

Local Development Plan and Community Plan Sustainability Appraisal and Strategic Environmental Assessment **Scoping Report**

Consultation Responses

The draft Scoping Report was open for statutory consultation and a wider consultation from 31 July 2008 to 5 September 2008. The statutory consultees are Environment Agency Wales, Countryside Council for Wales and Cadw. It is good practice to also consult organisations with a social and economic remit as well as those with an environmental remit.

A total of 7 responses were received. The responses received were mainly supportive and the majority of respondents commented that the document was clear and detailed. For a summary of consultation comments and officer responses to them see Table 1 below. Responses are presented in the format that they were received and have not been edited.

The consultation responses set out in Table 1 below have been structured in response to the questions set out in the questionnaire which asked the following;

1. The proposed methodology and any other matters that should be included
2. The baseline data and whether the correct issues have been identified
3. The data and sources are sufficient, and if further information is necessary, provide data or suggest sources
4. Are there any other policies, plans or programmes to be included?
5. Are there any additional key sustainability problems, objectives or issues relevant to land use planning for which sustainability objectives and indicators should be developed?
6. Other general comments

Table 1: Consultation responses to the SA Scoping Report

Consultee	Comment	Officer Response
██████████ CCW (Statutory Consultee)	We commend your authority on undertaking a SA/SEA on your forthcoming Community Plan. As the scoping report states, SA/SEA is non-statutory for such documents, so we welcome the commitment to sustainability demonstrated by this decision. We do however, have some concerns that by undertaking the two SA/SEA processes simultaneously, this has led to confusion. The collation of baseline data is referred to in relation to the LDP, but not the CP in section 2.9.4 and the text in section 2.9.7 which refers to childcare and skills being outside of the scope of the LDP is confusing, as childcare and skills are topics relevant to the unmentioned CP. In addition, the two plans are not for the same geographical area. This causes confusion surrounding the presentation of baseline data. We note that efforts have been made to clarify whether the information is for the jurisdiction of Pembrokeshire County Council (PCC) or for the whole of the county of Pembrokeshire, but this has not always been consistently applied such as for the information on housing stock. It is also an issue as even for the LDP, with the smaller geographical area, its sphere of influence in terms of environmental impact is larger than PCC's jurisdiction. For example, in terms of transport, information should be gathered for neighbouring parts of Carmarthenshire and Ceredigion. We also suggest that it is worthwhile including a statement from the Pembrokeshire Coast National Park Authority in this document about the undertaking of an SA/SEA for this joint CP, and how the SA/SEA they are currently working on for their LDP and Management Plan will feed into the process. This may be	Noted. No amendments necessary. The SA scoping exercise was carried out for both the CP and LDP to avoid duplication. The full SA Report will be undertaken separately for the CP and LDP. The report has been amended to make it clearer where baseline is available for the whole county, the National Park and the PCC area and therefore where reference is to the CP or LDP. The LDP and CP are strategic document which relate to Pembrokeshire, therefore information has been collected for this area. Dialogue with neighbouring authorities has and will continue to occur throughout this SA Scoping process. Noted. The PCNPA will be involved with production of the CP. A paragraph will be added to reflect this.

particularly relevant when deciding upon objectives for the CP on landscape and cultural heritage for example.

We have concerns that the timetable for the production of the preferred strategy this autumn is very tight, and may not allow for the rigorous assessment of the various options through the SEA process, given that the objectives that will be used in such a process will not be set down until early September, after this consultation closes. We feel that wherever possible, more time should be allowed for this part of the process to prevent further work at an earlier stage.

We also have concerns about the definitions used for some of the topics. There may be ways to improve the categorisation of the topics to make the document more reader-friendly. For example, social fabric is a large topic and would benefit from being more narrowly defined. Energy efficiency could be discussed solely within the topic on climatic factors, and noise could be looked at under human health. In addition, housing could be amalgamated with the population topic given the obvious links between the two subjects. However, the cake is split, we suggest that at the start of each topic, a definition is provided to ensure there is no unnecessary duplication.

Annex 1.

Questions answered are as they arise in the consultation response form

a) The proposed methodology and any other matters that should be included.

See comments in the letter regarding the efficacy of scoping out the SA/SEA for the LDP and the CP together as well as topic definition.

The Delivery Agreement, which has been agreed by WAG, allows for four months slippage. Footnote added to reflect this caveat (page 13). Stakeholder involvement is an ongoing part of the process.

The topics were selected to reflect the topics set out in the SEA Directive and those in the WSP SEA. A note will be added at the start of each topic defining each topic area. Energy efficiency for example, is inter-related between many topic areas, therefore to ensure there is no exclusion.

Noted. See comments above.

b) The baseline data and whether the correct issues have been identified.

In general, we are concerned at the lack of trend data published in this report, which has led to a lack of consideration of the likely future development of that trend without a plan. These are two requisites of the SEA process.

Population – We believe it would be useful to include data about the additional population during the summer months due to the tourism industry, and any particular issues that may arise as a result, such as transport congestion and increased energy and water resource use. It is important that trend data is included in this summary, particularly on likely migration to and from the area, and the demographic changes predicted, as this is likely to have implications for both the LDP and CP, for example in terms of housing projections and future healthcare provision.

Human health – Little trend data has been supplied for this topic and for the data that has been referenced, and it is unclear whether it relates to the PCC area only or to the whole county of Pembrokeshire. There has been no assessment of whether environmental pollution is a cause for concern within the area. We suggest this is considered.

Transport – Little trend data is available in this section. This should either be sourced or identified as a data gap. Section 6.2 does not

Trend information has been included where it is available in the baseline data (Appendix 2). During the next stages of the SA process, the evolution of the baseline without the plans will be defined, along with the 'no-plan' scenario.

A caveat on baseline data limitations has been added (paragraph 2.10.4).

Noted. Reference to the increased population in the summer months is noted in Appendix 2. Amended Scoping Report.

Further data on population projections have now been included in the SA Report.

There is limited specific trend data available for human health. Health data refers to the whole of the County. There is a lack of data about whether pollution affects health. Pollution has been discussed in the air quality topic.

Data was requested from SWWITCH, and the SA Report and appendix 2 were

appear to properly identify any issues with transport. We recommend that this is reconsidered.

Social fabric – Due to the wide-ranging subject as currently defined, the discussion of data and issues is also somewhat unfocussed. The statement in 7.2.3 is neither data nor an issue, and is not backed up by data suggesting that there is a lack of school places within the area. Paragraph 7.2.4 relates to access to services and therefore we suggest that this is better stated in the transport section.

