

Torfaen Local Development Plan (2006-2021)

Sustainability Appraisal Report (SAR) Addendum & Habitats Regulations Assessment (HRA) Screening

Assessment of Inspector's Changes

December 2013

1. Overview

- 1.1 This is the Sustainability Appraisal Report Addendum prepared to assess the Inspector's Binding Changes to the LDP as outlined in the 'Report on the Examination into the Torfaen LDP 2006-2021 (October 2013)'. For clarification purposes this addendum is an update to the previous iteration of the SA process of the LDP namely the 'Sustainability Appraisal Report Addendum – Assessment of recommended Matters Arising Changes and Matters Arising Changes' (July 2013).
- 1.2 The Inspector has made 7 binding changes to the LDP and he concludes that these alongside the previous recommended MAC's and MAC's *'are in line with the substance of the overall plan and its policies, and do not undermine the Sustainability Appraisal and participatory processes that have been undertaken'*.
- 1.3 This SA Report is an update to the previous SA Reports and has been prepared as part of the iterative assessment of the production of the LDP. The documents should be read as a suite of documents outlining the SA assessment of the LDP. The process of the SA of the LDP is outlined in the reports below prepared as part of the process:
 - Sustainability Appraisal Report of Deposit LDP (March 2011)
 - Sustainability Appraisal Report (incorporating Focused Changes (March 2012)
 - Sustainability Appraisal Report Addendum and Habitats Regulations Screening - Assessment of Further Focused Changes (December 2012)
 - Sustainability Appraisal Report Addendum & Habitats Regulations Assessment (HRA) Screening – Assessment of recommended Matters Arising Changes and Matters Arising Changes (July 2013)
- 1.4 Table 1.1 overleaf outlines the Inspector's changes and includes commentary from the Council on the implications of those changes on the Sustainability Appraisal of the LDP.
- 1.5 It is concluded that none of the changes proposed are considered to have significant impacts on sustainability issues and affect the overall SA of the LDP, in line with the findings of the Inspector.
- 1.6 The findings for the HRA Screening of the Inspector's Changes are outlined in Section 4. None of the changes would result in a significant effect on a European site and have no implications for the findings of the original HRA of the Deposit LDP.
- 1.7 The Sustainability Appraisal Report (incorporating Focussed Changes) (March 2012) as amended by the SA Addendum of Further Focused Changes (December 2012), SA Addendum of recommended Matters Arising Changes and Matters Arising Changes (July 2013) and the SA Addendum of Inspector's Changes (December 2013) comprise the Sustainability Appraisal Report of the final LDP.

TABLE 1.1 - Inspector's Changes and implications for SA Assessment

Ref No	LDP Policy / Para	Nature of Change	Sustainability Appraisal Commentary
IC01	SAA7 & relevant sections of Monitoring Framework	<p>Amend text of policy to read: 'Land is allocated at Llanfrechfa Grange Strategic Action Area, Cwmbran for the construction of a Specialist and Critical Care Centre Hospital, approximately 300 dwellings, 4.8 hectares of [healthcare related] employment land, community facilities, playing pitch provision, children's play areas and public open space aided by strategic highway infrastructure improvements. <u>The land uses may necessitate strategic highway infrastructure improvements and this requirement should be determined through a Traffic Impact Assessment'</u></p> <p><u>Amend relevant sections of the Monitoring Framework to take account of the above change.</u></p>	<p>This change is necessary to ensure that the justification for the link road will be determined through a traffic impact assessment. Importantly the allocation remains in the plan but delivery of this is less uncertain in the plan period. However in reality this change has just clarified the fact that the link road will only be provided if the TIA identifies that it is required on highway and safety grounds. Further discussion on this item is contained overleaf.</p> <p>Amendments to the Monitoring Framework do not have impact on the SA as they are factual updates reflecting changes that have been assessed through the SA of the change to the policy.</p> <p><u>No impact on the SA</u></p>
IC02	Para 7.8.3	<p>7.8.3 The vision for the Llanfrechfa Grange SAA is to deliver an integrated and planned high-quality sustainable scheme delivering regeneration benefits and an extension to the existing community of Llanfrechfa, which comprises <u>will ultimately comprise</u> of the following elements:</p> <ul style="list-style-type: none"> • Delivery of a regional SCCC facility of 450 to 500 beds in the northern part of the Action Area, providing specialist services for the 'Gwent' and South Powys Area; • Additional high quality employment facilities to the north of the SAA to compliment the SCCC; • Approximately 300 houses in the southern part of the SAA in order to tackle the identified housing need in the area; • Provision of a new link road to the SAA providing access 	<p>These updates are factual in nature and clarify more clearly policy aspirations. Inclusion of text clarifies that provision of facilities are linked to the requirements of the development and to further reference the fact the Link Rd will only be delivered if justified through a TIA. <u>This change is related to ICO1 which is discussed overleaf</u></p> <p><u>No impact on the SA</u></p>

