

Blaenau Gwent County Borough  
Council

Local Development Plan  
Deposit Plan and Focussed Changes  
Sustainability Appraisal Report

**Non Technical Summary**

January 2012

# Non-Technical Summary

## Overview of Process and Purpose of Sustainability Appraisal

The Blaenau Gwent Unitary Development Plan (UDP) was adopted on 6th July 2006. The Council is now preparing the Local Development Plan (LDP), which will replace the UDP upon adoption. The LDP will set out the Council's objectives and priorities for the development and use of land within the County Borough for the period 2006-2021. Atkins was commissioned in April 2007 by Blaenau Gwent County Borough Council (BGCBC) to undertake Sustainability Appraisal (SA) incorporating Strategic Environment Assessment (SEA) of the Blaenau Gwent LDP.

The purpose of this SA Report is to outline how the statutory requirements for SA (incorporating SEA) have informed the development of the Blaenau Gwent Deposit LDP. It records all of the SA work undertaken in predicting and evaluating the effects of strategic options and preferred policies, as well as the selection of preferred sites for the delivery of development.

## The Process Followed

Throughout the report, the term SA is used to describe the combined processes of SA/SEA, which involves four main stages. Stages A, B, C and D as described below, have been completed thus far.

### Stage A

- Identifying other plans, programmes and sustainability objectives that inform and influence the development of the LDP;
- Establishing an understanding of the social, environmental and economic conditions of Blaenau Gwent (referred to as 'the baseline');
- Identifying key sustainability issues in the County Borough;
- Outlining SA objectives against which to later evaluate the LDP policies, which will be grouped into components for assessment purposes; and
- Gathering consultation feedback on the proposed breadth of coverage and level of detail for the SA.

### Stage B

- Assessing a series of spatial strategic options;
- Assessing strategic sites for the development of employment, housing, retail, community facilities, minerals and waste;
- Completing an assessment to appraise the strategic policies against the SA objectives;
- Completing an assessment to appraise the development management and allocations and designations policies against the SA objectives;
- Identifying the cumulative, synergistic and indirect effects likely to arise as a result of the implementation of the LDP strategy and policies;
- Identifying appropriate mitigation to avoid predicted negative effects and making recommendations to further enhance predicted beneficial effects, where appropriate; and
- Identifying a suitable monitoring strategy.

### Stage C

- Preparation of Initial Sustainability Appraisal Report to accompany the Pre-Deposit LDP for consultation.

### Stage D

- Preparation of Sustainability Appraisal Report to accompany Deposit LDP for consultation.
- Preparation of the Sustainability Appraisal Report to accompany the Focussed Changes Report for consultation (following changes made as a result of consultation on the Deposit LDP).

## SA and Consultation

The aim of the consultation on the SA Report is to involve and engage with statutory consultees and other key stakeholders on the results of the appraisal. This is the SA Report to accompany the LDP Deposit Plan.

The period of consultation on the LDP Focussed Changes and Sustainability Appraisal Report is for 6 weeks, from 19 January 2012 to 1 March 2012.

The following reports have been consulted upon as part of this SA process:

- Sustainability Appraisal Scoping Report, November/December 2007;
- Initial Sustainability Appraisal Report (to accompany the LDP Pre-Deposit Consultation), November-December 2008; and
- Sustainability Appraisal Report (to accompany the LDP Deposit Consultation), May 2011.

For the consultation on the Pre-Deposit LDP and Initial Sustainability Appraisal Report as well as the Deposit LDP and Sustainability Appraisal Report, the following social, environmental and economic consultees were consulted: Countryside Council for Wales (CCW); Environment Agency (Wales); Cadw (Historic Environment Service of the Welsh Assembly Government); and other stakeholders with an interest in the development of Blaenau Gwent.

The statutory and non-statutory bodies and organisations that have responded to consultation to date are presented in Appendices A (Scoping Report and Initial SA Report) and L (Deposit SA Report).

### SA Working Group Meetings

In addition to the statutory consultation processes, the iterative process of the assessment of the LDP has also involved two workshops, in April 2008 and May 2010, bringing together the Sustainability Working Group that comprised representatives from across the Council as well as the statutory consultees.