Housing is currently included within the topic of 'social fabric', although we suggest above that it is amalgamated with the population topic to make social fabric more focussed as a topic. However, wherever housing sits within this document, we would expect to see summary data within this section on housing trends, and predicted forecasts of housing need, including the type of housing required and current allocations.

Indicators have been proposed for energy efficiency within houses. We suggest that this indicator needs to be linked to an identified issue and is also perhaps better discussed within the 'climatic factors' topic.

Economy – We question whether essential infrastructure such as ICT and sewerage should be discussed within this topic or whether

amended.

Data have been collected on what information is available. Issues have been identified from the baseline, from internal consultation and the PPP review. The LDP should have regard to school places where new development is proposed. This issue has been moved to the implications for the LDP and CP section.

Access to services is not only a transport issue, there are other issues associated with access to services. Access to services also impacts on human health and well-being.

The topics have adapted the WSP structure. Merging housing with population makes the topic area larger. Again, there are issues in population which are not just related to housing, there are also human health issues. Information from the LHMA, and a population and housing projections paper produced as part of the LDP evidence base were being awaited. This information has now been included in the SA Scoping Report.

Noted. Sewerage is now discussed in the Water topic as well as the economy

they would be better placed within the topic of material assets.

There is no trend data on existing and previous economics nor on economic developments such as the LNG plants on the Milford Haven, which in real terms appear only to provide short-term economic gain for the county. It would also be important to know levels of current and anticipated demand for employment sites, along with information on the specifics of units required.

Climatic Factors – We suggest that this section is revisited with a view to being more specific about whether the data relates to the area covered by the LDP, or the wider area concerned with the CP.

While we accept the statement about cleaner industry emitting less carbon dioxide (CO₂), we feel it is important to point out that these benefits may not be felt in Pembrokeshire.

Further consideration needs to be given to the links between climate change, shoreline management planning and climate change preparedness. For example, thought might be given to the potential need for changing certain key routes around the County (eg Haverfordwest to St David's), parts of which (e.g. Newgale) may be at risk from sea-level rise, and flooding events.

Material assets – We suggest that ecological footprint and electricity consumption are covered in the topic on climatic factors with other climate change issues. Similarly, pollution is discussed here, whereas we would recommend that pollution be covered within the specific topics of air, water and human health (for noise and light

topic. ICT remains in the economy section as ICT improvements are best targeted through the economy objectives rather than the material assets objectives.

Noted. Employment sites are included in Appendix 2, however there is no real issue with provision of employment sites. Information has been added into the summary regarding LNG and employment sites.

Noted. Text has been amended to make clear reference to whole of the County.

Note added to reflect that effects may be felt elsewhere (paragraph 9.2.1).

Noted. The SA Scoping Report has been amended to state links between climate change, shoreline management planning and climate change preparedness (paragraph 9.3.2).

Ecological footprint relates to use of resources therefore it is considered appropriate to include it under the material assets topic. Pollution has been included here to ensure that one

pollution). However, we suggest that this topic picks up infrastructure issues such as sewerage and ICT. We also believe that it is appropriate here for inclusion of an issue related to quarries and their after-use – they are a geological resource that can be used for study, for recreation, and for enhancing wildlife resource and ecological connectivity.

Water – The duplication of information on flooding here and within the climatic factors topics might cause confusion at a later date and so we suggest that information on flooding is only dealt with in one topic.

There is no baseline information on water resources, bathing water quality, pollution events presented within this summary section, despite being covered in the appendices. We recommend that this is revisited so as the document conveys a true summary of the relevant baseline data relevant to this topic. This topic also suffers from a lack of existing trends, nor predictions made for the future. This information is vital for the LDP in terms of servicing population change, and also important for the CP in terms of human health and growing the tourism industry. We believe that all this information will be available from the Environment Agency. We recommend that when this information is reviewed, the objective is revised to include water quantity, not just quality.

Soil- We seek clarity on which type of land is to be protected as stated in section 13.3.1. We also suggest given the statements in this section on soil as a carbon sink that some information is gathered on the presence of organic soils within the area. This information may need to be identified as a data gap as we are not

objective relating to all types of pollution, rather than an objective for each type of pollution. This will make the appraisal process less complicated. Infrastructure has been included in the economy and water section. The after-use of quarries is highlighted in paragraph 11.3.3. The sentence has been expanded.

Specific information on flooding has been included in the water topic.

Information from the appendices has been included in the SA Scoping summary. Information on pollution incidents was requested from the Environment Agency however, it was deemed as not being part of the SEA package. Trends have been identified where possible.

The objective for water quantity is included under Objective 13 which refers to 'resources'.

Noted. Text amended to add that there is an information gap on organic soils as a carbon store.

aware of any detailed mapping in this area.

Biodiversity- The term 'county' is used in this section and it is unclear whether it refers to the whole county of Pembrokeshire, as you might expect, or to PCC's jurisdiction. It is important to clarify this point when referring to numbers of sites or area of land designated.

The data in section 14.2.2 referring to SSSI quality should be caveated that this information is based on professional judgment alone in some cases, and not monitoring data. In addition, the review of site condition was completed several years ago and only related to habitat features, and not species. It would also be worthwhile referencing where the data on SAC/SPA condition was obtained from, as the most up to date information can now be obtained from our website.

We are surprised to see no reference to Biodiversity Action Plan (BAP) species and habitats in this section and feel that this is an important omission that needs to be rectified, even though some information is contained within the appendix. The NERC Act places a duty on all public authorities to have regard for biodiversity in their purposes and as such local BAP concerns may have implications for the plans.

Trend data is not presented here, nor predictions of the likely evolution of the state of biodiversity without the plan. Both are requirements of SEA and should be addressed before plan preparation progresses much further.

Cultural Heritage- We are pleased to see reference to LANDMAP in the baseline data, even though only visual and sensory data is included and we believe there may be more available. We suggest

Noted. Text amended to make clear that refers to the whole of the County.

Caveat included for SSSI quality.

Noted. The text has been amended to include assessments from the SAC/SPA management plans. However some of these assessments were carried out in 2005.

Noted. Text amended to refer to BAP species and habitats.

As noted previously, the evolution of the baseline without the plans will be defined, along with the 'no-plan' scenario during the next stage of the SA.

Noted. The Appendix has been amended to include the cultural landscape, landscape habitat, habitat

given that the CP boundary includes the Pembrokeshire Coast National Park, reference is made to the special qualities of the National Park. These should be available from the National Park Authority.

c) The data and sources are sufficient, and if further information is necessary, provide data or suggest sources.

Transport- We suggest that discussions are held with the South West Wales Integrated Transport Consortium (SWWITCH) who have collated a lot of information from local authorities in order to consult on their Regional Transport Plan. Proximity to services via different transport options should also be included, rather than a general description of services currently available. This information will help to identify the real issues.

