

Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan

Initial ISA Report - Non Technical Summary

Vale of Glamorgan Council

October 2023

Quality information

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1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Integrated Sustainability Appraisal (ISA) in support of Vale of Glamorgan Council's (VOGC) Replacement Local Development Plan (RLDP). ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WCFG).

ISA Explained

- 1.1 ISA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the developing plan's contribution to sustainable development.
- 1.2 As identified above, the ISA seeks to fulfil the requirements and duties for SA, SEA, EqIA, HIA, WLIA and WCFG. The approach is to fully integrate these components to provide a single assessment process to inform the development of the RLDP.

The Initial ISA Report

- 1.3 This Initial ISA Report is published alongside the Preferred Strategy. Any representations received will be considered and a revised ISA Report will be published subsequently alongside the Deposit Plan.

What is the Preferred Strategy seeking to achieve?

- 1.2 VOGC is currently in the process of preparing the RLDP, which will replace the existing LDP and help shape the Vale of Glamorgan for the next 15 years (to 2036).
- 1.3 The RLDP will set out the vision, objectives, strategy and policies for managing development in the Vale of Glamorgan, and will contain a number of local planning policies. The RLDP will set out land use development proposals for the Vale, including for the purposes of housing, employment, retailing, recreation, transport, tourism, minerals, waste, and community uses.
- 1.4 The RLDP will also identify areas to be protected from development and provide policies against which future planning applications will be assessed. It will be prepared with regard to a wide range of legislation, policies and other initiatives at the European, national, regional and local level. The Local Well-Being Plan 'Our Vale – Our Future' (LWBP) will be of particular importance at the local level. The LWBP relates to the economic, social, environmental, and cultural well-being of the Vale of Glamorgan and has clear links with the RLDP where it relates to land use planning.

What is the scope of the ISA?

- 1.4 The Regulations require that “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”. In Wales, the consultation bodies are Natural Resources Wales and Cadw. A Scoping Report was sent to the statutory consultees for comment from August to September 2022. The responses received were considered and amendments made to the baseline information and draft ISA Objectives where necessary. Since that time, the ISA scope has evolved as new evidence has emerged and there have been some minor refinements to the ISA objectives - however, the scope remains fundamentally the one agreed through the dedicated scoping consultation in 2022.
- 1.5 Table 1.1 presents the ISA objectives - grouped under ten topic headings - established through scoping, i.e. considering context/baseline review, identified key issues and responses from statutory consultees.
- 1.6 Taken together, the ISA topics and objectives presented in Table 1.1 provide a methodological ‘framework’ for appraisal.

Table 1.1 ISA framework

ISA topic	ISA objective
Economy and employment	<ul style="list-style-type: none"> Support a sustainable, diverse, and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.
Population and communities	<ul style="list-style-type: none"> To provide enough good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs. To enhance design quality to create natural beautiful places for people that maintain and enhance community and settlement identity.
Health and wellbeing	<ul style="list-style-type: none"> To improve the health and wellbeing of residents within Vale of Glamorgan promoting healthy and sustainable places.
Equality, diversity and inclusion	<ul style="list-style-type: none"> To reduce poverty and inequality; tackle social exclusion and promote community cohesion.
Climate change	<ul style="list-style-type: none"> Support the resilience of Vale of Glamorgan to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources. Reduce Vale of Glamorgan’s contribution to climate change from activities which result in greenhouse gas emissions and contribute to meeting the Council’s target of net zero.
Transport and movement	<ul style="list-style-type: none"> Increase sustainable transport use and reduce the need to travel
Natural resources	<ul style="list-style-type: none"> To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution. To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land. To protect mineral resources and ensure that an adequate supply of a diverse range of minerals is available over the long-term. Support waste management.

ISA topic	ISA objective
	<ul style="list-style-type: none"> To conserve, protect and enhance the water environment, water quality and water resources.
Biodiversity and geodiversity	<ul style="list-style-type: none"> Protect and enhance biodiversity within and surrounding Vale of Glamorgan.
Historic environment	<ul style="list-style-type: none"> Preserve and enhance Vale of Glamorgan’s heritage resource, including its historic environment and archaeological assets. Promote understanding of Vale of Glamorgan’s cultural heritage.
Landscape	<ul style="list-style-type: none"> To protect and enhance the quality and character of Vale of Glamorgan’s landscape, seascape and townscape.

What has Plan Preparation/ ISA involved up to this point?

1.7 Formal preparation of the RLDP has been underway since June 2021, with a wide range of evidence produced to inform its development. Table 1.2 sets out the key RLDP and ISA Documents published along with dates for consultation. The RLDP documents and the evidence base (including the ISA Reports) can be viewed and downloaded on the Council’s website.

Table 4.1 RLDP and ISA stages

RLDP Documents and Consultation	ISA Documents and Consultation
Adopted Local Development Plan Review Report (November 2021)	
	ISA Scoping Report (December 2022)
Pre-Deposit Plan (Preferred Strategy) (November 2023)	Initial ISA Report November 2023)

2. Establishing the reasonable alternatives

Introduction

2.1 The Council explored how much growth (housing and employment) is required over the plan period (2021 to 2036) and where this growth could be located within the Vale. Each of these issues are discussed in turn below.

Level of growth

2.2 VOGC commissioned Edge Analytics to prepare a range of demographic, housing, and employment growth scenarios to inform the RLDP (2023). A total of twelve growth options were derived from a variety of sources, including Welsh Government population projections (four options), POPGROUP (PG) trend-based scenarios (three options), dwelling-led scenarios (two options), and employment-led scenarios (three options). Using these sources, population and household growth trajectories are presented for the Vale of Glamorgan, alongside annual net migration, housing, and employment needs (see Table 2.1 overleaf).