## Habitats Regulations Assessment

A Habitats Regulations Assessment has been prepared independently from the SA in support of the LDP. The findings of the HRA were integrated into the LDP Deposit Plan policies, which were assessed in the April 2011 iteration. Therefore it is considered that the findings of the HRA are reflected within this report.

## Blaenau Gwent Local Development Plan (Deposit Plan April 2011)

The LDP vision is:

*'Through collaborative working, by 2021, Blaenau Gwent will become a network of sustainable, vibrant valley communities, where people have the skills, knowledge and opportunities to achieve a better quality of life and residents will live in safe, healthy and thriving communities, with access to a range of good quality affordable homes and thriving town centres. Its unique environment, cultural and historic identity will be protected and enhanced to create a place where people want to live, work and visit.'*

In order to achieve this vision, a series of objectives were identified. These are reproduced below:

### **“Theme 1: Create a Network of Sustainable Vibrant Valley Communities.**

1. *By 2021, Ebbw Vale will be the main service and retail hub for the County Borough supported by a network of vibrant district/local hubs that provide a range of local services and facilities for their local communities. The district hubs will be well linked to the main hub of Ebbw Vale through sustainable modes of transport. (See Strategic Policies 1, 2, 3 & 6)*
2. *By 2021, the population will have increased from 69,300 to 71,100 as a result of natural change and other people being attracted to the area. The overall population structure will be generally in line with that of Wales. (See Strategic Policies 4 & 5)*
3. *By 2021, 3,666 new houses will have been built, approximately 800 of which will be affordable. New housing sites, alongside improvements to existing houses, will have helped create sustainable communities. (See Strategic Policies 4 & 5)*
4. *By 2021, the use of sustainable modes of transport, particularly public transport, walking and cycling, will have increased and the quality and frequency of the public transport system improved. (See Strategic Policy 6)*
5. *All developments have been built in accordance with design guidance, are sustainable, safe by design, and appropriate to their context and have helped improve the quality of the physical and natural environment. (See Strategic Policy 7)*
6. *New development has minimised further climate change contributions and, where appropriate, mitigated or adapted to its predicted effects. This has been achieved by:*
  - *Maximising the use of land;*
  - *Promoting the re-use and restoration of derelict land and buildings;*
  - *By focusing development away from areas vulnerable to flooding;*
  - *By reducing energy consumption through improved design and locating development close to hubs and public transport routes; and*
  - *By increasing the supply of renewable energy. (See Strategic Policy 7)*

### **Theme 2: Create Opportunities for Sustainable Economic Growth and Promote Learning and Skills**

7. *By 2021, the regeneration plans for ‘The Works’, Ebbw Vale Northern Corridor and other key regeneration sites have been delivered benefitting the residents of the County Borough through the delivery of jobs, houses and community infrastructure. (See Strategic Policies 1, 2, 3, 8 and 9)*
8. *By 2021, employment and economic activity rates will have increased and unemployment decreased with levels nearer national averages. This has been achieved by diversifying the economic base into construction, business services, health and social care, tourism and leisure and environmental industries, whilst supporting the manufacturing sector. (See Strategic Policy 1 and 8)*
9. *By 2021, between 50 hectares of employment land and a range of premises have been delivered which meet the needs of local businesses and offers employment opportunities for local people. (See Strategic Policy 8)*
10. *By 2021, the delivery of the Learning Zone, new schools and integrated education services, including life-long learning have facilitated improvements and broadened opportunities for education levels and skills. (See Strategic Policy 8)*

### **Theme 3: Create Safe, Healthy, and Vibrant Communities and Protect and Enhance the Unique Natural and Built Environment.**

11. *By 2021, an accessible network of green open spaces and high quality leisure infrastructure has helped increase participation in sport and active recreation and, contributes to improvements in health and well-being. (See Strategic Policy 9)*
12. *The unique landscape and natural heritage, has helped foster sustainable tourism and promoted community pride. (See Strategic Policy 10)*
13. *By 2021, the biodiversity resource of Blaenau Gwent has been protected and enhanced and the connectivity of ecological networks has been improved from 2006 levels. (See Strategic Policy 10)*
14. *Blaenau Gwent's historical and cultural environment has been protected and enhanced and has contributed to the regeneration of the area. (See Strategic Policy 11)*