Climatic Factors - We believe that there is a good deal more data that could have been brought together for this section. Information is missing on ecological footprint of Pembrokeshire (although included elsewhere), specific locations at risk of flooding (available from the Environment Agency), and existing greenhouse gas emission levels (available from DEFRA). We suggest that this is addressed before the plans develop much further.

d) Are there any other policies, plans or programmes to be included?

Transport- We would suggest that the Wales Transport Strategy review should be included within this summary section, particularly given its status within the hierarchy of WAG strategies and with one of its over-riding objectives being to reduce the need to travel.

Climatic Factors – We were surprised to see the commitment within One Wales to reduce the carbon equivalent emissions by 3% per

and species aspect layers.

Further reference to the National Park designation has also been made.

Noted. Information has been provided by SWWITCH, and the report has been updated.

Noted. Information on ecological footprint will be included in the climatic factors section. Information on greenhouse gas emissions is included in the Appendix 2, including data from DEFRA.
Specific information on flooding has been included in the Water section.

Text amended.

Noted. PPP review amended to include the One Wales commitment.

year by 2011 omitted from the PPP review. We suggest that this is included so that it and the ongoing work of the Climate Change Commission for Wales can be used to shape the LDP and CP. Given the strong steer from the Welsh Assembly Government (WAG) on this matter, we would look to strengthen the wording of section 9.3.1 to 'the LDP should reduce greenhouse gas emissions' and not as it currently is written.

Water – Within the PPP review for this topic, we would like specific mention to be made of the protected area objective within the Water Framework Directive, which includes achieving Favourable Conservation Status on all Natura 2000 sites by 2015. In addition, the aspiration within the Environment Strategy for Wales to increase water-based recreation should be referred to. WAG's recent consultation on the second Environment Strategy action plan included an action to develop an implementation plan by March 2009, along with the development of a challenge fund. We suggest that the review of the Cleddau and Pembrokeshire Coastal Rivers CAMS is included within this summary particularly with a view to future water resource capacity within the area.

Biodiversity- We are concerned that the target on sites of international and national importance contained within the Environment Strategy for Wales has not been listed here as a key consideration within this topic. The target is jointly owned by WAG and CCW, but will have many stakeholders, including local authorities. The target is to achieve favourable management on all sites by 2026, with two key milestones in 2010 and 2015.

In addition, the Review of Consents (RoC) process driven by the Habitats Directive to ensure no adverse impact on Natura 2000 sites should be mentioned here. Local authorities are competent

Noted. The LDP will seek to support the commitments to reduce greenhouse gases, where this is in the remit of the LDP. No amendments required.

The objective to achieve good ecological status as required by the Water Framework Directive has been added.

Noted. The baseline and report will be updated following publication of the second Environment Strategy.

Noted. Reference to the CAMS document is added.

The target has been included in Appendix 2 – amended SA Scoping Report to include target in PPP review.

Noted. SA scoping report amended to add the Review of Consents duties.

authorities under the Directive, as well as others, and as such should be putting in place ways of undertaking their RoC. Indeed, this process may have implications for the LDP and CP.

Cultural Heritage- We recommend that the Register of Landscapes of Historic Interest in Wales is included within this review.

e) Are there any additional key sustainability problems, objectives or issues relevant to land use planning for which sustainability objectives and indicators should be developed?

We seek clarification as to why some indicators are listed in bold text and others are not. We would also like to comment that indicators are only required to measure the significant effects predicted as the assessment progresses. Therefore, it is premature to be consulting on indicators at this stage and while we have attempted to offer some advice below, we expect full details of a monitoring programme to be developed and included in the Environment Report.

Population- Some of the suggested indicators listed relate to themes not identified as an issue for the area. An example of this is in the population section, where indicators on housing provision and energy efficiency are put forward, but there is no indicator on population size.

Human health – Given reference to access and recreation within the objective on this topic, we would suggest an indicator on accessibility of semi-natural greenspace.

Transport – Even though we have pointed out that no issues have been identified within the transport section, we support the objective

Noted. The Register of Landscapes of Historic Interest is listed in the full PPP review in Appendix 1 and the baseline in Appendix 2. No amendment required.

Noted. Those in bold type (as stated in paragraph 2.9.6) are those more likely to be chosen. Guidance does suggest identifying indicators linked to objectives during this stage of SA/SEA. The indicators will be developed throughout the process and need to be based on measurable criteria.

Some indicators have been selected according to the guidance and are therefore not always linked to an issue. These are included for information.

Noted. Indicators amended.

Noted. No amendment required.

to 'minimise the need to travel and encourage sustainable forms of transport'.

Economy – While the objective is broad enough to address the various issues identified in this section, the indicators do not relate to the issues. For example, the number of companies with Green Dragon accreditation is listed, but this does not relate to one of the issues detailed above. We suggest that information on Green Dragon companies is collected, only if there is an issue with carbon footprint amongst businesses. Similarly, the number of unoccupied sites in town centres is listed as a suggested indicator. This information would be extremely useful in the baseline data, and we suggest that if it is not available it is treated as an essential data gap to fill in the short term.

Climatic Factors – Some of the indicators suggested here are not relevant to the issues discussed in the topic. Indicators on night light and noise pollution should only be included if they are likely to be significantly affected by the plans, and this topic may not be the most relevant topic to present that information under.

Material assets – No indicators have been set on minerals. We suggest that this is revisited should significant effects be predicted. If quarries issue are included we suggest that consideration should be given to indicators relating to number of quarries available for recreation, wildlife and study.

Water – Once information on water resources has been reviewed, we suggest that water quantity is referred to in the objective. We also recommend a shift of emphasis in the wording of the objective on flooding away from reducing the impacts of flooding, to reducing the risk of flooding. We also suggest that the indicators should refer

Noted. No amendment required. Indicators are potential at this stage, not definitive.

Noted. No amendment required. Indicators were listed for information and are potential only. The final indicators will be selected appropriately.

Noted. Indicators are not final, and will be updated throughout the process as necessary.