Table 2.1 Scenario outcomes, 2021-2036

Scenario	Change 2021-2036				Average per year		
	Population change	Population change %	Households change	Households change %	Net migration	Dwellings	Employment
Dwelling-led 5Y	19,048	13.9	10,062	16.9	1,360	698	493
PG-5Y	16,923	12.4	9,187	15.4	1,222	637	426
Employment-led ELR	13,224	9.8	7,599	12.9	1,020	527	341
WG-2018-HIGHPOP	13,127	9.7	7,500	12.7	938	520	292
Dwelling-led 10Y	13,154	9.7	7,587	12.8	1,009	526	325
Employment-led ELR (CR 1-1)	10,719	7.9	6,548	11.1	869	454	341
WG-2018	9,787	7.3	6,214	10.6	851	431	243
PG-Long Term	8,561	6.3	5,705	9.6	739	396	210
PG-10Y	8,519	6.3	5,695	9.6	741	395	197
WG-2018-LOWPOP	5,172	3.8	4,559	7.8	759	316	191
Employment-led OE	2,402	1.8	3,041	5.2	367	211	25
WG-2014	13	0.0	2,182	3.9	64	151	-126

2.3 As shown in Table 2.1 above, the annual housing need ranges from 151 dwelling per annum, under the Welsh Government 2014-based principal population projection, to 698 dwellings per annum, under the dwelling-led 5-year scenario. The closest scenario to a mid-point between the low and high growth scenarios is the Welsh Government 2018-based principal population projection, which delivers 431 dwellings per annum. Most options fall within a hundred more/ less dwellings than this mid-point.

2.4 The scenarios have been grouped into three options for low, medium, and high growth as follows:

- **Low growth:** 151 to 211 dwellings per annum, and a reduction of 125 jobs to an increase of 25 jobs per annum (WG-2014 and Employment-led OE scenarios).
- **Medium growth:** 316 to 527 dwellings per annum and 191 to 341 new jobs per annum (WG-2018-LOWPOP, PG-10Y, PG-Long Term, WG-2018, Employment-led ELR (CR 1-1), Dwelling-led 10Y, WG-2018-HIGHPOP, and Employment-led ELR scenarios).
- **High growth:** 637 to 698 dwellings per annum and 426 to 493 new jobs per annum, (PG-5Y and Dwelling-led 5Y scenarios).

Location of growth

- 2.5 Having identified growth options, the next step was to consider how the level of growth could be appropriately distributed throughout the Vale.
- 2.6 A total of four alternative strategy options have been considered as part of the process, reflecting the issues facing the Vale of Glamorgan and the national and regional policy framework:
- Option 1 – Continuation of the adopted LDP Growth Strategy.
 - Option 2 – Dispersed Growth.
 - Option 3 – Focused Growth.
 - Option 4 – Sustainable Transport Oriented Growth.
- 2.7 The four options are set out overleaf, with further detail provided with the Spatial Options Background Paper. The Background Paper considers the advantages and disadvantages of each spatial option including the compliance of each spatial option with Future Wales. Key issues recognised as an integral part of any spatial strategy for the Vale include:
- Utilising previously developed land before greenfield sites in the first instance.
 - Addressing climate change through mitigation and adaptation.
 - Promoting placemaking principles.
 - Promoting sustainable transport and modal shift.
 - Maximising opportunities for green infrastructure enhancement.
 - Responding to the nature emergency through biodiversity net benefit.
- 2.8 The four alternative spatial options are all considered to be realistic but would result in different distributions of growth for housing and other forms of development (see figures overleaf).
- 2.9 Option 1 (Continuation of the adopted LDP Growth Strategy) presents an opportunity for all towns and villages to grow, with growth distributed proportionally according to the number of residential properties. Under Option 1, 90% of growth would be directed to the ten largest settlements, with greatest of growth being directed to Barry (41.85%) and Penarth (18.25%).
- 2.10 For Option 2 (Dispersed Growth), as above, the largest settlements in the Vale would deliver most of the growth. A smaller proportion of growth would then go to the larger villages with sustainability credentials. There would only be very limited growth in smaller villages and rural areas.
- 2.11 Under Option 3 (Focused Growth), growth would also be directed to the larger towns and villages but would also provide opportunity to distribute growth to other rural villages offering opportunities for sustainable growth. Option 3 categorises towns and villages according to an assessment of existing services and facilities, including public transport accessibility and proximity to employment areas and key services such as retail centres, schools, and health care. Growth is then assigned to each settlement to reflect its position in the settlement hierarchy.

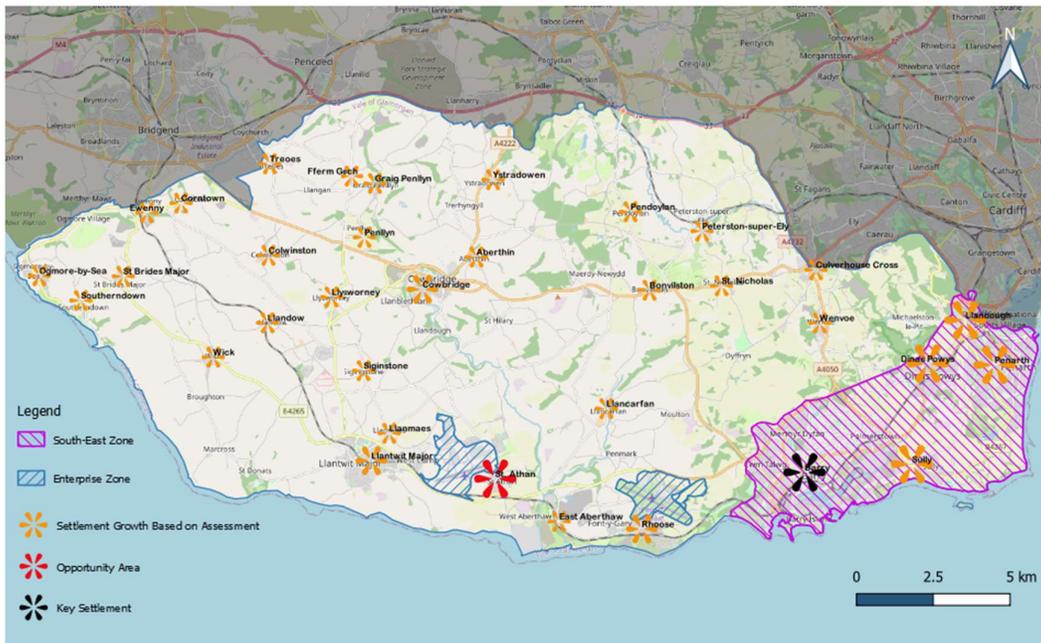
2.12 Option 4 (Sustainable Transport Orientated Growth) allocates development based on the role, function and character of settlements and existing constraints and opportunities. This place-based approach to growth would consider the character of the Vale's settlements which otherwise would be overlooked if based solely on the distribution of growth (based either on a settlements size or positioning in the settlement hierarchy). This would enable the plan to identify best growth opportunities for growth that will support or facility the enhancement of infrastructure, services, and facilities. As with Option 3, generally this would mean that the Vale's larger settlements would still = be the focus of development, but it would provide a degree of flexibility needed to achieve sustainable patterns of development.