		<p>and an alternative route to the existing B4236 Caerleon Road <u>if deemed to be required in support of the development proposed by a Traffic Impact Assessment</u>;</p> <ul style="list-style-type: none"> • Provision of <u>appropriate</u> strong pedestrian and cycle linkages to surrounding areas; • <u>Reasonable</u> Provision of community facilities; • Provision of open space and recreation facilities in accordance with the Fields in Trust's up-to-date benchmark standards or figures identified in the Development Framework and retention or relocation of existing recreation facilities; • Integration of the Llanfrechfa Grange manor house, a Grade II Listed Building, into the residential development scheme; and • Consideration of the remains associated with White Hall as part of any proposed development scheme. 	
IC03	Para 7.8.4	<p>The delivery of this SAA should come forward in a phased manner with the enabling works for the SCCC, including <u>any necessary</u> highway improvements, delivered first, followed by the SCCC itself and finally the housing. The nature, timing and order of the remaining uses will be determined by market conditions and further studies to inform for example the need for and timing of any necessary highway improvements.</p>	<p>This is a factual update to reflect the fact that the need for a Link Rd will have to be justified through a TIA in light of the change above. Factual update to reflect the phasing timescales for housing not agreed as yet.</p> <p><u>No impact on the SA</u></p>
IC04	Para 9.27.4	<p>Llanfrechfa Grange Link Road, Llanfrechfa: To facilitate development of Llanfrechfa Grange site a new link road will <u>may</u> be required through the site to link the B4236 near Selby Close with the B4236 at Edgehill. <u>The requirement is subject to a Traffic Impact Assessment which should assess specific development proposals for the hospital, housing and employment uses</u>. The link road will provide an effective alternative route to the existing substandard B4236.</p>	<p>This change is necessary to ensure that the justification for the link road will be determined through a traffic impact assessment. Importantly the allocation remains in the plan but delivery of this is less uncertain in the plan period. <u>This change is related to ICO1 which is discussed overleaf</u></p> <p>However in reality this change has just clarified the fact that the link road will only be provided if the TIA identifies that it is required on highway and safety</p>

			<p>grounds. Further discussion on this item is contained overleaf</p> <p><u>No impact on the SA</u></p>
IC05	LDP Appendix 1 – Former Police College and Adjacent Land, Cwmbran	<p>Replace text under heading ‘Housing Numbers’ with:</p> <p><u>Although the Draft Development Framework for this site (Dated August 2010) envisaged 456 dwellings on this site, it has subsequently emerged that significant areas of unimproved grassland on the site need to be excluded from development. A total of 350 dwellings can be accommodated. A revised Development Framework incorporating the measures needed to protect the identified grassland areas will be required.</u></p> <p>Delete text and table under heading ‘Phasing’ and replace with:</p> <p><u>Given the need to review the Development Framework it is not anticipated that dwelling completions will start until 2015/2016, with 50 dwellings being completed in the first year and the remainder over the period 2016/2017 to 2020/2021.</u></p>	<p>The impact of this change has been assessed as part of the SA Report (July 2013) of the Matters Arising Changes (MAC10.2/MAC10.1) with respect to this site. The Inspector’s change is to amend the corresponding Appendix of the Plan to reflect that change.</p> <p><u>No impact on the SA</u></p>
IC06	Policy S6, Para 5.6.2 & Policy Target 1 of the Monitoring Framework	Delete 42.4ha in line 2 of Policy S6, line 1 of paragraph 5.6.2 and Policy Target 1 of the Monitoring Framework and insert <u>40.3ha in their place</u>	<p>This amendment is to reflect the deletion of the British (SAA5). The impact of this change has been assessed as part of the SA Report (July 2013) of the Matters Arising Changes (MAC11.1a/MAC11.b) with respect to this site, which included the loss of employment provision. However in light of the Inspector’s amendments to the Employment figures further discussion on this is contained overleaf.</p> <p>Amendments to the Monitoring Framework do not impact on the SA as they are factual updates reflecting</p>