Water quantity is referred to in Objective 13 which related to the efficient use of resources, which includes water. No amendment required. The flooding objective takes account of flooding and

	to the Water Framework Directive objectives of no deterioration, good ecological status (for surface waters) and good status (for groundwaters). <u>Soil</u>- Section 13.3.3. includes the recommendation that the objective incorporates the loss of agricultural land. We suggest that this is clarified to mean to promote sustainable agriculture throughout the area recognising the guardianship factor that agriculture has on our environment. <u>Biodiversity</u> – We have concerns about the choice of ‘number of visitors to nature reserves’ as an indicator of whether the objective ‘to protect and enhance biodiversity’ is being met. However, we would like to see the word ‘value’ added to the objective recognising that an important part of protecting and enhancing biodiversity is encouraging public awareness and enjoyment of biodiversity in the wider countryside, both of which are key roles of LDPs and CPs. In that case, we would support an indicator on the number of visitors to nature reserves. <u>Cultural heritage</u>- Similarly to the point above, we recommend that the word ‘value’ is added to the objective on cultural heritage given the presence of National Park within the CP’s area, and the LDP’s role to promote sustainable communities.	sea level rises. No amendment required. Noted. Indicators amended. Noted. Text amended. Noted. Objective amended to include ‘value’. Noted. Objective amended to include ‘value’.
EAW (Statutory Consultee)	We welcome the opportunity to comment on the Sustainability Appraisal and Strategic Environmental Assessment. Having reviewed the baseline data, we are satisfied that the relevant information has been supplied from Environment Agency Wales (EAW), however this is a continuous process and as we update our data sets we will make them available to you.	Noted. No amendments required. Noted. The baseline data will be amended throughout the process as new and updated information becomes available.

	We have reviewed Appendix 1 and we are happy that all necessary policies, plans and programmes are included. Our comments on the scoping report are as follows. We would wish to add that this is a well presented and straight forward document and thank you again for this opportunity. Topic Areas Section 2.10 We are happy with the list of topic areas. 3 - Population We are happy that the implications for the LDP mentions the need to ensure that housing and infrastructure are suitable for any growth or change in populations. 4 – Human Health Section 4.3.4 states “Minimise the health impacts from pollution”, this is not really followed through in to the objective and there is no indicator shown which could adequately monitor this. 8 – Economy Section 8.2.3 states “The lack of sewerage capacity data is an issue and development in some areas will be dependant upon updated sewerage infrastructure and upgraded/uprated waste water treatment works.” We are happy to supply data on any waste water treatment woks within the County.	Noted. No amendments required. Noted. No amendments required. Noted. No amendments required. Noted. No amendment required. Objective amended. Objective 2: Promote and improve human health and wellbeing through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment. Objectives 11 and 12 also refer to air quality and pollution. Data has been requested previously from EAW. The reply was to ask Dwr Cymru Welsh Water (DCWW). No information was provided from DCWW. Further information will be requested from EAW.
--	--	--

Section 8.3.4 states “The development of good quality infrastructure....are also incorporated in this objective” Unfortunately this does not appear to follow through into the objectives and again there is no indicator to monitor “good quality infrastructure”.

9 – Climatic Factors

Section 9.1.1, the review of plans, policies and programmes should include the Stern Review.

Section 9.2.1 Tan 15 suggests projections for sea level rises around the Welsh Coast of between 25cm and 30cm by 2050. We have consulted internally and confirmed that this figure is correct.

Section 9.3.2 states “Planning can also help the county adapt to the impacts of climate change through prevention of inappropriate development in flood risk areas and managing surface water run-off”, we are happy with this statement

Section 9.4 SA Objective, we are satisfied with this objective.

Section 9.5 Again we are happy with the potential indicators as it includes flood risk and surface water.

10 – Air Quality

We have attached a guidance note entitled “regulating to improve air quality, which should be taken into consideration.

Section 10.4 SA Objective, we are satisfied with this objective.

Noted and amended to read: The development of good quality infrastructure and broadband services is also an integral aspect to support a sustainable and diverse local economy.

Amended to add: Reduce CO2, early action for climate change, low carbon global economy (Stern Review)

Noted. No amendments required.

Noted. No amendments required.

Noted. No amendments required.

Noted. No amendments required.

Noted. Amendments made to Air Quality section in Appendix 2.

Noted. No amendments required.

11 – Material Assets

We are happy with this topic area, objectives and potential indicators.

12 – Water Quality, Quantity and flood risk

Section 12.1 review of plans, policies and programmes does not include the PITT Report

Section 12.2.2 states “some types of property are more sensitive to flooding than others” Please explain this statement.

Section 12.4 SA objective 15: “Reduce the impacts of flooding and sea level rises”
This should also include “surface water”.

Section 12.5 Potential indicators, these should include flooding from sewage, internal flooding.

13 – Soil

Section 13.2.1 Where has the agricultural grading system come from?

Section 13.2.2 states “There are areas of potentially high contaminated land associated with previous economic activity”, this comment is too vague.

Noted. No amendments required.

Amendments made to section 12.1 and Appendix 1.

Amendment to refer to residential and commercial properties.

Objective 15 encompasses all types of flooding - fluvial, tidal and surface water. Amendment made to section 12.3.3 to make clearer. Indicators added.

The grading information is from a map of agricultural land classification from the Rural Development Plan for Wales 2000-2006. The text has been amended to make it clearer that the soil grade refers to agricultural soils.

Noted. Text expanded.

	Section 13.3.2 refers to “water catchment management plans” whose plan is this as it is not referred to in the review of plans, policies and programmes. Section 13.4 SA Objectives. Objective 16 “use land efficiently and minimise contamination”. How do you define efficiently? It may be better to word it as no creation of contamination as opposed to minimise contamination. 14 – Biodiversity Section 14.4 SA Objective, we are happy with this objective	Noted, text corrected to refer to water catchments, not water catchment management plans. Efficiently refers to the use of brownfield land over greenfield land. And also refers to development densities. Noted. The objective takes account of the WSP objectives. No amendment necessary. Noted. No amendments required.
██████████ Cadw (Statutory Consultee)	1. The proposed methodology is appropriate. 2. Para 15.2.1 – There should be reference to Historic Landscapes on the Register of Landscapes of Outstanding and Special Historic Interest in Wales. There are 8 registered historic landscapes in the County of Pembrokeshire. 3. Appendix 2, Section 13. This should include information on the 8 registered historic landscapes in Pembrokeshire. All have been subject to landscape characterisation work by Dyfed Archaeological Trust. Summary information is available on their website and in detail as hard copy. Appendix 2, Section 13. Reference should be made to wreck sites designated under The Protection of Wrecks Act 1973. Of the 6 off Wales, one, The Smalls, lies off the Pembrokeshire coast.	Noted. No amendments required. Para 15.2.1 amended to include the four historic landscapes which are in or partly in the Pembrokeshire County Council plan area. The historic landscape areas are referenced in Section 13 under Landscape. Wording changed and reference to the Dyfed Archaeological Trust website added. Noted, the wreck sites are outside the plan area. Include additional text regarding any new wrecks found in the plan area.