2.13 It is noted that alongside the development and consideration of spatial strategy options, a call for candidate sites was undertaken by the Council¹. This was followed by Stage 1 and 2 Candidate Site Assessments (see Section 2.19 onwards, overleaf).

¹ Vale of Glamorgan Council (2022) Candidate Sites [online] available at:
https://www.valeofglamorgan.gov.uk/en/living/planning_and_building_control/Planning/planning_policy/RLDP/Candidate-Sites.aspx

Spatial Option 1 - Continuation of Adopted LDP Growth Strategy

Vale of Glamorgan Replacement Local Development Plan 2021 - 2036



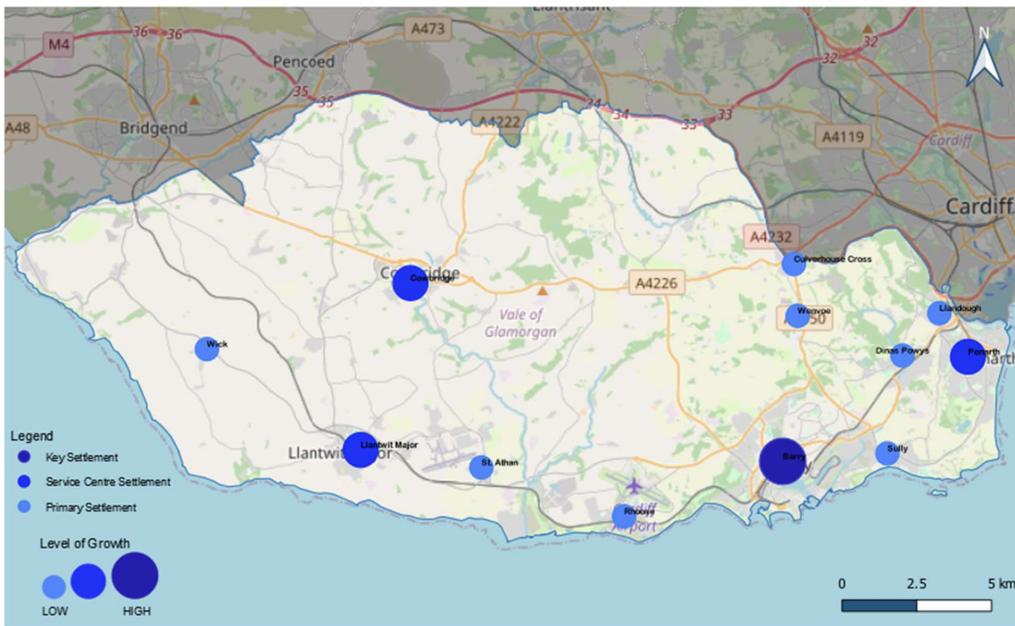
Spatial Option 2 - Dispersed Growth

Vale of Glamorgan Replacement Local Development Plan 2021 - 2036



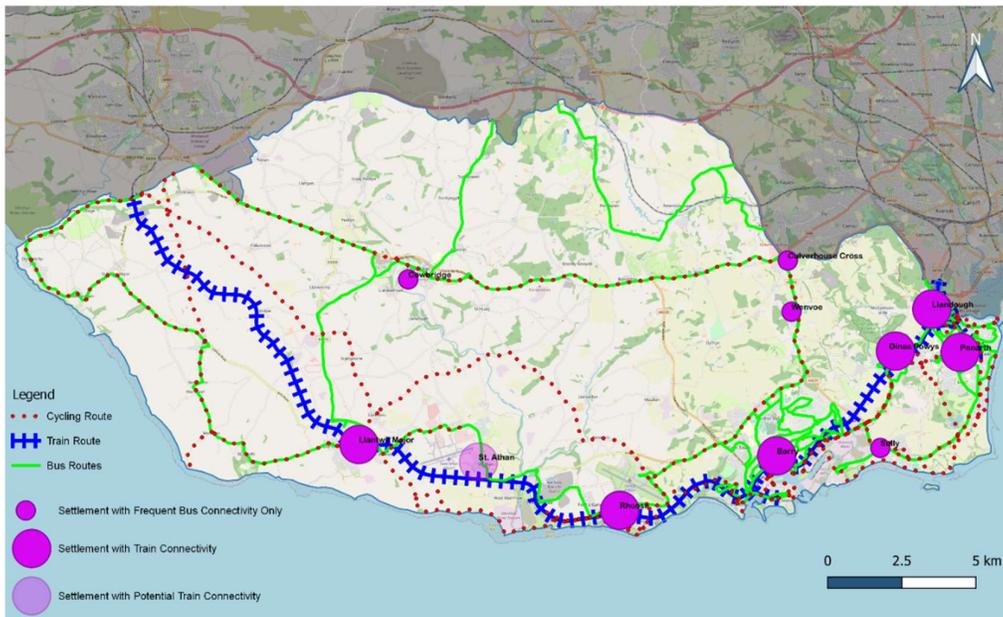
Spatial Option 3 - Focused Growth

Vale of Glamorgan Replacement Local Development Plan 2021 - 2036



Spatial Option 4 - Sustainable Transport Oriented Growth

Vale of Glamorgan Replacement Local Development Plan 2021 - 2036



Candidate Sites

2.14 A Candidate Site is a site submitted to the Council by an interested party (e.g. developer or landowner) for potential inclusion as an allocation in the RLDP. The Vale of Glamorgan Call for Candidate Sites consultation period ran from 24th June 2022 to 13th September 2022.