### **Theme 4: Create opportunities to secure an Adequate Supply of Minerals and Reduce Waste.**

15. *By 2021, the 3 million tonnes of mineral resources required to be provided in Blaenau Gwent by the Regional Plan has been worked and resources of local, regional and national importance safeguarded. (See Strategic Policy 12)*
16. *A sustainable, integrated approach to waste management has minimised the production of waste and its impact on the environment, and maximised the use of unavoidable waste as a resource. By 2021, national recycling and composting targets outlined in the Draft Wales Waste Strategy: 'Towards Zero Waste' have been met. (See Strategic Policy 13)."*

## **Sustainability Baseline and Key Issues/Opportunities**

The main sustainability issues identified for Blaenau Gwent, from an assessment of the relevant baseline, are listed below:

- High levels of economic inactivity and high benefit dependence;
- Limited employment opportunities and low household income;
- Potential for the expansion of the tourism industry;
- High Vacancy Rates in Town centres;
- High level of varying housing needs including: poor housing quality and mismatch of housing size/tenure with needs and demand; need for additional gypsy/traveller accommodation; housing affordability problems;
- Low educational attainment;
- Transport access constraints to the area;
- Poor health levels;
- Strong social networks;
- High overall crime rate;
- High car usage and CO<sub>2</sub> emissions;
- Under appreciation and protection of natural resources, landscape, geodiversity and biodiversity value;
- Under appreciation and protection of heritage resources;
- Limited supply of developable land;
- Contaminated sites due to industrial legacy; and
- Increasing household waste arisings.

## Sustainability Appraisal Framework

The Sustainability Appraisal Framework is a key tool in completing the SA as it allows the assessment of the effects arising from the LDP proposals in key areas to be undertaken in a systematic way. The LDP SA objectives were developed through the Stage A work. These were consulted on through the SA Scoping Report. The final objectives are shown below:

1. To promote economic growth and strengthen and diversify the economy
2. To increase levels of local employment and ensure distribution of opportunities
3. To enable the development of a strong tourism economy in Blaenau Gwent complementary to the regional offer
4. To enhance the viability and vitality of town centres
5. To meet identified housing need
6. To improve the quality of Blaenau Gwent's housing stock
7. To secure the delivery and maintenance of quality affordable housing
8. To improve educational attainment and increase skill levels
9. To improve accessibility to education, leisure, employment, health, homes and community services for all sectors of the community
10. To promote community health, social care and well being
11. To reduce crime, social disorder and fear of crime
12. To protect and enhance the welsh culture
13. To encourage modal shift from private transport to sustainable transport
14. To protect and enhance biodiversity across Blaenau Gwent
15. To conserve and enhance the heritage assets of Blaenau Gwent and their settings
16. To make the best of previously developed land and existing buildings to minimise pressure for greenfield development, whether this will not result in damage or loss to biodiversity
17. To conserve soil resources and their quality
18. To reduce emissions of greenhouse gases, in particular carbon dioxide
19. To reduce waste generation and maximise reuse and recycling
20. To maintain air quality
21. To maintain current low levels of vulnerability of all development to flooding
22. To promote the use of sustainably sourced products and resources
23. To increase energy efficiency and generation and use of renewable energy across the County Borough
24. To conserve and enhance surface and ground water quality
25. Protect the quality and character of the landscape and enhance where necessary

## Compatibility between LDP and SA Objectives

Initial work on the LDP identified a set of objectives to achieve the overall vision for the area. Each of these objectives was evaluated in terms of its compatibility with each of the 25 SA objectives listed above. The SA recommended a number of changes to the LDP objectives, which were considered and, where appropriate, integrated into the final LDP objectives. The

generation of the LDP objectives was also informed by workshops held with stakeholders and elected members.

## Strategic Issues and Options

In July 2007 BGCBC consulted on an Issues Paper, as *'the first step in preparing the Preferred Strategy for the Local Development Plan.'* It was intended as *'a discussion document intended to promote debate focused on the issues of strategic significance'*.