4. Para 15.1.1 – The review should include Planning Policy Wales, 2002	Amended.
5. Para 15.4 – We suggest that the wording of Objective 21 is altered to read: “Protect and enhance the built heritage and historic environment.”	Amended.
The indicators selected should reflect the full extent and diversity of the historic environment and enable the effect of the plan on it to be measured. Pembrokeshire covers both rural areas and this should be reflected in the indicators selected – i.e. they should include reference to key aspects such as listed buildings, conservation areas, archaeological sites and scheduled monuments and historic landscapes, parks and gardens. We would suggest at least one indicator for each of these categories. The indicators should be worded in order to enable the effect of the plan to be demonstrated. For example:	
‘Number of sites designated for cultural heritage including archaeology’ should be revised to read ‘Number of sites designated for cultural heritage including archaeology affected by plan proposals ’	Amended.
‘Number of listed buildings adversely affected by plan proposals ’	Amended.
‘Length, presence of specific landscape features (hedgerows, stone walls) removed or restored ’	Amended.
Other indicators which could provide an immediate measurement of the impact of the LDP could include:	

	Scheduled Ancient Monuments (SAMs): • Percentage of SAMs in the Council's ownership having undergone positive management works over the lifetime of the LDP • Number of SAMs adversely affected by development plan proposals • Improvement/deterioration in the condition of monuments in the ownership of the Council Historic Landscapes, Parks and Gardens: • Measured area of land within the Historic Landscapes affected by new development • Number of historic parks and gardens adversely affected by development/plan proposals The report indicates on page 15 (para 2.9.6) that the indicators highlighted in bold are those considered most likely to adopted i.e. only two for the historic environment. The indicator 'Number/%age of buildings on the Buildings at Risk Register' would be a useful measure and we would support its adoption. The proposed indicator 'Percentage of land designated for landscape of historic garden' would, however, be of questionable use since it a more or less static figure and not directly linked to the effects of the LDP. 6. General Page 46, Table 2, Internal compatibility of SA objectives – There is more uncertainty of effects on the historic environment of some of	Amended. Amended. Amended. Amended. Amended. Noted and amended. Scoping report amended to reflect uncertainty between compatibility of Objectives 10, 15, 17 and 18 with
--	---	---

	the objectives than is suggested in the responses given in this table. While we would not suggest there is necessarily conflict between plan objectives, there will be a need to consider the implications of proposals such as objectives 10, 15, 17 and 18. For example, objective 15 'reduce the impact of flooding and sea level rises' – if this involves physical interventions such as sea wall or flood defences there could be implications for archaeology. Similarly, objective 10 'prepare for and reduce the impact of Pembrokeshire's contribution to climate change' needs to be carefully considered in terms of potential effects on archaeology and the built heritage – positive and negative. Also on the case of objectives 18 – while protection of biodiversity is often compatible with protecting the historic environment, this is not automatically the case.	Objective 21.
SWWITCH Co-ordinator	The Scoping Report is well laid out and thorough in approach. Objective number 4 (relating to transport) is extremely ambitious bearing in mind the EU/National and Welsh Assembly Government emphasis on improving GDP and increasing the percentage of economically active in society. This is likely (especially in a relatively rural area) to result in more travel. The Assembly's Transport Strategy (WTS) and the draft Regional Transport Plan (RTP) for South West Wales, recognise that the emphasis should be on minimising demands on transport networks and encouraging more use of sustainable modes. The objective is also at odds with section 6 and 6.3.2 which recognises the need to improve the road infrastructure which inevitably induces more travel. The wording of the objective would be more appropriate as <i>"Encourage more sustainable access to services and facilities and increase efficiency of transport networks"</i>.	Noted. No amendments required. The Wales Spatial Plan recognises the issue of minimising car use through the design of new development (for example through controlled parking measures, provisions for walking and cycling, easy access to public transport links). The RTP also recognises the need for reducing reliance on private cars. Objective 4 incorporates the ways in which planning can influence car use – through design, public transport etc. The need for improvements to the road infrastructure was identified as part of the previous CP. The WSP takes account of the WAG led trunk road improvement

	In 6.1.1 a critical objective from a document review would be “more efficient use of current networks”, as outlined above this is included in both the WTS and draft RTP. In 6.3.3 the first and last bullet points are very similar and could be incorporated into one bullet point. In 6.3.5 – some of these indicators would prove time consuming and costly to collect, it may be more appropriate to link to the RTP monitoring as it develops regionally and then adopt fewer sub regional targets. Section 16 table 2 – if the transport and access objective score a “tick” against objectives 1, 2 & 3, then why not 8, 9. they are all fields where providing and improving access can facilitate involvement and take up. Appendix 1 – the reference to Safe Routes to Schools is no longer correct, the focus of WAG attention and grants is now a wider scheme called “safe routes to communities”. Additional information sources: Appendix 2 – SWWITCH holds data which could be useful in the context of the SWWITCH Travel Pattern Research project (which is statistically valid to LA level) which includes modal splits and much more and also the RTP draft SEA. This data is freely available to all SWWITCH Councils.	programme. Amended PPP review to include “more efficient use of current networks”. Amended into one bullet point. Amended to include reference to development of RTP monitoring measures. Amended to reflect these comments. Amended - Appendix 1 now includes reference to Safe Routes in Communities” and “Safe Routes to Schools” has been deleted. Further information from SWWITCH has been included. Data will be updated throughout the process.
Pembrokeshire Coast National	We welcome this opportunity to comment on the Sustainability Appraisal Scoping Report and, having been through this process	Noted. No amendments required.

Park Authority	ourselves, recognise the effort involved in its preparation. We feel that the report represents a thorough examination of the sustainability issues facing the Planning Authority area. The following comments indicate areas of relevance to the Pembrokeshire Coast National Park where we feel that the Scoping Report could be improved. General point. This Sustainability Appraisal covers both the LDP and Community Plan. The Community Plan is relevant to the whole of Pembrokeshire, including the National Park. However, in places the scoping report specifically excludes the National Park when considering evidence and issues (for example: paragraphs 3.2.1; 14.2.1; 15.2.1). In order to properly assess the sustainability of the Community Plan, its sustainability in the area of the National Park also needs to be considered. Therefore, the scoping report needs to include evidence and issues for the National Park area, or, alternatively, assess the sustainability of the Community Plan against the Sustainability Objectives for the Sustainability Appraisal of Pembrokeshire Coast National Park Authority Plans, as suggested in National Park Management Plans Guidance (CCW, 2007: Annex 1, paragraph 42 (page 39)). It is also likely that the sustainability of the Local Development Plan for the area of Pembrokeshire outside the National Park cannot be fully assessed without considering its impact on the National Park. Paragraph 2.3: <i>'The CP will be the overarching strategy for the authority area and provide a long-term strategic vision for Pembrokeshire and all its population ... '.</i>	The SA Scoping Report covers both the LDP and Community Plan, the next stage of the process will see separate SA Reports prepared for each plan. Baseline data will be updated throughout the process. Population now includes the Park population (paragraph 3.2.1). The biodiversity section will also be updated to widen the geographical area. The PCNPA will be a key stakeholder in production of both the LDP and Community Plan. The Community Plan will need to be considered against the PCNPA SEA/SA objectives – this will need to be carried out through the Community Plan group. Impacts of the LDP on the National Park will be considered throughout production of the SA Report. Text amended to take account of the National Park. Noted. Text amended in paragraph 2.3 to take account of the National Park Management Plan.
----------------	--	---