2.15 A total of 148 Candidate Sites were submitted for consideration. To identify the most appropriate and deliverable sites to submit the RLDP, the Council developed a Candidate Site Assessment which aimed to test the suitability of sites against a range of planning criteria including environmental, physical attributes and viability/deliverability evidence, consistent with the principles set out in Welsh Government Development Plans Manual (Edition 3) March 2020.

2.16 The Council's assessment methodology consists of a 4-stage process at which stage sites are filtered against set criteria (see Candidate Site Assessment Paper (2023)). The role of Stage 1 'Initial Site Filter' was to identify and dismiss any sites which the Council considered to be unsuitable. The criteria used to assess the suitability of the sites at this stage included whether the site satisfied the minimum site size threshold, the planning history of the site, whether the site was located with the open countryside, whether the site is affected by flooding contrary to national policy, potential impact on designated nature conservation areas, impact on archaeological or historic sites, located within a Health and Safety Zone, and whether the site was supported by development viability appraisals.

- 2.17 From the Stage 1 assessment, a total of 19 sites were excluded. These are identified within the published Candidate Sites Register².
- 2.18 Following the assessment of sites against Stage 1 of the candidate sites assessment criteria, 134 sites were deemed suitable for further consideration and have subsequently been assessed through the ISA. The methodology, individual site assessment findings, and summary findings are presented in Appendix B of the main ISA Report.

Key sites

- 2.19 Once a choice has been made in terms of broad direction of growth (Spatial Option 4 - Sustainable Transport Orientated Growth, see Chapter 7 for reasons for selection), the Council seek to identify 'key sites' to underpin the preferred strategy.
- 2.20 The Development Plans Manual does not prescribe a threshold for a 'key site,' instead identifying that this will vary by local authority and will therefore be a matter for LAs to determine. For a site to be 'key' in the context of the Vale, it is considered that it needs to be of a sufficient scale to make a significant contribution to the Objectives of the plan, most notably:
- Homes for All – larger key sites will maximise the delivery of affordable housing.
 - Placemaking – larger key sites can help to support a mix of uses, offer sustainable services and facilities, and deliver adequate infrastructure.
 - Protecting and Enhancing the Natural Environment – larger key sites offer greater opportunities to deliver biodiversity net benefit and fully incorporate networks of green infrastructure within developments.
 - Promoting active and sustainable travel choices – larger key sites can make more meaningful contributions to the enhancement of active travel networks.
- 2.21 The Council consider through their Candidate Site Selection Paper (2023), that to best address the objectives above, key sites would need to be a minimum of 200 dwellings.
- 2.22 Notwithstanding this, in addition to key sites, it is noted that there may still be a need for additional allocations at a smaller scale below this threshold, including affordable housing led developments. These will be identified at Deposit stage.
- 2.23 Overall, 19 sites with a capacity of 200 dwellings or more were submitted through the candidate site process. Several of these sites were ruled out at Stage 1 of the assessment process in accordance with the site assessment procedures. Further sites were discounted as part of Stage 2 due to constraints or other factors.³
- 2.24 Following an assessment against the Strategy, the following sites (Table 2.2 overleaf) have been identified as being suitable in principle for development. These sites accord with the strategy objectives and are subsequently included

² Vale of Glamorgan Council (2023) Stage 1 Candidate Site Register [online] available at: <https://valeofglamorgan.oc2.uk/document/24/707#topofdoc>

³ Stage 2 of the candidate site assessment consist of a 2-part assessment process (see the Candidate Site Assessment Paper). As part of Stage 2 AECOM carried out an assessment of sites against the ISA framework, see Appendix B of this Report.

within the Preferred Strategy as key site allocations. It is noted that of these, two are allocated in the adopted LDP and are considered suitable to be ‘rolled forward’ as an RLDP housing allocation.

Table 2.2 key site allocations

Site name	Settlement	Site category
Land North East Barry	Barry	New site
Readers Way	Rhoose	New site
Land north of the Railway Line	Rhoose	Rolled forward LDP site (planning application awaiting determination)
Land West of St Athan	St Athan	New site
Land to the south of Millands Farm	Llantwit Major	New site
Church Farm/ Land adjacent to Church Farm	St Athan	New site
Land north of Dinas Powys	Dinas Powys	New site
Upper Cosmeston Farm	Penarth	Rolled forward LDP site (planning application awaiting determination)

2.25 With the Preferred Strategy underpinned by the candidate site assessment work outlined above (further detail within the Council’s Candidate Site Assessment Paper), it is appropriate to conclude that there are no further strategic choices to be made.

3. Appraising the reasonable alternatives

3.1 The strategic options identified in Chapter 2 above were subject to a comparative appraisal under each ISA topic. Summary findings are presented below, with detailed findings are presented in Appendix C of the main ISA Report.

Level of growth

3.2 Summary appraisal findings in relation to the four options are presented below.

Table 3.1 Level growth – ISA summary findings

ISA theme	Rank/ Significant effects	Option 1: Low growth 151 – 211 dpa	Option 2: Medium growth 316 – 527 dpa	Option 3: High growth 637 – 698 dpa
Economy and employment	Rank	3	2	1
	Significant effects?	Uncertain	Yes – Positive	Yes – Positive
Population and community	Rank	3	2	1
	Significant effects?	No	Yes – Positive	Yes – Positive
Health and wellbeing	Rank	No	Yes – Positive	Yes – Positive
	Significant effects?	3	2	1
Equality, diversity, and social inclusion	Rank	3	2	1
	Significant effects?	No	Yes – Positive	Yes – Positive
Climate change (mitigation and adaptation)	Rank	1	2	3
	Significant effects?	Yes – Positive	Uncertain	Uncertain
Transport and movement	Rank	1	2	3
	Significant effects?	Yes – Positive	Uncertain	Uncertain
Natural resources (air, soil, minerals, and water)	Rank	1	2	3
	Significant effects?	No	Uncertain	Yes – Negative
Biodiversity and geodiversity	Rank	1	2	3
	Significant effects?	Uncertain	Uncertain	Uncertain
Historic environment	Rank	2	1	3
	Significant effects?	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	3

ISA theme	Rank/ Significant effects	Option 1: Low growth 151 – 211 dpa	Option 2: Medium growth 316 – 527 dpa	Option 3: High growth 637 – 698 dpa
	Significant effects?	No	Uncertain	Yes – Negative

3.3 The following conclusions are drawn for each ISA theme:

Economy and employment

The high growth option is ranked first, followed by the medium growth option and then the low growth option. The first two options are considered likely to lead to significant long-term positive effects as they will both likely deliver enough new jobs per year to support the growing population. Meanwhile, uncertainty is noted under the low growth option as growth is unlikely to be distributed evenly across the Vale, and one of the scenarios under this option (WG-2014) could even lead to a shrinking local economy. However, it is recognised that housing growth may stimulate the economy through an increase in the population, as well as the short-term employment opportunities associated with construction. Still, this is unlikely to be significant given the low housing growth projections for the scenarios under this option.