			<p>changes that have been assessed through the SA of the change to the policy.</p> <p><u>No impact on the SA</u></p>
IC07	EET3	<p>Revise text of Policy to read: During the Plan Period 2006-2021 the following land in the North Torfaen area is allocated for the provision of approximately 40ha <u>8.0ha</u> (which includes the British Strategic Action Area (at least 2.0ha)) of employment development as identified on the Proposals Map</p>	<p>This amendment is to reflect the deletion of the British (SAA5) employment allocation. The impact of this change has been assessed as part of the SA Report (July 2013) of the Matters Arising Changes (MAC11.1a/MAC11.b) with respect to this site, which included the loss of employment provision. However in light of the Inspector's amendments to the Employment figures further discussion on this is contained overleaf.</p> <p><u>No impact on the SA</u></p>

2. Methodology

- 2.1 Table 1.1 above outlines that none of the changes are thought to be of significance that will affect the findings of the SA. They have been reviewed against the relevant SA components as per previous assessments as outlined below:
- **Component 3: Employment and Economy**
 - **Component 14: Llanfrechfa Grange Strategic Action Area**
 - **Component 15: Strategic Transport Approach**
- 2.2 The review includes an assessment of whether or not in the Councils view the Changes would result in significant effects on the SA and whether they would contribute to sustainable development. This has been undertaken in consideration of the Inspector's findings that the changes *'are in line with the substance of the overall plan and its policies, and do not undermine the Sustainability Appraisal and participatory processes that have been undertaken'*.
- 2.3 The assessment has considered the Inspector's Changes against the relevant component tables of the SA Assessment as amended where relevant by previous iterations of the SA. Component 3 was amended by the Focused Changes 'Sustainability Appraisal Report incorporating Focussed Changes' (March 2012) with Components 14 and 15 remaining unchanged from the Sustainability Appraisal Report of the Deposit LDP (March 2011). The Changes do not result in amendments to the SA Assessments. An appraisal of the changes is outlined overleaf.

3. SA Screening of the Inspector's Changes

Component 3: Employment and Economy

Policy S6 Employment and Economy (IC06)

Policy EET3 Employment Allocation in North Torfaen (IC07)