National guidance states '*In the case of the National Park authorities, their National Park Management Plan (NPMP) is the main document that sets out their future vision. It will therefore be important that the NPMPs and the community strategy mesh with each other.*' (see Local Vision, Statutory Guidance from the Welsh Assembly Government on developing and delivering community strategies, WAG, 2008: paragraph 2.37 (page 24)). This paragraph of the Scoping Report should recognise the role of the National Park Management Plan and its interaction with the Community Plan.

Paragraph 2.7.2

Given the general point above, it is probably not wise to use '*Pembrokeshire*' to refer to the area of the county outside the National Park. The Sustainability Appraisal needs to be able to refer to the area of Pembrokeshire outside the National Park, the National Park, and Pembrokeshire as a whole (both areas together).

Table 2: Dates for Pre-Deposit Participation: September 2006 - July 2008.

We think these dates are incorrect, or are drawn from the delivery agreement and fail to reflect subsequent delays in the process, as there does not seem to have been the engagement with various external stakeholders (including ourselves) we would expect during this stage.

Paragraph 7.4, Objective 7.

South Pembrokeshire has a distinctive English language culture. There is a risk that an objective that only identifies the Welsh language could ignore this distinctive English culture or (at worst) undermine it. An objective relating to language should recognise Pembrokeshire's distinctive geographic pattern of language and culture (and the dialects and customs therein) and aim to maintain it.

Noted. Text amended in paragraph 2.7.2 (now 2.8.2).

Noted. The Delivery Agreement, which has been agreed by WAG, allows for four months slippage. Footnote added to reflect this caveat. Stakeholder involvement is an ongoing part of the process.

Noted. The objective relating to the Welsh language is derived from the WSP Objectives and WSP SEA Objectives. No amendment required.

Section 15

Paragraph 15.1.1

Relevant plans policies and programmes should include:

- Environment Act 1995 (Section 62) as this sets out the obligations of public bodies with regard to National Parks
- Pembrokeshire Coast National Park Management Plan
- Pembrokeshire Coast National Park Local Development Plan

Though their absence is most striking when considering issues of cultural heritage and landscape, the latter two plans are also relevant more widely in the Sustainability Appraisal due to their relevance to the Community Plan, and their importance in establishing the impact of the PCC LDP and Community Plan in combination with other Plans, Programmes and Policies.

Paragraphs 15.2.1 to 15.4

It seems inappropriate not to consider the Pembrokeshire Coast National Park as a significant landscape and cultural asset in these paragraphs, particularly as the Community Plan covers this area. Likewise the National Park designation has significant implications for both the Community Plan and the LDP due to the obligations with regard to the National Park placed on Pembrokeshire County Council by Section 62 of the 1995 Environment Act.

Objectives 19 to 21 (and objective 18) are appropriate in terms of the environmental protection element of National Park purposes, but the way section 15 is drafted implies that they only apply in that part of Pembrokeshire outside the National Park. Therefore, any development on the edge of the National Park to the detriment of the National Park landscape; any inappropriate development pressure

Noted. Text amended. The PCNPMP and LDP have been included in the full review of plans, policies and programmes (Appendix 1 of the SA Scoping Report).

Noted. Text amended.

Noted. Text has been added to recognise the National Park designation. The objectives take account of the National Park designation.

	arising in the Park as a result of under provision in the area outside the park; or any inappropriate activity promoted in the National Park by the Community Plan could be regarded as sustainable and acceptable in the context of this Sustainability Appraisal. Including reference to the National Park in this section will add weight to the argument in paragraphs 15.2.1 to 15.2.3, that Pembrokeshire is a county of outstanding environmental and cultural assets; set out clearly and fully the implications of this for both Plans; and ensure that the National Park is given due consideration as the Sustainability Appraisal guides the development of the Community Plan and the LDP.	Noted. See above.
Head of Economic Development, Pembrokeshire County Council	A definition of larger business would be useful in para 8.2.2. I see no reference under the "economy" section to the particular attributes and planning regimes in respect of the Milford Haven waterway i.e. developments below Low Water, should this be highlighted? Similarly should the special planning arrangements for larger "national interest" energy developments be referred to? The need for an appropriate supply of employment premises is as important as an adequate supply of employment land as an aid to economic growth.	Amended, large businesses are those with 250+ employees. Planning below Low Water is not in the jurisdiction of the County Council. This is outside of the County Council jurisdiction. Indicator added to include employment premises.

Chair of The Environmental Network for Pembrokeshire	Comments summarised below are those forwarded by The Environmental Network for Pembrokeshire (TENP) Trustees. TENP generally support the breadth of the SA scoping. 1) The report fails to introduce the context in which the study is being carried out, namely the increasing concerns about the nature and form of unsustainable development and the likely and probable adverse impacts (eg climate change, food and fuel insecurity, biodiversity loss, etc). In other words the subject and significance of the report is not presented. 2) The first sentence of para 2.4 is critical and we wish to make 3 related points; a) we would suggest that a clear explanation should follow, in particular PCC should consider whether the phrase "to promote sustainable development" is sufficient or whether the specific phrase 'The purpose of the SA is to promote a Sustainable Pembrokeshire' is more appropriate and gives support to increasing the level of sustainability throughout the County by developing sustainable policies, plans and action and assessing and amending existing unsustainable policies and practices. b) The first sentence in para 2.4 should precede the SA objectives in para 1.3.1 in order to provide context.	Noted. No amendments required. The Scoping Report has been prepared according to a legal requirement to carry out Strategic Environmental Assessment and Sustainability Appraisal of land-use plans. The resultant process, structure and topics are defined by legislation and guidance. The purpose of SA is highlighted in guidance documents. This is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of land use plans. The detail and baseline provided are appropriate to the purpose of this SA/SEA of the Local Development Plan. SA/SEA of Community Plans is not a legal requirement, however, Pembrokeshire County Council are voluntarily carrying this out. The purpose of the SA Scoping Report is to address these plans only. Paragraph 1.3.1 is part of the non-technical summary, context is already
---	---	--