Population and community

It is considered that as the level of growth increases, so does the likelihood for significant positive effects in relation to this ISA topic. Therefore, the options are ranked according to the level of growth they deliver, with the high growth option ranked first, followed by the medium growth option and then the low growth option. The first two options are considered likely to lead to **significant long-term positive effect** as they support high/ moderate population growth. No significant effects are anticipated for the low growth option as the level of growth delivered through this option is unlikely to deliver a good range of house types and tenures across the entire local authority area and could lead to affordability issues.

Health and wellbeing

The high and medium growth options are considered likely to lead to **significant long-term positive effects** as they deliver a high/ moderate level of housing and employment growth, which will positively impact the health and wellbeing of new and existing residents through the benefits associated with growth. However, it is considered that the high growth option has the greatest potential to deliver such benefits, and therefore this option is ranked first. No significant effects are anticipated for the low growth option, as whilst the scenarios under this option deliver some housing growth, they deliver little (25 new jobs per year under the employment-led OE scenario) to no (-126 jobs per year under the WG-2014 scenario) employment growth.

Equality, diversity, and social inclusion

The high and medium growth options are considered likely to **significant long-term positive effects** as they deliver the highest/ second highest level of growth and therefore have the greatest potential to lead to investment into opportunities across the Vale, whilst delivering a variety of housing types and tenures and increasing services across the local authority area. No significant effects are anticipated for the low growth option due to the mismatch between housing and employment growth under the scenarios in this option. In terms of ranking, the options are ranked according to the level of growth they deliver.

Climate change (mitigation and adaptation)

Ultimately, the nature and significance of the effects will be dependent on where development is located, as well as the infrastructure improvements that will accompany development. However, when considering the level of housing and employment

growth alone, the low growth option is considered likely to lead to **significant long-term positive effects** because it provides the greatest opportunity to prioritise sites in sustainable locations with existing sustainable transport connections. **Uncertainty** is noted for the remaining two options as some development may need to be located in less sustainable locations, which would rely on the delivery of new infrastructure, and the potential of these options to deliver this is not clear at this stage. The options are ranked from lowest to highest level of growth.

Transport and movement

Ultimately, the nature and significance of effects will be dependent on where development is located, as well as the infrastructure improvements that will accompany development. However, when considering the level of housing and employment growth alone, the low growth option is likely to lead to **significant long-term positive effects** because it provides the greatest opportunity to prioritise sites in sustainable locations with existing sustainable transport connections. **Uncertainty** is noted for the high and medium growth options because some development may need to be located in less sustainable locations, which would rely on the delivery of new infrastructure, and the potential of these options to deliver this is not clear at this stage. The options are ranked from lowest to highest level of growth.

Natural resources (air, soil, minerals, and water)

The low growth option is ranked first and considered most likely to avoid significant impacts arising. The medium growth option is ranked second, with **uncertainty** noted, whilst the high growth option is ranked last and considered most likely to lead to **significant long-term negative effects** due to the amount of land that will likely be required to deliver the level of growth required of this option.

Biodiversity and geodiversity

The low growth option is ranked first, followed by the medium and then high growth option. **Uncertainty** is noted across all three options as the location of growth is unknown at this stage, which will determine the impact of development on designated sites.

Historic environment

Uncertainty is noted under all three options as the precise location of development under each option is not known at this stage. In terms of rankings, the medium growth option is ranked highest as it delivers a moderate level of growth, limiting the potential of development to negatively impact heritage assets when compared to the high growth option. At the same time, it offers greater potential to boost the tourism and heritage sector when compared to the low growth option. The low growth option is ranked second, above the high growth option, as it is less likely to negatively impact the setting of heritage assets due to increased flexibility in choosing sites.

Landscape

The low growth option is ranked highest under this ISA topic as it is most likely to preserve existing landscape/ townscape/ villagescape character across the Vale. No significant effects are predicted under the low growth option. The remaining two options are ranked according to increasing growth quantum, with the high growth option ranked last. Whilst **uncertainty** is noted under the medium growth option, **significant long-term negative effects** are predicted under the high growth option as this option is most likely to negatively impact landscape/ townscape/ villagescape character across the Vale.

Location of growth

3.4 Summary appraisal findings in relation to the four options are presented below.

Table 3.2 Location of growth - ISA summary findings

ISA theme	Rank/ Significant effects	Option 1: Continue the adopted LDP strategy	Option 2: Dispersed growth	Option 3: Focused growth	Option 4: Sustainable transport-oriented growth
Economy and employment	Rank	2	3	4	1
	Significant effects?	No	No	No	No
Population and community	Rank	2	3	3	1
	Significant effects?	Yes - positive	Yes - positive	Yes - positive	Yes - positive
Health and wellbeing	Rank	2	2	3	1
	Significant effects?	No	No	No	No
Equality, diversity, and social inclusion	Rank	1	1	2	1
	Significant effects?	No	No	No	No
Climate change (mitigation and adaptation)	Rank	2	3	2	1
	Significant effects?	No	No	No	Yes - positive
Transport and movement	Rank	2	4	3	1
	Significant effects?	Uncertain	Uncertain	Uncertain	Yes - positive
Natural resources (air, soil, minerals, and water)	Rank	1	3	2	1
	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
Biodiversity and geodiversity	Rank	1	2	1	1
	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain
Historic environment	Rank	1	3	2	2
	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	2	2
	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative

Overall, Option 4 performs notably well against most of the ISA objectives, reflecting the sustainability merits of connected development. The following conclusions are drawn in relation to each theme.

