

SUSTAINABILITY APPRAISAL TARGETS AND INDICATORS CONSULTATION

(12th November 2008 until 18th
December 2008)

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1.0 SUMMARY OF PROCESS

1.1 In order for a Monitoring Strategy to be prepared that will observe the sustainability effects of the Local Development Plan (LDP), the Council has developed and consulted on an up-to-date set of targets and indicators, that will meet monitoring requirements for both the LDP and the Sustainability Appraisal (SA) process.

STAGE 1 – SUSTAINABILITY APPRAISAL (SA) TARGETS AND INDICATORS CONSULTATION

Purpose:

To seek the view of neighbouring local authorities in SE Wales, consultees, members of the public and internal Council departments on the revised list of targets and indicators (a list of all consultation bodies consulted on the SA targets and indicators is available to view in Appendix 1).

Process:

A covering letter, representation form, briefing note and revised list of SA targets and indicators was available to view on the Council website, in Council owned libraries across Rhondda Cynon Taf and was also sent to neighbouring authorities and consultees listed in Appendix 1.

Output:

To efficiently monitor the sustainability effects of the LDP and SA process.

2.0 INTRODUCTION

2.1 In early 2006 a scoping process for the Sustainability Appraisal (SA) was carried out to ensure the SA covered key sustainability issues relevant to the development planning system in Rhondda Cynon Taf. The scoping process not only developed an understanding of key sustainability problems, issues and opportunities, but also acknowledged wide recognition of the current and predicted social, economic and environmental characteristics of Rhondda Cynon Taf.

2.2 An SA Framework was compiled which included a list of 16 SA Objectives that aim to resolve the problems and issues identified in the previous scoping exercise. The key sustainability issues in Rhondda Cynon Taf and the draft SA Framework were debated and agreed at a Technical Workshop with key stakeholders in January 2006. This approach and proposals for minimising the sustainability impact in the Local Development Plan (LDP) were presented in an SA Scoping Report in March 2006.

2.3 The Planning Act (2004) and the SEA Directive require a Monitoring Strategy to be prepared that will observe the sustainability effects of the Local Development Plan (LDP). The Council have developed an up-to-date set of targets and indicators that will meet monitoring requirements for both the LDP and the SA process. The Council have reviewed the existing 48 SA targets and indicators in line with the 2007 Rhondda Cynon Taf Improvement Plan, the sustainability issues identified in the SA Scoping Report and the SA of the Preferred Strategy, in order to produce a smaller and more

manageable list of 21 SA targets and indicators that are more specific to issues in Rhondda Cynon Taf.

2.4 Sustainability Appraisal (SA) Targets and Indicators Consultation

2.5 A consultation on the 21 SA targets and indicators commenced on Wednesday 12th November 2008 for five weeks until 5pm on Thursday 18th December 2008.

3.0 SUSTAINABILITY APPRAISAL TARGETS AND INDICATORS CONSULTATION

3.1 On the 10th November 2008 the information listed below was delivered to libraries and sent to consultation bodies outlined in Appendix 1. The following information was also available for comment on the Council's website (<http://rhondda-cynon-taff.gov.uk>):

- Covering letter;
- Letter to libraries;
- Briefing note to SA targets and indicators;
- List of revised SA targets and indicators
- SA targets and indicators representation form.

Covering Letter:

+		Please ask for: Miss R. Stephens	
		Gofynnwch am: 01443 495195	
Our Ref:		Your Ref:	Date: 10th November
Ein cyf:		Eich cyf:	Dyddiad: 2008

Dear Sir/Madam,

Rhondda Cynon Taf Local Development Plan: Sustainability Appraisal: Targets and Indicators Consultation

As part of the Local Development Plan (LDP) process Rhondda Cynon Taf County Borough Council are undertaking a consultation on the Sustainability Appraisal (SA): Targets and Indicators. Please find a copy enclosed.

The SA: Targets and Indicators Consultation will commence for five weeks on **12th November 2008**. Representation forms should be completed and returned to **Development and Regeneration, Rhondda Cynon Taf County Borough Council, Floor 5, Ty Pennant, Mill Street, Pontypridd, CF37 2SW** no later than **5pm on the 18th December 2008**.