c) The nature and definition of sustainability adopted by the County Council is not clearly presented or discussed. TENP has adopted the definition and 5 principles developed by the UK Government and promoted by the UK Sustainable Development Commission (UKSDC) as we find that these provide a useful framework assessing and developing policy. The UKSDC is also promoting an advice note on Community Planning and we would urge the County Council to consider this especially as this was developed and published by WAG with the support of the UKSDC. Without a clear statement of what sustainability is it is difficult to select criteria against which the LDP and CP can be judged. Without this clarity there is a danger that the concept of sustainability will fall into disrepute as ambiguous and meaning everything and anything. TENP trustees feel that a more analytically disciplined approach is needed in order to develop and promote a clear understanding of concepts and terminology. This request is consistent with one stated purpose of the Sustainability Appraisal which is to 'promote Sustainable Development'.

3) The report does not, as the WAG/UKSDC advice note suggests it should, consider the dynamic inter-relationship between economic, environmental and social objectives and policies and the current impact of local policies, it simply says that 'objectives should be balanced between the economic, social and environment', page 15, but this is not explained. The WAG/UKSDC advice note points out that there is a tendency for decision makers to make 'trade-offs' between conflicting objectives but that this is no longer an appropriate response and that integration is required whereby all actions are environmentally, socially and economically sustainable and thereby sustainability will be achieved. Clearly there are tensions between

provided in this section.

Noted. Text added to the introduction to provide more information on sustainable development.

The Sustainability Objectives have been selected with the baseline situation and to address specific issues in the area. These objectives also have regard to the guidance, Wales Spatial Plan and sustainable development.

The approach adopted is according to WAG and UK guidance on Sustainability Appraisals.

Noted. No amendments required. The report has been prepared with regard to the guidance and the level of detail is useful for its purpose to LDP and CP preparation.

Noted. No amendments required. SA objectives have been developed from the baseline and issues in area. All options and policies will be subject to SA and

these three categories of policies and this has to be understood before SA criteria can be set. The WAG/UKSDC advice refers to these tensions and advocates that they are recognised and then resolved through debate. For example, what is the link and what tensions arise between policies to promote 'economic growth' (measured in GDP terms, presumably) and social policy to reduce poverty and debt, and climate change ?. The UK has seen growth in GDP but consumer debt is outstripping annual earnings and Pembrokeshire has a significant number of people experiencing deprivation and low income (Joseph Rowntree Research) in spite of massive EU investment and a series of major capital projects. Bio-diversity loss and threats to landscapes and the coastline is a key concern of local environmental groups and the tourist industry and the EU has called for a 'de-coupling' of economic development from adverse environmental impacts and also for sustainable production and consumption. A scoping report should refer to these tensions and policies, resolve them and the resulting objectives be expressed in the assessment criteria. This is not to suggest that the statutory sector in the County can solve all these problems however it seems to TENP Trustees that the County Council and statutory partners collectively have a significant role to play as employers, managers of building stock, landlords, purchasers of goods and services, policy makers and policy implementers (with powers, duties and resources) to support and help deliver the sustainability agenda across all policies and services. The very recent Local Government Association advice note provides guidance on how LAs can best tackle climate change within existing statutory powers. You may also wish to refer to the Barnsley Council web site as they received a public service award in 2007 for their innovative approach to Sustainability issues across all services.

Without clear problem definition and a clear understanding of the

where conflict occurs, appropriate mitigation and/or alternatives will be investigated.

tensions between policies and between objectives then assessment criteria and policies and plans are likely to be inappropriate and are likely add to existing tensions . For example, on page 14, the report seems to narrow the concern of the Sustainability Appraisal objectives to their effect on the environment as though this can be considered in isolation, yet Sustainability policy is much wider than environment policy and includes equity , governance, production and consumption .

4) Because of a lack of clarity about WHAT sustainability is the list of issues that have been selected, some of which are undoubtedly relevant, appears to be quite arbitrary, and their selection is not explained or justified. Equally worrying is the lack of an explanation of why the issues exist or how they enhance or threaten sustainability. This perceived weakness is not pursued in the SA, for example, paras 11.2.3 and 4, where reasons are not suggested, is it because of the rural nature of Pembrokeshire and therefore the disproportionate need to travel plus the high proportion of old and detached houses and hence heat loss or is it skewed by the nature of local industry ? Our concern is that there seems to be a random selection of **effects** without any investigation of **causes** and, importantly, the role of the statutory sector (PCC as the LPA and the CP partners) in influencing either . For example you indicate that an imbalance in the population profile is a problem. However the issue is later indicated to be the increasing demand being made on care and social services. This is confused thinking as the total number of older people is not a function of balance or imbalance (which is a matter of proportions) and it is not made clear what balance would be appropriate and why. Retaining or attracting more young people to the County will not change the number of older people, at least not in the short term. The issue, here, would seem to be one of the

SEA specifically relates to environmental impacts, however, the SA Scoping Report widens SEA to include SA (as suggested by WAG guidance) and therefore social, economic and environmental objectives are termed SA objectives.

The SA Scoping Report identifies issues from a review of the baseline, other plans and programmes and local issues as required by guidance (summarised in section 2.9.5 of the SA Scoping Report). The full baseline is described in Appendix 2 of the report and a summary of the issues and baseline are included in the SA Scoping Report.

relationship between jobs, wage levels and the availability of housing not population balance. We accept, however, that an increasing proportion of old people will have social implications, eg, school closure, and economic implications, eg reduction in local labour and skill supply, and increased pressure on support services . The lack of young people and their 'drift' out of the County has been an issue for many years and housing policy alone, especially one that relies upon the private sector to build affordable housing, has not and is unlikely to make a significant impact. IF the rhetoric of concern is not matched by policy and action then it may be unwise to mention the issue and base a criteria on it. .

5) The objectives that have been set for each issue are not measurable, as objectives should be. Is this due to a lack of base-line data , if so this should be made clear ?. Some have little meaning , e.g 'balanced population', 'build communities', 'support a sustainable and diverse economy', 'reduce impact on Pembrokeshire of climate change'. The term 'sustainable' seems to be used in many different ways and with different, and contradictory, meanings, hence these terms should be clarified. The absence of clear objectives to reduce CO2 emissions through a range of policies and actions seems to TENP to be a significant omission, especially as the PCC has signed the Climate Change Declaration (and will be subject to the Carbon Reduction Commitment in 2010). Some TENP Trustees feel that the County Council has not given as much weight to this declaration as it might.