The first workshop task involved attendees discussing different topic areas, to agree and then prioritise issues. The 'Vision' workshop involved building consensus on where consultees wanted Blaenau Gwent to be by 2021. These findings were taken into account when BGCBC prepared draft Strategy Options for discussion at workshops in November 2007.

Building on the opinions and views expressed at the Issues and Vision workshop, the findings of the consultation exercise on the Issues Paper, the evidence base and National and Local Policy, a set of three options were identified by the BGCBC Planning Policy Team. These were entitled:

### **Option 1: Regeneration (continuation of the Unitary Development Plan Strategy)**

The first option maintains the current strategy contained in the Blaenau Gwent Adopted UDP. This was a regeneration strategy that attempted to retain a substantial valley community in Blaenau Gwent to support an adequate range of community services and facilities.

### **Option 2: Growth and Regeneration**

This option is based around attempting to address the issues identified at the earlier workshop and is informed by National Guidance, particularly the Wales Spatial Plan and the Blaenau Gwent Regeneration Strategy.

### **Option 3: Balanced and Interconnected Communities**

This strategy attempts to address the issues identified and is based on ideology set out in the regional guidance document entitled 'Turning Heads'.

The SA process is designed to identify the most sustainable option overall, explore the relative merits of the three strategy options in terms of promoting the different dimensions of sustainability (social, environment, and economic).

The appraisal of the strategic options found that Option 2 was predicted to be the most sustainable. The option is envisaged to potentially create a diverse economic base, improving employment opportunities as well as delivering access to a range of services and facilities.

In terms of environmental effects, however, the options performed similarly and were predicted to have unsustainable effects. Recommendations were made in the SA to improve the approach taken in Option 2.

As can be seen in the LDP Deposit Plan (April 2011), the strategy clearly demonstrates the integration of the principles recommended by the SA at the Strategic Options stage.

## Development of Strategic Sites

Strategic sites identified in the LDP Deposit Plan have been subject to various levels of assessment, which have been undertaken by the Council, in order to determine their performance across a range of issues, including social, environmental and economic factors. The methodology used by BGCBC to identify strategic sites incorporates those elements of the SA objectives that are relevant to individual sites. The rationale used for the sites assessment and the assessment results are included in the SA Report. Detailed information about the sites will be provided in the Site Descriptions Document accompanying the LDP.

The following stages of assessment were undertaken by the Council:

- Stage 1: Initial Planning Assessment
- Stage 2: Expert Assessments
- Stage 3: Consultation with Appropriate Bodies
- Stage 4: Assessment against the LDP Preferred Strategy
- Stage 5: Assessment of the Sites against SA Objectives

The results of the sites assessment undertaken by BGCBC have been integrated into the assessments of policies relating to the allocation and designation of specific sites for development or conservation, included in the discussion below.

## Assessment of Significant Effects of the Strategic Policies

The LDP Deposit Plan contains Strategic Policies; Development Management Policies; and policies relating to the allocation and designation of specific sites for development or conservation.

Following confirmation of the strategy direction, a draft set of Strategic Policies was developed in order to deliver the objectives of the LDP. These 17 Strategic Policies were assessed as part of the Initial Sustainability Appraisal (in ISAR November 2008). The purpose of the assessment was to derive the sustainability implications in terms of implementing the policies and to identify areas for improvement that will mitigate predicted negative significant effects. Overall, the Draft Preferred Strategy appeared to generate more benefits from an economic perspective, with the least benefits being generated for the environment. It was suggested that the strategy should be further refined to create a greater focus on environmental improvements alongside economic and social regeneration initiatives. Most notably, three of the sustainability objectives within the 'environment' dimension of sustainability conflicted with the strategic policies. These were: to reduce the emission of greenhouse gases, in particular carbon dioxide; to reduce waste generation and maximise reuse and recycling; and to maintain current air quality.