- 3.1 A reduction in the overall employment allocations by 2.0ha is required to the policies in recognition of the now anticipated longer timescales involved in bringing forward the British Site. This means the previous 42.1ha identified for employment land needs to be amended in the plan to 40.1ha, but the allocation amended to 40.3ha to reflect minor calculation amendment to the employment table. The revised SA of the British site as part of the Matters Arising Changes noted that the original prediction of significant beneficial effects for Objective 1 local employment was revised to slightly positive as certainty of delivery for employment delivery at this site is reduced over the LDP period. The assessment noted the amendment reduces employment delivery over the short to medium term having negative effects. Employment opportunities will still emerge from the land reclamation scheme, but the delay to the delivery of the mixed use element reduces the significant positive effect.
- 3.2 The impact of this change will mean a 4.3% reduction in overall employment land delivery over the plan period and a reduction of 20% of the employment allocations for North Torfaen. Whilst this will reduce delivery of employment sites up to 2021, employment generation will still be provided through the Land Reclamation Scheme and employment delivery on this site will still come to fruition albeit over a longer term. Whilst reduced there is still a range and choice of employment sites in the North Torfaen area. Compared to the 12% of total housing allocations in this area, the employment land supply in North Torfaen, excluding regional allocations still remains at 19% of total employment allocations in Torfaen. This over supply allows for a variety and choice of employment opportunities in North Torfaen.
- 3.3 The changes to Policy S6 and EET3 since the previous iteration of the SA of Focussed Changes (March 2012) for the Economy and Employment component whilst reducing the impact of some of the identified significant effects does not alter the results. The original SA Assessment predicted significant positive effects against SA Objectives 1 (local employment), 2 (economic growth); 6 (geodiversity), 12 (efficient use of land and buildings), 13 (modal shift to sustainable transport) and 20 (access to local facilities). These identified significant positive effects do not change as a result of the Inspector's Changes.
- 3.4 In respect of Objective 1 there is still a significant supply of employment land to support local employment, albeit a reduction in the North Torfaen area as outlined above. In respect of Objective 2, the still significant supply of employment sites delivers significant positive effects in terms of promoting economic growth. This 4% reduction in employment land whilst marginally reducing the positive effects does not alter the SA findings. In respect of Objective 6 the loss of employment land at this site has a neutral effect as the British is still allocated for a land reclamation scheme which will remediate derelict land and will facilitate the longer term employment delivery. Existing identified significant positive effects against this

objective remain. In respect of Objective 12 a minor reduction in employment numbers does not alter the significant positive effects of the plan against this objective. Indeed the land reclamation scheme will deliver an efficient use of land through remediating and bringing back into use a derelict brownfield site, ready for the longer term employment delivery.

- 3.5 In respect of Objective 13 the minor reduction in employment sites does not alter the significant positive effects of the employment strategy of the plan to promote sustainable transport. The emphasis on a sustainable mixed use development on the British will come to fruition over the longer term, with employment provision as part of that given the long term regeneration of the site. The land reclamation element is not considered to offer significant negative effects during the plan period, although this will need to promote sustainable transport choices. The longer term regeneration will involve increase in trip rates and the future Development Framework will need to promote the principles of a sustainable movement hierarchy. In respect of Objective 20 the spatial approach to employment provision still delivers significant positive effects against this objective, but the lack of delivery of employment in the Talywain area during the plan period reduces the significance against this objective in the short term. The aim of the future redevelopment will continue to provide employment and local facilities.
- 3.6 Significant adverse effects were predicted against SA Objectives 8 (Noise and Pollution) and 10 (historic resources and setting). In respect of 8, the minor reduction in employment land will not affect the significant effects as significant employment development remains in the LDP. Non delivery of employment land will have minor positive benefits with a reduction in construction, illumination of buildings, transport etc. However the land reclamation scheme at the site will have implications for noise and light pollution, but noting that noise and light assessments and appropriate mitigation could potentially reduce the significance of these effects. Long term development will introduce new light sources and noise so the overall effect remains as negative. In respect of Objective 10 the reduction in employment provision at this site will not alter potential predicted identified effects, the majority attributed to large employment allocations in Blaenavon World Heritage Site that need to be designed sensitively. The reclamation at the British has potential for adverse effects against historic resources but also without the scheme any potential benefits through the treatment and potential reuse of the listed buildings will not come to fruition.
- 3.7 Whilst the site was planned to deliver 2.0ha of employment land in Talywain there is still an oversupply of employment land in the North Torfaen area to allow for variety and choice. This recognises that employment benefits aside from that associated with the land reclamation scheme will be delivered over the longer term, contributing to positive effects.
- 3.8 In light of the above the latest iteration of the SA assessment for Component 3 (March 2012) remains unaltered by this change.