Should you wish to discuss the consultation or have any further queries relating to the LDP process, please do not hesitate to contact me on the above telephone number.

Yours sincerely,

Nicola Gulley
Spatial Development Manager

Letter to Libraries:

Our Ref:	Your Ref:	Date:	10th November
Efn cyf:	Eich cyf:	Dyddiad:	2008

Dear Colleague,

Rhondda Cynon Taf Local Development Plan: Sustainability Appraisal Targets and Indicators Consultation

As part of the Local Development Plan (LDP) process the Council will shortly be undertaking a public consultation on the Sustainability Appraisal (SA) Targets and Indicators. As part of this process, we have informed people that the attached **Sustainability Appraisal Targets and Indicators Consultation Pack and Representation Forms** is available to view in all the libraries across the County Borough.

I would be grateful if you could keep the attached document available to view at your main reception desk. Additional copies of the pack and accompanying representation forms are available from the Council on request.

Please do not hesitate to contact the Development Planning team direct on **01443 495193** if you need any further information or if there are any enquiries your staff are unable to deal with.

Many thanks for your assistance.

Yours sincerely,

Nicola Gulley
Spatial Development Manager

Briefing note to SA targets and indicators:**1.0 Sustainability Appraisal (SA) Targets and Indicators**

In early 2006 a scoping process for the Sustainability Appraisal (SA) was carried out to ensure the SA covered key sustainability issues relevant to the development planning system in Rhondda Cynon Taf. The scoping process not only developed an understanding of key sustainability problems, issues and opportunities, but also acknowledged wide recognition of the current and predicted social, economic, and environmental characteristics of Rhondda Cynon Taf.

A SA Framework was compiled which included a list of 16 SA Objectives that aim to resolve the problems and issues identified in the previous scoping exercise. The key sustainability issues in Rhondda Cynon Taf and the draft SA Framework were debated and agreed at a Technical Workshop with key stakeholders in January 2006. This approach and proposals for minimising the sustainability impact in the Local Development Plan (LDP) were presented in a SA Scoping Report in March 2006.

2.0 Monitoring the Implementation of the Local Development Plan (LDP)

The Planning Act (2004) and the SEA Directive require a Monitoring Strategy to be prepared that will observe the sustainability effects of the Local Development Plan (LDP). The Council have developed an up to date set of targets and indicators that will meet monitoring requirements for both the

LDP and the SA process. The Council have reviewed the existing 48 SA targets and indicators in line with the 2007 Rhondda Cynon Taf Improvement Plan, the sustainability issues identified in the SA Scoping Report and the SA of the Preferred Strategy, in order to produce a smaller and more manageable list of 21 SA targets and indicators that are more specific to issues in Rhondda Cynon Taf.

3.0 Sustainability Appraisal (SA) Targets and Indicators Consultation

Illustrated below, in Council Libraries and on the Council's website (<http://rhondda-cynon-taff.gov.uk>) are the updated 21 SA targets and indicators that will monitor the main sustainability effects of the LDP and the SA. A consultation on the SA targets and indicators will commence on **Wednesday 12th November 2008** and last for 5 weeks until **Thursday 18th December 2008**.

Rhondda Cynon Taf County Borough Council will be inviting comments and suggestions on the SA targets and indicators and has therefore attached a representation form to be completed and returned to **Development and Regeneration, Rhondda Cynon Taf County Borough Council, Floor 5, Ty Pennant, Mill Street Pontypridd, CF37 2SW** to be received no later than **5pm on 18th December 2008**.