The Strategic Policies from 2008 were revised and subject to SA (April 2011) for this Final SA Report based on the changes made by BGCBC. These changes have been based on a number of factors including the SA recommendations; HRA recommendations; changes to the national policy context; and improvements to the evidence base. Changes made between 2008 and May 2010, were not subject to an additional iteration of assessment, as the changes made in this period were largely based on SA recommendations. This is set out in Appendix J. The 13 Deposit LDP Strategic Policies subject to the final SA iteration in April 2011 were:

- SP1 Northern Strategy Area – Sustainable Growth and Regeneration
- SP2 Southern Strategy Area – Regeneration
- SP3 The Retail Hierarchy and Vitality and Viability of the Town Centres
- SP4 Delivering Quality Housing
- SP5 Spatial Distribution of Housing Sites
- SP6 Ensuring Accessibility
- SP7 Climate Change
- SP8 Sustainable Economic Growth
- SP9 Active and Healthy Communities
- SP10 Protection and Enhancement of the Natural Environment
- SP11 Protection and Enhancement of the Built Environment
- SP12 Securing an Adequate Supply of Minerals
- SP13 Delivering Sustainable Waste Management



The assessment findings showed an improvement in the balance of predicted effects of most of the Strategic Policies against the SA objectives, compared to earlier iterations of the LDP. This has included an improvement in the predicted effects of the policies on the environment.

Overall, the Strategic Policies performed well against the SA objectives, particularly SA objectives covering economic, social and environmental sustainability issues ranging from economic growth and employment, housing, skills, accessibility, health, transport, biodiversity, heritage, land and soil quality, sustainable resources and renewable energy. A mix of both positive and negative effects has been predicted against objectives relating to greenhouse gas emissions; waste; air quality; flood risk; water quality; and landscape quality. Where a mix of positive and negative effects is predicted, mitigation may be possible. This is explained in the text below.

## Assessment of Significant Effects of Development Management, Allocations and Designations Policies

Along with the Strategic Policies referred to in the previous section, the LDP Deposit Plan comprises a total of 21 Development Management Policies and 31 Allocations and Designations Policies. In May 2010, the policies were subject to assessment by the SA team, leading to a series of SA recommendations that were used to inform the BGCBC SA working group meeting (21.05.2010). The LDP policies were then revised to reflect the combined recommendations, with the resulting policies now forming the LDP Deposit Plan. The policies have since been further revised, to reflect the changing national policy context and the HRA AA results. These are assessed in this Final SAR (April 2011).

In order to undertake the assessment, the Development Management Policies and Allocations and Designations Policies were grouped under similar themes and matched with their associated Strategic Policy. Each grouping or 'theme' was then assessed separately – this approach was devised to facilitate the effectiveness of appraisal and reduce the potential for repetition or contradiction.

The Development Management and Allocations and Designations policies assessed for this report, grouped by theme, are:

### Theme 1 – Retail and Town Centre Vitality and Viability

- DM6 Use Class Restrictions in Principal and District Town Centres
- DM7 Use Class Restriction in Blaina Local Town Centre
- AA1 Action Area
- R1 Retail Allocations

### Theme 2 – Housing

- DM8 Affordable Housing
- DM9 Rural Exception Sites
- DM10 Sites for Gypsies and Travellers
- H1 Housing Allocations
- HC1 Housing Commitments
- GT1 Gypsy and Traveller Accommodation

### Theme 3 - Accessibility

- T1 Cycle Routes
- T2 Rail Network and Station Improvements
- T3 Safeguarding of Disused Railway Infrastructure
- T4 Improvements to Bus Services

- T5 New Roads to Facilitate Development
- T6 Regeneration Led Highway Improvements

#### **Theme 4 – Sustainable Design**

- DM1 New Development
- DM2 Design and Placemaking
- DM5 Low and Zero Carbon Energy

#### **Theme 5 – Economy and Employment**

- DM11 Use Class Restrictions – Employment
- EMP1 Employment Allocations
- EMP2 Employment Area Protection
- ED 1 Education Provision
- TM1 Tourism and Leisure

#### **Theme 6 – Communities**

- DM4 Infrastructure Provision
- DM12 Protection of Community and Leisure Facilities
- DM13 Provision for Open Space, Recreation and Leisure Facilities
- DM14 Protection of Open Space
- CF1 Community Centre
- L1 Formal Leisure Facilities

#### **Theme 7 – Natural Environment**

- DM3 Air and Water Pollution
- DM15 Biodiversity Protection and Enhancement
- DM16 Protection and Enhancement of the Green Infrastructure
- DM17 Trees, Woodlands and Hedgerow Protection
- ENV1 Green Wedges
- ENV2 - Special Landscape Areas
- ENV3 Sites of Importance for Nature Conservation
- ENV4 Land Reclamation Schemes
- ENV5 Cemeteries