Component 14: Llanfrechfa Grange Strategic Action Area

Policy SAA7 (IC01, IC03)

- 3.9 The change to this policy focuses on the reduction in the certainty of the delivery of Llanfrechfa Grange Link Road as part of this scheme. Whilst the allocation remains, it will only be delivered as part of this scheme, if the need is fully justified through a Transport Impact Assessment. Notwithstanding the above in any case, the creation of a new access road would have to be justified through a planning application. Therefore any effects identified remain although the certainty of them is reduced. The change to this policy has no effect against the majority of the SA Objectives which identified significant positive effects. However significant positive effects were identified against Objective 12 (efficient use of land and buildings) and Objective 23 (cultural identity of communities and improve social cohesion). In respect of Objective 12 potential non delivery of the Link road will reduce development of greenfield land so will enhance the positive effects against this objective, but does not alter the predicted significant positive effects of the scheme against this objective. In respect of Objective 23 non delivery of the link road will have minor negative effects against this objective due to the communities preference for a route to be in place. However this does not alter the identified significant positive effects that this development would bring through new services and facilities and open spaces and recreation facilities.
- 3.10 Significant negative effects were predicted against SA Objectives 7 (reduce air pollution and improve air quality), 8 (minimise noise and light pollution), 11 (enhance valued landscape) and 13 (achieve modal shift to sustainable transport). In respect of Objective 7 reduced certainty over delivery of the link road could reduce negative effects through non provision of additional highways provision. However the increased traffic would be focused along Caerleon Road which could worsen air quality in that location. On balance predicted effects identified from the new development remain unaltered by the reduction in certainty over the link road delivery. In respect of Objective 8 whilst reduced certainty of the delivery of the link road could lead to a reduction in the scale of negative effects through noise and light pollution from the new road and infrastructure in that locality, lack of a diversionary route would increase sources of noise and light pollution along Caerleon Road. On balance significant negative effects identified from the new development remain unaltered by the reduction in certainty over the link road delivery. In respect of Objective 11 significant negative effects were identified given the development would change landscape character. Less certainty over the provision of a link road would reduce further development into the landscape setting, as the road infrastructure would be through existing greenfield land. However the provision of online improvements would require significant removal of trees/hedgerows which would make the site more visually prominent. On balance potential negative effects identified from the new development remain unaltered by the reduction in certainty over the link road delivery. Finally in respect of Objective 13 less certainty over the delivery of the link road could have beneficial effects against this objective as non delivery of a link road will focus more emphasis on the provision of sustainable transport facilities and public transport accessibility to promote sustainable patterns of movement. It is noted however that promotion of sustainable transport is identified in the Development Framework for the site which mitigates negative effects identified. The reduction in certainty of the link road does

not alter the identified effects, which will be mitigated as part of full details to support modal shift and promotion of sustainable transport as part of a planning application. Importantly the site has an overall positive effect against the range of sustainability objectives.

- 3.11 In light of the above the original SA assessment for Component 14 (March 2011) remains unaltered by this change.

Component 15: Strategic Transport Approach

Policy T1 (IC04)

- 3.12 A change is proposed to Policy T1 which safeguards land for the construction of the Llanfrechfa Grange Link Road. The change in line with the revisions to SAA7 above reduces the certainty of the delivery of this infrastructure project. The change to this policy has no effect against the SA Objectives which identified significant positive effects. Significant positive benefits are predicted against this component through the provision of Torfaen wide infrastructure to facilitate access to employment and services and encourage tourism. The link road is a localised highway improvement to serve one particular site. No significant negative effects are identified against the SA objectives for this component. It is therefore concluded that the change to the policy has no effect on the predicted significant positive effects of the LDP against this component and effects are more relevant to Component 14 above in respect of the specific site which this localised highway improvement will potentially serve.
- 3.13 In light of the above the original SA assessment for Component 15 (March 2011) remains unaltered by this change.