List of revised SA targets and indicators:

SA Target	SA Indicator
1. Housing	
Reduce discrepancies between requirement and availability of affordable and special needs housing stock.	Number of new affordable housing units provided during the year as a percentage of all new housing units provided during the year
2. Culture and Heritage	
Reduce number of buildings on at risk register (year on year) (target could also include scheduled ancient monuments & number of conservation areas reviewed)	Buildings at Risk (absolute number)
Maintain/ protect locally designated sites of cultural value and areas of high archaeological value	Number of Designated Sites with Management Plans

SA Target	SA Indicator
3. Communities	
Improve access to public transport and community facilities for all	Percentage of total population with access to services
Increase % of people with qualifications and improve skills	Number of enrolments on adult education courses per 1000 population % of 15/16 year olds achieving the 'core subject indicator' (grade C in GCSE English or Welsh and Science in combination)

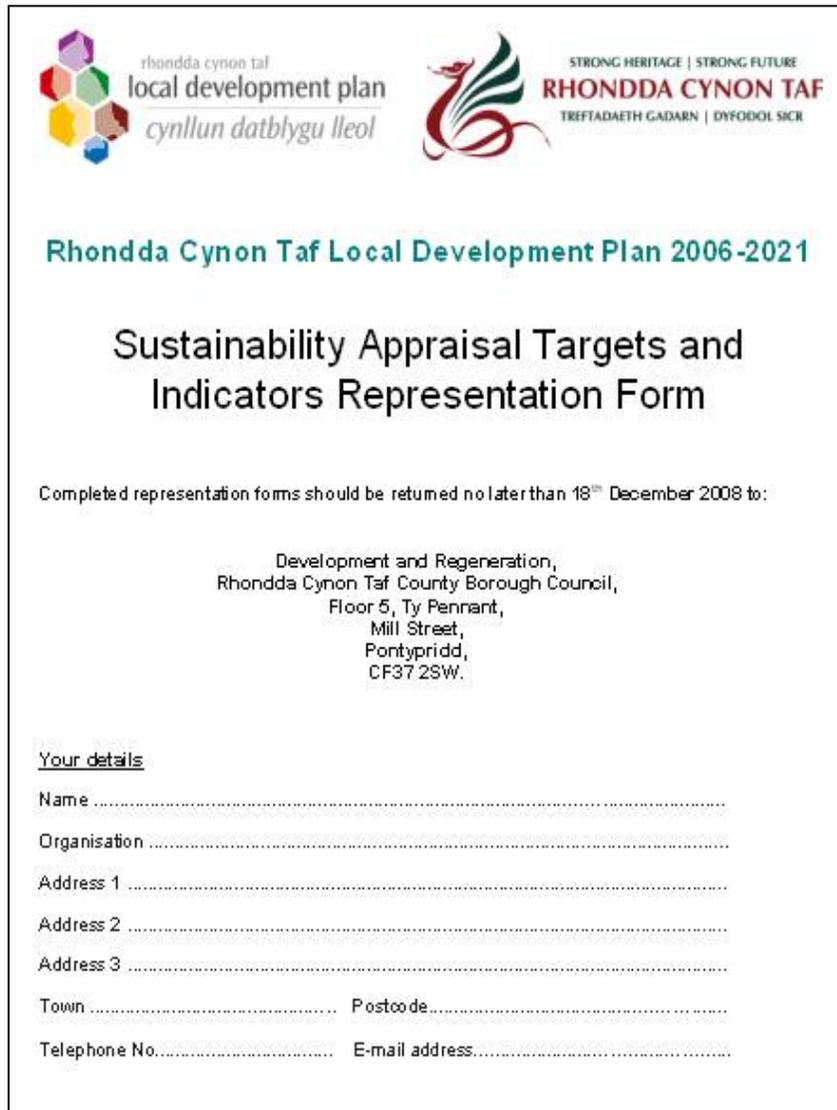
SA Target	SA Indicator
4. Health	
Increase access to recreation and sports facilities	Number of visits to indoor and outdoor sports and recreational facilities per 1000 population
5. Economy	
Broaden the Economic base by creating more varied and stronger businesses	Economic activity by sector
6. Employment	
Increase opportunities to work within the district.	<p>[%] increase in local job growth by sector/ reduction in numbers of economically inactive</p> <p>[%] of resident working age population employed</p>