#### **Theme 8 – Built Environment**

- DM18 Buildings and Structures of Local Importance
- SB1 Settlement Boundaries

#### **Theme 9 – Minerals**

- DM19 Criteria for the Assessment of Mineral Applications
- DM20 Mineral Safeguarding
- M1 Safeguarding of Minerals
- M2 Mineral Buffer Zones
- M3 Areas where Coal Working will not be Acceptable
- M4 Preferred Areas

#### **Theme 10 – Waste**

- DM21 Waste
- W1 Land for Waste Management

The final iteration of assessments led to the prediction of a mix of both positive and negative significant effects, although the overall balance of effects was predicted to be positive. Positive effects for improving the potential for sustainable development in Blaenau Gwent are predicted for the following contributing factors:

- Economic growth, diversification and employment;
- Housing needs and housing quality;
- Educational attainment and skills;
- Equitable accessibility to community services;
- Health and wellbeing;
- Conservation of heritage assets;
- Use of sustainably sourced resources;
- Energy efficiency; and
- Conservation of water quality.

A mix of both positive and negative effects were predicted for factors including sustainable transport; biodiversity; use of previously developed land and greenfield land; soil quality; greenhouse gas emissions; waste generation; air quality; flood risk; and landscape quality. However, it is likely that these effects can be mitigated, as explained in the text below.

The assessment findings showed an improvement in the potential for the Development Management and Allocations and Designations Policies to contribute to sustainable development, compared to earlier iterations of the LDP.

## Focussed Changes, November 2011

In May 2011, the Deposit LDP, alongside the SA Report (April 2011) was consulted on for six weeks. A further six week LDP consultation was undertaken in July 2011 in response to sites submitted during the first consultation. The Focussed Changes document details how the consultation comments have been taken into account in the LDP.

The Focussed Changes (including minor changes) were reviewed against the SA of the latest iteration of the LDP policies. This was ordered by theme, in the same way that the policy appraisal was undertaken. The review included an evaluation of whether or not the focussed change was likely to lead to a change in the predicted effects of the LDP through SA, and whether the change would contribute to improved sustainable development more generally. Minor changes made to the LDP were also considered as part of the review process. However, some of the changes were not considered sufficiently important to warrant consideration in this report.

The results of the review of the Focussed Changes of the LDP are presented in Table 9.1. Overall, it has been concluded that no further SA is required as a result of the changes made to the LDP. All of the changes considered are likely to improve the potential of the LDP to contribute to more sustainable development.

## Cumulative, Synergistic and Indirect Effects

As required by the SEA Directive, cumulative, synergistic and indirect effects have also been recorded and analysed during the appraisal iterations. These can be summarised as follows:

### Positive

- Cumulative effect on economic prosperity;
- Cumulative effect on efficient use of land;
- Synergistic and cumulative effect on accessibility to community facilities and improvement in community health and well being including reducing crime and the fear of crime;

- Cumulative effect to enact a shift to more sustainable modes of transport and to improve local air quality and health;
- Cumulative effect on meeting housing needs;
- Cumulative effects for protecting heritage assets; and
- Cumulative effects on the increase in energy efficiency and generation and use of renewable energy.

#### Adverse

- Local air quality and greenhouse gas emissions;
- Cumulative effect on landscape quality; and
- Cumulative effect of increasing development has the potential to increase flood risk.

## Mitigation

Mitigation measures for each policy were identified throughout the SA process and are highlighted in the policy specific recommendations. It is considered that the recommended mitigation for the LDP has been incorporated where necessary as a result of the SA. Additional measures as a result of the HRA AA have also been integrated into the LDP. It is considered that these inclusions, alongside national planning policy and other documents accompanying the LDP such as the SFCA Stage 2; Site Descriptions Document; and site specific mitigation strategies for biodiversity, should lead to the avoidance of significant negative effects.

## Monitoring

SA monitoring will cover predicted significant social and economic effects, as well as predicted significant environmental effects. The monitoring process involves measuring indicators that will enable the establishment of a causal link between the implementation of the plan and the likely significant effects (both positive and negative) being monitored. In line with the SEA Directive, these significant positive and negative effects should be monitored with the implementation of the LDP.