ISA theme	Conclusions
Economy and employment	<p>No significant effects are considered likely under any of the options, but Option 3 is notably less preferred overall due to the limitations placed on developing the rural economy (alongside rural housing growth), and a narrowed focus on the largest settlements, which may be at an opportunity cost of successfully integrating employment development alongside housing growth. Option 4 is preferred overall due to the focus on connected development (including economic connections and potential new rail connections at St Athan, which although not exclusive to this option, are more likely to be delivered under it), alongside appropriate consideration of rural development. Option 1 is considered likely to deliver similar benefits and is preferred to Option 2 as it considers appropriate rural development as opposed to assigning growth to every settlement despite their potential lack of economic and transport connections.</p>
Population and community	<p>Distributing the housing supply under all options is likely to support significant positive effects in the long-term. Option 4 performs notably better than the other options by means of its potential to deliver accessibility benefits, including a new rail station at St Athan (which although not exclusive to this option, are more likely to be delivered under it), ensuring all new homes are well connected. Option 1 also provides the benefits of a considered and more equitable housing distribution across the borough and is thus ranked next. Options 2 and 3 are ranked least favourably given the constraints identified under each option (potential effects on settlement identities under Option 2 and restricting rural development under Option 3).</p>
Health and wellbeing	<p>Whilst no significant effects are considered likely, it is recognised that Option 4 would support more residents across the borough with sustainable transport options including active travel options and green infrastructure networks. Options 1 and 2 are also considered to perform marginally better than Option 3 given these options provide greater potential for rural development benefits.</p>
Equality, diversity, and social inclusion	<p>No significant effects are considered likely at this stage, and positive effects are likely to be realised when the supporting policy framework emerges. Whilst few differences are drawn between the options, Options 1, 2, and 4 are considered to rank better than Option 3, given that they support an element of rural inclusivity.</p>
Climate change (mitigation and adaptation)	<p>Given the potential to deliver significant positive effects in relation to climate mitigation (i.e., focusing development in locations well served by sustainable transport), Option 4 is preferred overall.</p> <p>In relation to climate change adaptation, it is recognised that all options will be directed by the need for sequential and exception testing, which should ultimately ensure that vulnerable development within the floodplain is avoided, and no significant effects are considered likely in this respect. It is also recognised that the supporting policy framework for any of the options could ensure that suitable drainage strategies are included in development proposals, which minimise all forms of flood risk and seek betterment in terms of flood risk and/ or water quality.</p>
Transport and movement	<p>Option 4 ultimately stands out by focusing growth along sustainable transport corridors, including smaller settlements that are well connected by active travel and bus services. This option is ranked most favourably overall given its alignment with sustainable transport and movement objectives and the potential delivery of a new rail station at St Athan. No significant effects are considered likely under the remaining options and Option 2 is ranked least favourably given it directs development to less connected areas. Option 1 is considered to perform better than Option 3 as the approach considers settlement constraints and opportunities more widely across the Vale, which may help unlock more minor positive effects at smaller settlements.</p>

ISA theme	Conclusions
Natural resources (air, soil, minerals, and water)	<p>Whilst no significant negative effects are anticipated in relation to air, mineral resources, or water resources, there is an identified potential for negative effects of significance in relation to soil resources for all options. Limiting rural development under Options 1, 3, and 4 make these options perform marginally better than Option 2, and Options 1 and 4 provide notable benefits by means of connected development providing alternatives to the private car making them rank better overall.</p>
Biodiversity and geodiversity	<p>Whilst the potential for negative effects of significance is recognised under all options, there is uncertainty in the absence of precise locations and growth levels at individual settlements. Options 1, 3, and 4 are marginally preferred to Option 2 as they provide greater potential for strategic benefits (associated with economies of scale) and limit the extent of effects across the borough.</p>
Historic environment	<p>With a wealth of heritage assets and heritage settings abundant across the borough, all growth strategies (i.e., all options) are recognised for potential negative effects of significance, which will be better informed by consideration of precise development locations (with overall uncertainty noted at this stage). Option 2 is notably most likely to lead to impacts across a greater extent of the borough, by allocating development within every settlement area proportionate to its size. Whilst Option 3 (and to a lesser extent Option 4) would limit the extent of development across the borough by focusing it in the main settlement areas (potentially positive), the increased scale of development in main settlements, because of its narrowed focus, could ultimately lead to greater impacts in relation to the significance of designated heritage assets and their settings in these settlements. Option 1 is considered to perform marginally better in this respect, by way of wider distribution and consideration of each settlement's capacity for growth.</p>
Landscape	<p>With a focus on settlement expansion (with limited brownfield opportunities) under all options, it is considered likely that future growth will place pressures upon sensitive landscapes and key characteristics, predominantly from increased urbanisation. The potential for significant negative effects is ultimately recognised at this stage under all options (pre-mitigation), though this will be better informed by consideration of precise development locations. Option 2 is notably most likely to lead to impacts across a greater extent of the borough, by allocating development within every settlement area proportionate to its size. Whilst Option 3 (and to a lesser extent Option 4) would limit the extent of development across the borough by focusing it in the main settlement areas (potentially positive), the increased scale of development in main settlements, because of its narrowed focus, could ultimately lead to greater impacts in relation to landscape character and encroachment upon the countryside. Option 1 is considered to perform marginally better in this respect, by way of wider distribution with greater consideration of each settlement's capacity for growth, including landscape capacity for change.</p>

Developing the Preferred Strategy

3.5 Presented below is the Council's response to the alternatives appraisal and their reasons for selecting its preferred approach in light of the alternatives appraisal and other factors:

Level of growth

- 3.6 As explained within the Growth Options Background Paper, a medium level of growth received support through stakeholder engagement and is considered appropriate for the following reasons:
- 3.7 The number of jobs associated with the population increase would align with the recommendations of the ELS on the number of jobs that would be required, reducing the need for commuting.
- 3.8 In all options, there would be an increase in the 65+ population, but this level of growth would also stabilise the working age and school age populations over the plan period, unlike the low population growth option, where there would be a decline overall in these age groups. A stable working age and school aged population will support economic growth and will help achieve balanced thriving communities where services and community facilities such as schools remain viable.
- 3.9 This level of growth would require a moderate level of new dwellings to be allocated, which will increase opportunities to secure affordable housing through Section 106 agreements and deliver additional affordable housing led allocations. This will help address the significant affordable housing need identified across the Vale. Under the low growth options, there would be no need to allocate any additional new housing sites as there is sufficient land within the existing land supply to meet the housing requirements. Opportunities to deliver affordable housing would therefore be limited.
- 3.10 A medium level of growth would accord with the aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. The level of growth in the plan should be sufficiently ambitious to support this, whilst at the same time being complementary to and not competing with Cardiff, which is identified in Future Wales as the primary settlement within the region. It is considered that low growth, which would mean no new housing or employment allocations, would not accord with what the national growth area is seeking to achieve. Conversely, a level of growth beyond what has realistically been achieved in the past as required in the high growth scenarios could have implications for the level of growth that could be accommodated in other LAs within the Cardiff Capital Region.
- 3.11 It is considered that there is sufficient capacity within the Vale to accommodate a medium level of growth that can be delivered in sustainable locations in a manner that affords appropriate protection to the most valuable areas of the natural and built environment.
- 3.12 In order to respond to the RLDP Objectives, particularly delivering 'Homes for All' and 'Building a Prosperous and Green Economy,' it is considered that the evidence base would support growth towards the higher end of the 'medium' range as this would maximise the potential for affordable housing delivery and best align the proposed working age population increases with employment requirements.
- 3.13 The Preferred Growth option is the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan (526 dwellings per annum or 7,890 over the plan period). As this option

reflects what has been delivered in recent years, it is considered to be realistic and deliverable and suitably ambitious, given the Vale's position within the national growth area.

Location of growth

- 3.14 Following analysis of the four strategy options, and the output of the stakeholder engagement sessions, it is considered that the Sustainable Transport Oriented Growth Option is the most appropriate as it best aligns with the policy requirements of Future Wales, Planning Policy Wales and Llwybr Newydd – the Wales Transport Strategy by focusing development in sustainable places that would reduce the need to travel and encourage the use of sustainable transport. This option will consider the capacity of settlements to accommodate development, rather than targeting development primarily to sites of a certain size or position in the settlement hierarchy.
- 3.15 Following the engagement process, the focus of the strategy has been refined so that it seeks not only to locate sites in places well served by public transport but also targets development in places that reduce the need to travel in the first place through the co-location of housing in places with employment opportunities, services and community facilities. This Sustainable Growth Strategy also responds to the acute need for affordable housing through focusing development in the areas with greater need. The strategy also allows for small scale affordable housing led developments in minor rural settlements where appropriate to respond to the need for affordable housing in communities across the Vale.

4. Appraisal of the Preferred Strategy

Introduction

- 4.1 The appraisal identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the ISA objectives identified through scoping (see Table 1.1) as a methodological framework.
- 4.2 Broad summary findings are set out below, followed Table 4.1 which sets out headline conclusions against each ISA theme. Detailed findings are presented in the main ISA Report.

Summary appraisal findings

- 4.3 The Preferred Strategy is predicted to lead to **significant long-term positive effects** regarding the economy and employment, population and communities, and health and wellbeing ISA topic. This reflects the delivery of new employment land and homes to meet and exceed identified local needs, while providing flexibility during the plan period. Furthermore, growth is focused broadly in the most sustainable locations, ensuring that residents have better access to active/ public transport and existing services and facilities; and that the Vale's main towns and service centres are thriving in the long-term.
- 4.4 **Minor positive effects** are anticipated for transport and movement. Effects of significance are not anticipated for this ISA topics as growth still has the potential to lead to increased congestion, as a result of an increased number of residents/ private cars.
- 4.5 **Minor positive effects** are also concluded for the equalities, diversity and social inclusion ISA topic, recognising that a thriving hierarchy of settlements across the plan area (reflecting the Sustainable Settlement Appraisal) will contribute positively towards tackling inequalities and deprivation across the county borough.
- 4.6 **Neutral effects** are anticipated in relation to climate change adaptation, while uncertainty is concluded in relation to mitigation. This reflects the limited detail provided in terms of viability, although it is recognised the potential for significant positive effects exists. This includes, for example, utilising strategic scale opportunities for delivering innovative renewable energy generation.
- 4.7 **Uncertainty** is concluded at this stage in relation to the historic environment and landscape, reflecting the limited information required in relation to smaller sites. The precise location and scale of development at these sites will influence the significance of residual effects, alongside wider policy provisions yet to be developed.
- 4.8 **Significant negative effects** are considered likely for the natural resources ISA topic given the level of growth proposed through the Preferred Strategy. Notably, this will result in the loss of a significant amount of greenfield land, although it is recognised uncertainty surrounds the smaller site allocations.
- 4.9 **Significant negative effects** in relation to biodiversity reflect the conclusions provided through the HRA. It is however recognised that once

recommendations have been adopted, residual effects are likely to be lessened; with the potential for positive effects.