SA Target	SA Indicator
7. Transport	
All new developments located to support and encourage sustainable travel choices	% [or absolute number of] development that delivery sustainable transport solutions
8. Built Environment	
Promote improved design standards and encourage community participation in the planning process	% (or number of) new developments and buildings meeting BREEAM and/or Code for Sustainable Homes Standards
9. Landscape	
Achieve favourable conditions of nationally and locally important landscape designations	% designations reporting favourable condition status
10. Biodiversity	
Protect and enhance biodiversity and geodiversity of the area	% change in RCT BAP priority habitats and species

SA Target	SA Indicator
11. Water	
Promote sustainable water resource management	% [or number of as proportion of total] of new development with integrated sustainable drainage systems
Reduce Flood risk to people, property and maintain integrity of the floodplain	Amount of development in C1 and C2 defined by TAN 15
12. Climate Change	
Reduce greenhouse gas emissions	% change in carbon dioxide emissions in the housing stock
13. Energy	
Improve energy efficiency and maximise the use of renewable energy	% reduction in energy use in housing stock
Encourage energy efficient design in development	% [or number of as proportion of total] new developments and buildings meeting BREEAM and/or Code for Sustainable Homes Standards

SA Target	SA Indicator
14. Land and Soils	
Increase proportion of development on previously developed land	The number of new housing units provided during the year on previously developed land as a percentage of all new housing units provided during the year.
15. Waste	
Reduce tonnage of waste to landfill	% of municipal wastes sent to landfill
Move Waste up the Waste Hierarchy	% of municipal waste reused and/or recycled
16. Minerals	
Increase % of secondary and recycled aggregate sources in all developments	% use of aggregates from secondary and recycled sources

SA targets and indicators representation form:



The form features logos for 'rhondda cynon taf local development plan cynllun datblygu lleol' and 'RHONDDA CYNON TAF STRONG HERITAGE | STRONG FUTURE TREFTADAETH GADARN | DYFODOL SICR'. The title is 'Rhondda Cynon Taf Local Development Plan 2006-2021 Sustainability Appraisal Targets and Indicators Representation Form'. It includes a deadline of 18th December 2008 and contact information for the Development and Regeneration department. A 'Your details' section contains dotted lines for Name, Organisation, Address 1, Address 2, Address 3, Town, Postcode, Telephone No., and E-mail address.

Q1. Please use the space below to write your representation to the Sustainability Appraisal (SA) targets:

Target Number(s):

Representation:

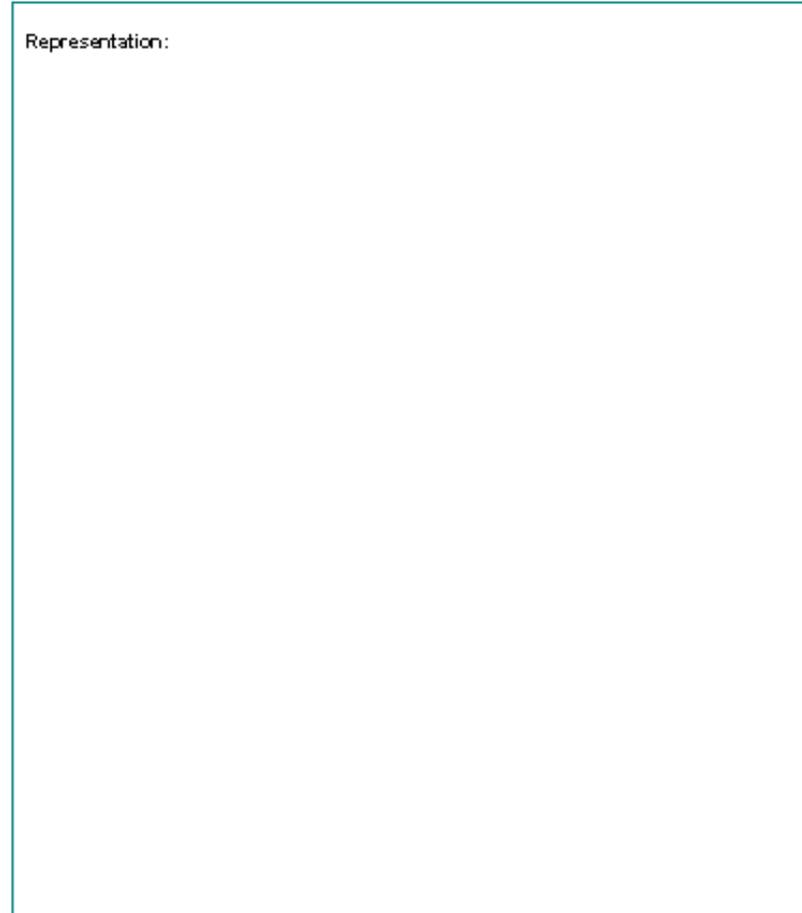
Q2. Please use the space below to say what changes (if any) you would like to be made to the Sustainability Appraisal (SA) targets:



Q3. Please use the space below to write your representation to the Sustainability Appraisal (SA) indicators:

Indicator Number(s):

Representation:



Q4. Please use the space below to say what changes (if any) you would like to be made to the Sustainability Appraisal (SA) indicators:



Thank you for taking time to complete and return this questionnaire

4.0 RESULTS OF SA TARGETS AND INDICATORS CONSULTATION

4.1 Of the 14 consultation bodies and neighbouring authorities that were consulted on the 21 SA targets and indicators; 2 responses were received. A further 3 responses were received from residents in Rhondda Cynon Taf.

4.2 Below are the 5 representations received on the SA targets and indicators consultation:

1. Environment Agency Wales

Target: There is no SA target regarding air quality. RCT is an Air Quality Management Area.

Change: Include a target for air quality to read: 'Improve air quality'.

Indicator: There is no SA indicator regarding air quality

Change: Include an indicator that measures the decrease in the pollutant(s) that the Air Quality Management Area (AQMA) has been declared for. This is from Defra's air quality indicators.

Target 11 – Water

Target: There is no SA target for improving water quality

Change: Include the SA target: 'Improve water quality'

Indicator: There is no SA indicator for improving water quality

Change: Include the following indicators:

'% of total classified river length complying with water quality objective (GQA: General Quality Assessment), or of 'good' status'.

And,

'% of total classified river length complying with RQO/RE (River Quality Objective/River Ecosystem) target'.

The Environment Agency collate and issue this data. This is currently done under the General Quality Assessment (GQA), but will be superseded within the next 2-3 years by the Water Framework Directive (WFD).

Target 11 – Water

Target: The SA Target wording ‘promote sustainable water resource management’ is not appropriate for the SA indicator

Change: We advise the word ‘resource’ is deleted and the word ‘surface’ is inserted before water to read: ‘Promote sustainable surface water management’.

Target 11 – Water

Target: The target: ‘reduce flood risk to people, property and maintain integrity of floodplain’ is not appropriate and does not relate directly to its indicator.

Change: We recommend the SA target is deleted and replaced with: ‘avoid development in flood risk areas’.

Indicator: The indicator is not appropriate for the target. The amount of development in C1 and C2 does not directly relate to reducing flood risk to people and property, particularly to those already living in at risk areas.

Change: We recommend the SA indicator is replaced with: ‘number of as proportion of total of new development allowed in C1 and C2 contrary to TAN 15’.

2. Countryside Council for Wales (CCW)

CCW roughly supports the overall scope of the refined targets and indicators. Detailed comments are set out below:

Target/Indicator 3 – Communities

CCW welcomes the inclusion of an indicator for access to public transport and community services but there is no measure of quality of the services to be accessed within the indicator. While this is beyond the scope of the table, it should be considered when developing the detail of the monitoring plan for the LDP/SA/SEA.

Target/Indicator 4 – Health

CCW are disappointed that this target and indicator do not also include a specific reference to the ‘countryside’ or ‘natural environment’ in line with the Accessible Natural Green Space Assessment that was carried out in RCT on behalf of CCW and the Heads of the Valleys Programme.