In order to reach a final framework of indicators for the Annual Monitoring Report (AMR) for the LDP, BGCBC will need to consider the additional indicators proposed in the SA to identify those that can be most effectively used to monitor the sustainability effects of the LDP as a whole.

## Conclusions

It is considered that the policies in the LDP Deposit Plan including the Focussed Changes for Blaenau Gwent, taken together and alongside national planning policies, will help to lead to sustainable development over the plan period. On balance, the LDP Deposit Plan, including the Focussed Changes has the potential to lead to the creation of sustainable communities, with the proportion of significant positive sustainability effects being considered to outweigh the predicted negative effects.

The LDP overall is likely to have significant benefits for sustainable development, particularly relating to the following contributors:

- Economic growth and diversification of the local economy;
- Increased levels of local employment and equitable distribution of opportunities;
- Improved tourism economy complementary to the regional offer;
- Enhanced vitality and viability of town centres;
- Improved ability to meet housing needs including the needs of the Gypsy, Traveller and Travelling Showpeople communities;

- Increased levels of skills and education;
- Improved accessibility to essential services and facilities;
- Improved levels of health and wellbeing including a reduction in crime and the fear of crime and an enhanced sense of local distinctiveness;
- Increased potential for a modal shift to more sustainable modes of transport;
- Increased potential for enabling enhanced biodiversity;
- Conservation of heritage assets;
- Making the best use of natural resources including prioritising the use of previously developed sites and promoting the use of sustainably sourced materials;
- Increased energy efficiency in new development and encouraging the generation of energy from low and zero carbon sources; and
- Improved protection of landscape quality where possible.

It is considered that the mitigation of the predicted negative effects of the LDP, such as effects on local air quality, biodiversity, greenhouse gas emissions, water quality, soil quality and flood risk, can be achieved through the effective implementation of measures included within supporting documents to the LDP. Supporting documents that contain further policy guidance and mitigation include the Site Descriptions Document; national planning policies; site specific biodiversity mitigation strategies; and the Strategic Flood Consequences Assessment Stage 2. It is considered that recommendations from the April 2011 iteration of assessments, which have not been integrated into the Deposit LDP, are concerned with the improvement of positive effects rather than with the mitigation of negative effects. Therefore their implementation is not critical to the sustainability performance of the LDP as a whole.

The HRA AA Report concludes that *“...before the consideration of mitigation measures, there was a risk that delivery of 8 out of the 13 Deposit LDP strategic policies could potentially have adverse effects on the integrity of the sites concerned. However, after the introduction of mitigation measures these risks were removed... The Appropriate Assessment has identified that, before the consideration of mitigation measures, four European sites could potentially be affected by the delivery of the LDP when considered on its own. However, after the introduction of mitigation measures the AA did not identify any of the European sites which could potentially be affected by the delivery of the LDP.”* It is considered that the LDP integrates the recommendations of the HRA report. These changes are reflected in the April 2011 Deposit Plan policies assessed in this SAR. No further HRA was undertaken in November 2011 on the Focussed Changes to the Deposit Plan as the nature of the changes weren't considered to be relevant to the European Designations.

The process of Sustainability Appraisal throughout the LDP's preparation has been thorough and comprehensive. Various methods of consultation have been utilised, both formal and informal, which have informed the development of both the LDP and the SA. Several iterations of assessment have been employed, with continuous dialogue between the BGCBC planning team and the SA team.

The evolving, iterative nature of the SA process employed for the development of the LDP has enabled the integration of the core principles of sustainable development into the LDP Deposit Plan. The value of this process, particularly in the refining of the Strategic Policies and the Development Management and Allocations and Designations Policies, is explained more thoroughly in sections 7, 8 and 9. These sections clearly demonstrate the improvements in performance of the LDP against the SA objectives between iterations. Improvements in performance have been attributable to factors such as: increased detail set out in policies and supporting text; improvements in the overall approach and LDP strategy; a shift of focus to encourage more sustainable forms of economic growth; and an increase in the supporting documentation to the LDP including mitigation strategies for particular predicted effects.