6) Without the adequate analysis suggested above, and by the WAG/UKSDC advice note, the matrix presented on page 47 is uninformative. The table 'tests' each objective against the others and the result is expressed in a 'tick' or 'dash' to denote a relationship. It is astonishing to see that the outcome is that there is no

Objectives have been defined using guidance and with regard to the Wales Spatial Plan, and according to local issues.

Objective 10 relating to climate change will take account of greenhouse gases.

The matrix approach is carried out according to guidance. Alternative and mitigation of strategies and policies will be developed where necessary. Where a '?' is marked, there is uncertainty of

incompatibility or conflict at all between and across these objectives, ie no relationship, all can be achieved without conflict. We wonder what process and criteria were used to arrive at these conclusions. This question is particularly pertinent as national and local Governments across the UK and Europe are currently struggling to resolve contradictions between these same or similar objectives. It is simply not possible therefore for Pembrokeshire to be the exception unless the conclusions you draw are either due to ;

- a) the lack of clarity of the objectives, so that tensions are not illuminated,
- b) the lack of a strong evidence/data base so that contradictions cannot be identified, or ,
- c) the lack of an appropriate interpretation of the data available.

If the cause is one of a lack of data, then that should be highlighted, for example an objective could be : "to reduce the the ecological footprint of Pembrokeshire" which would require data to be collected and analysed in order for a realistic and measurable objective to be set. A date could be set for the data to be collected and then the measurable objective set. In the meantime any objectives that threatens to raise the ecological footprint should be identified as 'in conflict'. From this example it is clear that the lack of specific data does not prevent a conflict being identified and an objective being set to reduce or alleviate conflict.

With 25 indicators of 'uncertainty' we can only assume that more work needs to be done to clarify the nature and extent of uncertainty, either through data collection or more interpretation and analysis. The report admits that most 'uncertainty' relates to the relationship between most objectives and the economic growth and economic development objectives, (which are recognised nationally and internationally, in their current form, as a major contributor to

compatibility. There is always likely to be conflict between issues, which will be accounted for later on in the SA process.

Measuring an accurate ecological footprint of Pembrokeshire has not been undertaken; data have been collected from various sources, such as the Wales Spatial Plan.

The baseline data and issues have been developed in accordance with the guidance and is useful for its purpose*. Gaps in the data have been identified, and where new relevant data become available, these will be included in subsequent stages of the SA Report.

unsustainability). Therefore it is a major concern that it is being suggested in this report that these uncertainties can be resolved at a later date. The WAG/UKSDC advice note would no doubt describe these uncertainties as 'crunch' issues which need to be confronted rather than deferred. The questions that logically arise from our concern are; -When will these uncertainties be resolved ?, How ?, by Whom ?, How does this level of uncertainty impact on the SA and on the LDP and CP drafting process?, Is it the case that the production of the LDP and CP is likely proceed without these uncertainties being resolved?, if so, will a consultation process be repeated when these gaps have been filled ? and how will these uncertainties be accommodated in the plan making process ?

7) There seems to be a lack of detail and realism in sections of the report, for example;

a) Para 9.32 hints at what sustainable design and siting might be, however, we would prefer greater clarification through a declaration of principles, eg on the distribution of development such that new development is located in those settlements with essential services (schools, shops, post offices, etc) which are in walking/cycling distance. The issue of food security should be linked to settlement design and space standards through the size of residential gardens and/or the provision of allotments adjacent to towns and villages.

The consultation process for the LDP and SA is described in the Delivery Agreement. Consultation will take place at various stages and there will be opportunity for further comment.

* From SEA ODPM guidance:

- The information collected is relevant and appropriate to the spatial scale of the plan or programme.
- Information collection is focused on those aspects of the environmental character of the plan or programme area that are: (i) sufficient to identify the key environmental issues that are relevant to the plan or programme area; and (ii) aspects upon which the plan or programme may have a significant effect.
- The data and information collected is relevant to the SEA objectives and indicators.

The SA Scoping Report is at a level of detail required for the purpose. Specific policies, for example, relating to sustainable design, will be included in the relevant plan (e.g. the LDP).

b) The number of PI's seems very unrealistic and in some cases seem to overlap or duplicate (para 3.5, points 7 and 8) or are imprecise (para 7.5) , or do not seem to relate to rural settings (is the road collisions PI a rural county based figure? - give per 000 population for comparison).

c) A number of PIs are **bold**, but it is not clear what this means, are they 'key' and if so why ?

8) The comments above have focussed on the approach to the Sustainability Appraisal and has expressed concerns about weaknesses and omissions. There is one final point which TENP wishes to raise and that is on the principle of 'inclusive governance' , one of the 5 UKSDC principles of Sustainable Development. Whilst we appreciate the opportunity to provide comments the period for consultation has been very short, 5 weeks, during the holiday period, which gives voluntary groups very little time to organise a coordinated response. TENP would like to suggest that this shortcoming could be overcome by having regular informal meetings between the sectors with the discussions informing both PCC policy making and the formal statutory consultation process for statutory plans such as the LDP and CP . This would enable PCC staff to draw on the knowledge and expertise of the voluntary sector on a regular basis which would ensure that any contentious issues or misunderstanding could be resolved before the statutory process. We believe that such an approach would result in productive and mutually supportive engagement and better outcomes. If you refer to the Barnsley Council web site you will see

The indicators are suggested by the guidance and other sources. Indicators can be developed throughout the process and need to be based on measurable criteria. The indicators are potential at this stage, with those in bold type (as stated in paragraph 2.9.6) are more likely to be chosen.

See comment above.

Noted. No amendments required. The time limits for consultation are determined by the SEA Regulations - The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (Welsh Statutory Instrument No 1656 (W 170)).

There are opportunities for consultation at various stages of the LDP and SA process. The LDP programme, which includes consultation exercises with external groups, is set out in our Delivery Agreement which has been agreed by

	that they organise regular discussion forums and, under the LA21 initiative in the late 1990's, many LAs adopted a similar approach. 9) To summarise, TENP is concerned about ; - the lack of a clear definition and explanation of SD - the lack of SD principles to act as a framework for analysis, - weak issue selection and analysis, - a poor data and evidence base for judgements and decisions, - methodological shortcomings (the application of the matrix and the 'uncertainty' attached to economic growth and development objectives), - the lack of inclusive governance. Forwarded to you the WAG/UKSDC advice note on Community Plan production.	the Welsh Assembly Government. There is the opportunity for commenting on the developing LDP, SA and SEA as the programme progresses. The Community Plan also has a group which will include stakeholder and community involvement. Noted. See comments above. Noted. No amendments required.
--	--	--