Target/Indicator 7 – Transport

CCW welcomes this indicator, but would encourage RCT to develop more detail for the indicator within the final monitoring plan (for example the number of new developments with Travel Plans, Home Zones, car clubs etc).

Target/Indicator 8 – Built Environment

CCW welcomes the inclusion of BREEM/Sustainable Homes Standards in the indicator, but would also encourage cross-reference to the 'energy' indicator 13.

Target/Indicator 9 – Landscape

While CCW support and encourage the inclusion of a landscape indicator, CCW would also welcome clarification on how 'favourable condition status' will be measured or made responsive to the plan. The European Landscape Convention sets out the necessity of enabling landscapes to evolve and it may be useful to reference both this and the recent work carried out by the Heads of the Valleys Programme on developing a landscape framework in the more detailed monitoring programme.

Target/Indicator 10 - Biodiversity

CCW welcomes the inclusion of a specific biodiversity target and indicator and their link to the RCT Biodiversity Action Plan. However, CCW are unsure what is meant by '% change' in this context and would recommend clarifying whether this relates to percentage increase in area of habitat and/or numbers of BAP species and how it is reactive to the plan.

An alternative/additional indicator might be to look at how the Plan will contribute towards achieving better ecological functioning, for example, through enhancing ecological connectivity.

Target/Indicator 11 – Water

CCW welcomes the inclusion of a sustainable water resource management target and welcome the use of SuDS as an indicator. Ideally, CCW want to see the percentage of schemes incorporating SuDS to increase on a year-by-year basis and the inclusion of some measure of water supply/usage/reduction. CCW particularly welcome the target of maintaining the integrity of the floodplain.

Targets/Indicators 12 and 13 – Climate Change and Energy

CCW believe that indicators chosen for these two targets are closely related and also linked to Target 8. CCW would have liked to see reference to energy strategies within one of these indicators (which would cover both energy use/conservation and provision). Similarly, while % reduction in CO2 emissions in the housing stock may be reactive to the plan, CCW believe it is somewhat limited in scope compared to the potential capacity of the plan to both minimise green house gas production and also show how the County Borough intends to adapt to climate change effects.

Target/Indicator 14 – Land and Soils

CCW welcome the inclusion of a target and indicator for soils, however, while this is an acceptable indicator for quantity (providing it is suitably qualified, for example, if gardens are classified as 'previously developed' or 'brown field' land then in-filling can effectively decrease the amount) CCW would wish to see an indicator for 'quality' as well, possibly through the

requirement of new developments to have a soil management plan.

3.

Resident of Rhondda Cynon Taf:

Target/Indicator 3 – Communities

In agreement with proposed target and indicator. No change specified.

Targets 4 – 16:

Requirement for further consultation with regards the aforementioned targets and indicators.

No representation or change to SA targets and indicators specified.

4.

Resident of Rhondda Cynon Taf:

Target 1 – Housing

Target: The availability of affordable homes is provided by several methods. Social landlords undertaking new builds, Section 106 agreements with developers and bringing back to use older housing stock.

Change: No change specified

Indicator: An overall indicator is meaningless if no account of how the houses have been provided isn't incorporated into the calculation. The LDP was also formulated giving a certain mix of tenures and an attempt at measuring this against supply should be undertaken.

Change:

Amend to the following:

Social landlords = supply of affordable homes

Section 106 agreements = supply of affordable homes

Old housing stock = supply of affordable homes

Total as a percentage of total houses built

Indicator 4 – Health

Indicator: No attempt to capture the number of people who just enjoy the open air

Change: In addition to number of visits members of walking clubs and rambler groups.

Indicator 5 – Economy

Change: An additional indicator on the number of new jobs created / no of jobs lost.

Indicator 11 – Water

Indicator: Floodplain is an area of land and no attempt has been made to quantify this. Also it should be cross-referenced to the major rivers in RCT.

Change: An additional indicator on the area of floodplain lost per river catchment

Indicator 14 – Land and Soils

Indicator: No attempt to incorporate the size of the development. The available land is not finite and should be expressed as acres or hectares. Large proportions of developments are used for infrastructure or possibly leisure and therefore the size of the whole development should be taken into account, not just the houses provided.