Table 4.1 Summary headline conclusions

ISA topic	Headline conclusions
Economy and employment	The Preferred Strategy is predicted to lead to significant long-term positive effects regarding the economy and employment ISA topic. It takes advantage of opportunities arising from the Vale’s strategic location, capitalising upon major employment allocations in sustainable locations, as key areas of investment. As a result, it should help to provide significant employment and training opportunities, enable established business to expand, and provide attractive areas for local business investment. It is considered that economic growth could potentially reduce out-commuting, however the strategy still seeks to enhance those key sustainable connections with strategic employment areas outside of the Vale, such as Cardiff.
Population and communities	The strategy performs well overall against the population and communities ISA objectives, with significant long-term positive effects concluded. The strategy seeks to deliver a sustainable level of housing and employment growth, supported by appropriate infrastructure to accord with the Vale’s position within the Cardiff Capital Region/ Future Wales national growth area. It is considered that focusing growth, including key strategic sites, within the Strategic Growth Area will support the development of adaptable, accessible, well-connected communities. Specifically, the scale of development proposed through Key Site ‘North East Barry’ offers the opportunity to make significant infrastructure improvements to ensure that this extension to Barry integrates with the existing community.
Health and wellbeing	The Preferred Strategy document recognises that the health and well-being of communities is crucially important to delivering long term sustainable development and placemaking. The Strategy focuses growth in the most sustainable locations within the Strategic Growth Area, contributing positively to the health and wellbeing ISA topic. This includes ensuring that residents have better access to active/ public transport and existing services and facilities, which are largely located in the Key Settlement of Barry and supporting Service Centre Settlements. The Preferred Strategy also performs positively in terms of setting requirements for provision of green infrastructure, and protecting and enhancing connectivity between green infrastructure assets. Significant long term positive effects are therefore concluded at this stage.
Equalities, diversity and social inclusion	The Preferred Strategy performs well in terms of directing growth to those areas of the Vale of Glamorgan identified as more deprived by the Welsh IMD, and addressing inequalities in these communities. This will help tackle inequalities and deprivation within the Vale by ensuring residents have access to employment, education, and services nearby. The Preferred Strategy also seeks to address issues relating to equalities, diversity, and social inclusion by delivering affordable housing. Consideration is also given through the strategy to seeks to ensure that future housing makes provision for the specific accommodation needs of Gypsy & Travellers, elderly, and disabled people. Finally, the deposit plan should seek to address the conditions which are essential to the Welsh language, and which contribute to its use. Minor positive effects are therefore concluded overall at this stage.
Climate change	Where Key Sites are constrained by a level of flood risk (less than 50% of the site within Flood Zone 2), it is considered that higher level policy, alongside forthcoming masterplanning, and site specific policy

requirements, should suitably mitigate any adverse effects. This includes ensuring that a sequential approach is taken to ensure that development does not take place in areas at high risk of flooding when appropriate areas of lower risk are reasonably available. However airing on the side of caution, **uncertainty** is concluded at this stage in relation to climate change adaptation.

Regarding climate change mitigation, the distribution of growth to the Principal and Local Centres could theoretically maximise the potential to seek strategic scale opportunities for delivering innovative renewable energy generation. Another key aspect of the Preferred Strategy is support given to regeneration opportunities, including safeguarding land at the former Aberthaw Power Station as a green energy hub.

Uncertainty is nonetheless concluded for climate change mitigation at this stage. A key question being how the Preferred Strategy seeks to capitalise upon Cardiff Airport, and the challenges this creates for meeting decarbonisation targets/ commitments. It is considered that this will be explored further within the deposit plan.

Transport and movement

The Preferred Strategy gives great weight to the sustainable transport network and the importance of directing growth to locations which can either integrate with the existing network or enhance it by strengthening links with key services and facilities. Development is focused to the Strategic Growth Area, which includes the settlements of Penarth and Cogan, Dinas Powys, Barry, Rhoose and Llantwit Major; all locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links. The Preferred Strategy also performs well through allocating key strategic sites that are broadly within walking and cycling distance of centres, as this will reduce the need to travel. Additionally, given the scale of key sites, positive effects are likely to be delivered through infrastructure provision, improved connectivity, and increased levels of self-containment. **Minor positive effects** are therefore concluded overall.

Natural resources

Whilst there is a need to conserve natural resources, it is recognised that the extent of growth proposed through the Preferred Strategy will result in at least a degree of loss of these resources. A key issue of concern is the loss of greenfield, agricultural land; however, this is largely unavoidable given the limited availability of brownfield land in the Vale. Nevertheless, **significant negative effects** are considered likely given the level of growth proposed through the Preferred Strategy, particularly Key Sites on the settlement edges. However, given only key sites have been allocated at this stage, a level of uncertainty is noted.

Biodiversity and geodiversity

Significant negative effects are concluded reflecting the conclusions of the HRA; identifying that for some combinations of European site and impact pathway it was not possible for the HRA to conclude that there would be no likely significant effect, or adverse effect on integrity, either alone or in combination with other projects and plans. These combinations are set out in the HRA, and include recreational pressure at Severn Estuary SPA/SAC/Ramsar site, and water quality (treated sewage effluent and surface runoff) impacts on Kenfig SAC. However it is recognised by adopting recommendations set out through the HRA, the deposit plan could lead to neutral/ positive overall effects.

Historic environment

Without the location of all sites underpinning the Preferred Strategy, it is difficult to draw any definitive conclusions with regards to the nature and significance of effects that are likely to arise in relation to the historic environment ISA topic. However, it is recognised that there is an abundance of designated heritage assets within and surrounding Barry and the service centres, as well as the Key Sites, where most growth is being directed. Taking the precautionary principle, **significant negative effects** are predicted at this stage. It is recognised that the ISA will be

better informed by the next iteration of plan-making, where potential adverse effects will likely be mitigated through development management policy; and detailed design and masterplanning of key sites.

Landscape

Without the location of all sites underpinning the Preferred Strategy, it is difficult to draw any definitive conclusions with regards to the nature and significance of effects that are likely to arise in relation to the landscape topic. Nonetheless, it is recognised that the Key Sites included within the Preferred Strategy are predominately large greenfield sites on the edge of settlements, with the potential to change the landscape in a significant way. Taking the precautionary principle, **significant negative effects** are predicted at this stage. It is recognised that the ISA will be better informed by the next iteration of plan-making, where potential adverse effects will likely be mitigated through development management policy; and detailed design and masterplanning of key sites.

5. Next steps and monitoring

Next steps

- 5.1 The Initial ISA Report and NTS will accompany the Preferred Strategy for public consultation from 6th December 2023 to 31st January 2024. Any comments received will be reviewed and then considered as part of the iterative plan-making and ISA process.
- 5.2 The representations received along with further evidence base work, including further ISA work, will inform the development of the Deposit Plan which is scheduled to be published for consultation in early 2025. An updated ISA Report will accompany the Deposit Plan for consultation.

Monitoring

- 5.3 Monitoring measures will be established within the next version of the ISA Report to address the potential significant effects associated with the Deposit version of the plan.

