comment the Council made was the need for mitigation measures for the Environmental Issues (which include driving the access road across ancient Meadowland, bearing a SINC designation).</p> <p>The serious problems of access to this site for both Public Transport and Cars, Contamination, Flooding Issues, Sewerage Issues, and the Intrusion into the Wonderful Landscape of Histroical, Geological and Cultural note - has been glossed over.</p> <p>It is this plethora of problems that made the site fail so many of the Sustainability Criteria.</p>
2	Changes Sought	<p>If the Council can over-ride the results of the lengthy Sustainability Appraisal and the advice of the Experts in their respective fields, it brings into question the whole LDP process.</p>

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
<b>1930.E2</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:				Site:								PEX Session:			
Policy:				Map:				Issue:							
Summary:															

Item	Question	Representation Text
1	Representation Text	<p>SA Recommendation and Progression</p> <p>Page 761 Para item 1</p> <p>Appendix V11 Policy NSA 12 This document contains the proposed changes and the Council's comments on these changes The Deposit Draft Local Development Plan 2006 - 2021 has been checked to see if these changes have taken place.</p> <p>Policy NSA - 12 Boundary Changes</p> <p>Sustainability Appraisal: Progression Table NSA 12 Settlement Boundaries The Council disagreed with the suggested changes , the explanation of the reason given makes specific reference to "defined problems in Housing supply". The Statistical data used for the housing apportionment allocated a total of 45 houses to the Treherbert Ward. Many more than this have recently been approved by planning. Therefore there is no problem in housing supply in the Treherbert area.</p> <p>The boundary changes have allowed 600 houses to be allocated in the Treherbert Ward. Surely this is a contradiction to the statement above. Also the word need has not been qualified. This is more than excessive; there is no justification or need for this number of houses in this ward.</p>

2	Changes Sought	<p>The SEA exercise was time consuming and expensive and if it's guidelines are not followed why was it necessary in the first place</p>
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<b>1930.E3</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:						Site:								PEX Session:	
Policy:				Map:				Issue:							
Summary:															

Item	Question	Representation Text
1	Representation Text	
	6. Habitats Regulations Assessment	
	Para' no' item 6	
	Item 6 - Habitat Regulation Assessment	
	The Strategic Environmental Assessment is a lengthy document at 784 pages and any attempt to simplify or condense its contents should be made.	
	This section, whilst important for the Environmental Sustainability Issues is much better suited to stand alone for use as a reference document.	
2	Changes Sought	
	This document must be a REFERENCE document and as such should be presented in its own right.	

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<b>1930.E4</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:				Site:								PEX Session:			
Policy:				Map:				Issue:							
Summary:															

Item	Question	Representation Text
1	Representation Text	<p>1. SA of Core Strategy</p> <p>No1 SA of Core Strategy</p> <p>The document as a whole is much too technical for the average member of the Public to comprehend.</p> <p>The contents information at the start of the report states "Appendices (available separately)" I tried unsuccessfully to access them through the available Electronic means, this necessitated me trawling through the 784 page document for the page I required!</p> <p>This consultation is based upon information provided in appendix V1 and V11. Section 5.0 SA of Deposit Plan 2009 bullet point 7. I was probably one of the few people who took the time to read the full report. The SA of Core Strategy SA of Area Wide Policies SA of Strategic Areas</p> <p>Whilst the comments in the suggested mitigation and enhancement measures are appropriate and interesting to note, there is no indication given that they have been addressed. This comes much later in the LDP Progression Table. Nonetheless at this point we are being asked to comment upon a set of Strategies which could have changed before the final version of the Deposit Draft Local Development Plan was issued.</p>

2	Changes Sought	<p>THE DOCUMENTS SHOULD BE MADE MORE UNDERSTANDABLE</p>
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<b>3236.E1</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:						Site:								PEX Session:	
Policy:					Map:				Issue:						
Summary:															

Item	Question	Representation Text
1	Representation Text	<p>This representation relates to the SA of Area Wide Policies Page No. 32 Para No. 5.28</p> <p>The SA goes on to recommend that "...site restoration needs to be appropriately considered to improve the performance of the policy." (para 5.28) and that if this recommendation is adopted the assessment would be classified 'no sustainability constraints, development acceptable'.</p> <p>Nuon would welcome the adoption of the recommendation however, any stipulation of site restoration proposals made in the Deposit Plan must ensure flexibility is maintained to secure the best outcome for the SSA F identified in TAN 8.</p>
2	Changes Sought	None

<b>3236.E2</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document:						Site:								PEX Session:	
Policy:					Map:				Issue:						
Summary:															

Item	Question	Representation Text
1	Representation Text	<p>Representation to SA of Area Wide Policies Page No. 434 Para No. 9</p> <p>The suggested mitigation and enhancement measures should acknowledge that, in accordance with TAN 8, within (and immediately adjacent to) SSA's, the implicit objective is to accept landscape change i.e. a significant change in landscape character from wind turbine development (TAN 8 Appendix D, Paragraph 8.4).</p>
2	Changes Sought	Insert after "site restoration proposals", "having regard to the policy in TAN 8 that within, and immediately adjacent to, SSA's, significant landscape change should be accepted".