Change: An additional indicator on the number of sites on previously developed land in hectares / total number of development sites in hectares.

5.

Resident of Rhondda Cynon Taf:

Target 1 – Housing

Target: Housing is supplied in a number of ways, new build both private and developer led, private owner occupation, social and other landlords, 106 agreements, refurbishments, etc. These

have to be quantified separately in order to assess an overall need before providing; otherwise you create more unneeded properties.

Change: What is the point of putting houses where transport (especially roads) is bad, every project needs to be assessed as to its viability and correct provision for the community concerned.

Target 2 – Culture and Heritage

Target: There are very few remaining historic buildings in the Rhondda. The LDP is advocating the reduction of conservation areas in the plan in contradiction to this proposal.

Little is being done to preserve the landscape and archaeology in the Rhondda Fawr. More needs to be done to identify areas and designate them as areas of outstanding beauty, to protect them against development.

Change: Much more attention is needed here, most of our archaeological sites are neglected and buildings destroyed.

Target 3 – Communities

Target: Increase wealth and health with better, well-paid jobs and improved facilities and services.

Change: Prevent area boundaries forcing facilities into adjoining areas to improve figures.

Target 4 – Health

Target: Sports and recreation are not the best markers, many people take alternative exercise. A better marker would be the number of visits to doctors per head of population and the number of hospital visits for health problems.

Change: Health is regulated by living standards. This can only be improved by better well-paid jobs and better healthcare and services to the sick. Sports are not indicators of health.

Target 5 – Economy

Target: The roads need major upgrading to entice any prospective boost in the economy of the Rhondda, north of Pontypridd.

Change: Yes

Target 6 – Employment

Target: New business needs new communication roads. Little plans seem to be forthcoming to improve the situation for jobs within the community, so travel to other areas is essential.

Change: Bring better well paid jobs up the valleys.

Target 7 – Transport

Target: As per Target 6. Too many houses and not enough jobs.

Change: Roads need major improvements.

Target 8 – Built Environment

Target: Well-designed offices, laboratories, science parks and factories etc near the housing, must be matched with transport integration.

Change: Addressed in LDP Evidence Base.

Target 9 – Landscape

Target: Agree, but this requires identification of the landscapes.

Change: Encourage tourism to the Rhondda Fawr and designate the area one of Outstanding Natural Beauty and geological importance.

Target 10 – Biodiversity

Target: Agree

Change: Allocate a country park in the Rhondda

Target 11 – Water

Target: Concern expressed on allowing developers to raise ground levels to put flood plains out of C2 category areas. The flooding is only passed downriver to endanger other sites.

Change: Concerns regarding development on floodplains.

Target 12 – Climate Change

Target: More needs to be done, for example tree planting and other active measures.

Change: Wider issues need to be addressed.

Target 13 - Energy

Target: Access untapped energy, for example water power and tidal.

Change: Use alternative thinking, for example hydro, wave and solar power.

Target 14 – Land and Soils

Target: Every site must be properly assessed. Concern expressed with developing on brownfield land.

Change: Concern expressed on the continual emphasis of the SA targets and indicators on monitor residential development.

Target 15 – Waste

Target: Remove cost of disposal to prevent fly tipping.

Change: Set up a recycling research centre to pool technology and source the best methods of disposal/recycling.

Target 16 – Minerals

Target: Agree.

Change: Sites should be investigated, categorised and used to best advantage, including restoration to recreational areas.

5.0 CONCLUSION

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**APPENDIX 1 – SA TARGETS AND INDICATORS
CONSULTATION BODIES**

Neath and Port CBC
Bridgend CBC
Cardiff CBC
Vale of Glamorgan CBC
Merthyr Tydfil CBC
Caerphilly CBC
Blaenau Gwent CBC
Torfaen CBC
Newport CBC
Countryside Council for Wales (CCW)
Environment Agency
Forestry Commission
Cadw
Welsh Assembly Government (WAG)