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<b>3236.E3</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:						Site:								PEX Session:	
Policy:					Map:				Issue:						
Summary:															

Item	Question	Representation Text
1	Representation Text	Representation Text
		Representation to SA of Area Wide Policies Page No. 432 Para No. 1
		The nature of the sustainability effect of policy on the SA Objective of Housing is unlikely to be 'No impact on the provision of housing'. However AW 13 itself states that any proposal for wind farm development should be located at least 500m from the nearest residential property recognising the difficulties that can arise from conflicting land uses. In making this representation it should be noted that Nuon does not accept the absolute nature of this part of Policy AW 13.
2	Changes Sought	Changes Sought
		Re-evaluate the impact of AW 13 on housing particularly the strategic sites identified in Draft Deposit Local Development Plan NSA 5 housing and housing built in accordance with AW 9

<b>3236.E4</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document:						Site:								PEX Session:	
Policy:					Map:				Issue:						
Summary:															

Item	Question	Representation Text
1	Representation Text	Representation Text
		Representation to SA of Area Wide Policies Page No. 437
		The SA states that "The issue of necessary transmission cables and pylons to serve developments of this scale are even more significant in terms of impacts on landscape and biodiversity..."
		It is not apparent what the SA's basis for claiming that the issues of cables and pylons serving the wind farm development are even more significant in terms of impact on landscape and biodiversity than the turbines.
		The SA goes on to recommend that the policy be improved SA by stipulating after use site restoration proposals. If this recommendation is adopted the assessment would be classified 'no sustainability constraints, development acceptable'.
		Nuon would welcome the adoption of the recommendation and the change in the sustainability assessment result to 'no sustainability constraints, development acceptable'. However, any stipulation of site restoration proposals made in the Deposit Plan must ensure flexibility is maintained to secure the best outcome for the SSA F identified in TAN 8.
2	Changes Sought	Changes Sought
		Delete the words "...are even more significant in terms of impacts on landscape...." and replace with "...can impact on landscape and biodiversity..."

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<b>3478.E1</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:				Site:								PEX Session:			
Policy:				Map:								Issue: Habitat Regulations Assessment			
Summary:															

Item	Question	Representation Text
1	Representation Text	
6.	Habitat Regulations Assessment	
	The HRA has not considered impacts to Special Area of Conservation (SAC) sites on the outskirts of the county boundary: Cwm Cadlan and Coedydd Nedd Mellte, located approximately 1km away. There was an assessment of the Blaen Cynon SAC and Cardiff Beech Woods within RCT. The assessment found there is a likely significant effect on the Blaen Cynon site, therefore the impacts to Cwm Cadlan and Coedydd Nedd Mellte should be assessed. This is because we would also expect these sites to be impacted by any additional development in the area, as any development, including the proposals in the Hirwaun and Penywaun areas in the Plan, would have stand alone and potential in combination effects upon these SACs.	
2	Changes Sought	
	The HRA should assess and consider potential impacts to the Cwm Cadlan and Coedydd Nedd Mellte SAC sites on the outskirts of the county boundary.	
	The HRA has identified impacts from air quality, any additional development and additional transport emissions within the proximity of the SAC sites that would cause additional impacts upon the SAC features. The Environment Agency has undertaken a review of all EAW consents under the Habitats Directive, and our 'Review of Consents Appropriate Assessments' information can be requested. This provides information on local impacts on the sites and any potential in combination effects.	

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<b>3478.E2</b>			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:				Site:								PEX Session:			
Policy:				Map:				Issue: Sustainability Appraisal							
Summary:															

Item	Question	Representation Text
1	Representation Text	
5.	SA Recommendations and Progression	
	The suggested water quality target and indicator we recommended in the Targets and Indicator consultation in December 2008, has been noted in the SA/SEA, but does not appear to have been included/taken forward.	
2	Changes Sought	
	We would recommend the inclusion of a target and indicator regarding improving water quality. This is because impacts to water quality arising from inadequate drainage systems has been noted as a key sustainability issue for RCT, and there is a requirement within the Water Framework Directive (WFD) for nearly all inland and coastal waters to achieve 'good status' by 2015.	
	The indicator we previously recommended is included below for your reference: '% of total classified river length complying with water quality objective (GQA: General Quality Assessment), or of 'good' status. And, '% of total classified river length complying with RQO / RE (River Quality Objective/ River Ecosystem) target'.	
	Note: We collate and issue this data. This is currently done under the General Quality Assessment (GQA), but will be superseded within the next 2-3 years by the Water Framework Directive (WFD).	