4. HRA Screening of the Inspector's Changes

Habitats Regulations Assessment (Appropriate Assessment) (HRA) of the Deposit LDP (February 2011)

- 4.1 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 (N2K) sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) [which are classified under the Council Directive 79/409/EEC on the conservation of wild birds, the 'Birds Directive'].
- 4.2 The purpose of Habitats Regulations Assessment is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a European Site and to ascertain whether there is potential for significant effects on the integrity¹ of that site. Where the potential for significant negative effects are identified, avoidance, mitigation and where necessary alternative options should be examined to avoid any potential damaging effects. The scope of the HRA is dependent on the location, size and significance of the proposed plan or project and the sensitivities and nature of the interest features of the European sites under consideration.
- 4.3 Torfaen does not contain any European sites, but the assessment of the Deposit LDP considered the Usk Bat site SAC and the River Usk SAC located in neighbouring authorities. The Habitats Regulations Assessment took place as a separate parallel exercise to the SA/SEA.
- 4.4 Following initial assessment of the LDP Preferred Strategy in 2008, a further screening of European sites undertaken in April 2009 concluded that in relation to the Usk Bat sites SAC subject to the LDP including specific wording to ensure that site level HRA is applied to specific development proposals there would be no likely significant effects on the SAC resulting from the implementation of the Deposit LDP.
- 4.5 In respect of the River Usk SAC, an Appropriate Assessment of the LDP was undertaken as the HRA could not conclude with certainty that the level of development proposed in the Deposit LDP and surrounding areas would not have adverse in-combination effects on the integrity of the River Usk SAC through reduced water quality and increased water resource demand. Mitigation measures were incorporated into the Deposit LDP to ensure that water resources for new developments are supplied sustainably and that new development will not have adverse impacts on the water quality and quantity of the Afon Lwyd, hence which has the potential to have adverse in-combination effects on the integrity of the River Usk SAC.
- 4.6 The Council considered the conclusions arising from the HRA process and the advice provided by CCW (now Natural Resources Wales) and to ensure that the requirements of the Habitats Regulations are met, incorporated all the proposed recommendations detailed in the HRA report into the Deposit LDP. The AA

¹ Integrity is described as the sites' coherence, ecological structure and function across the whole area that enables it to sustain the habitat, complex of habitats and/or levels of populations of species for which it was classified, (ODPM, 2005).

therefore concluded that with the monitoring and mitigation measures in place, the implementation of the Deposit Plan will not result in adverse in combination effects on the integrity of the River Usk SAC.

Screening Assessment of Focused Changes (March 2012)

- 4.7 A Screening Assessment was undertaken of the Focused Changes proposed to the Deposit LDP in March 2012. This assessment can be found in the report 'Habitats Regulations Assessment Screening of Focused Changes' which can be found on the LDP Examination Library as submitted document SD13. In summary the screening assessment did not change the findings of the original HRA Report (February 2011). It was concluded that no Focused Changes would result in a likely significant effect on any of the European Sites identified either alone or in combination with other projects / plans considering the existing mitigation measures provided by the LDP in its policies for the protection/enhancement of the environment (including European designated Sites). Therefore, no further Appropriate Assessment was required.

Screening Assessment of Further Focused Changes (December 2012)

- 4.8 A Screening Assessment was undertaken of the Further Focused Changes proposed to the Deposit LDP in December 2012. This assessment can be found in examination document ED06 'Sustainability Appraisal Report (SAR) Addendum & Habitats Regulations Assessment (HRA) Screening, Assessment of Further Focused Changes, December 2012'. None of the proposed Further Focused Changes had implications for the finding of the original HRA Report (February 2011). It was concluded that no Further Focused Changes would result in a likely significant effect on any of the European Sites identified either alone or in combination with other projects / plans considering the existing mitigation measures provided by the LDP in its policies for the protection / enhancement of the environment (including European designated Sites). Therefore, no further Appropriate Assessment was required.

Screening Assessment of the recommended Matters Arising Changes (rMACs) and the Matters Arising Changes (MACs) (July 2013)

- 4.9 A Screening Assessment was undertaken of the recommended Matters Arising Changes and Matters Arising Changes in July 2013. This assessment can be found in examination document ED118 'Sustainability Appraisal Report (SAR) Addendum & Habitats Regulations Assessment (HRA) Screening, Assessment of recommended Matters Arising Changes and Matters Arising Changes (July 2013). None of the proposed rMACs or MACs had implications for the finding of the original HRA Report (February 2011). It was concluded that no rMAC or MAC would result in a likely significant effect on any of the European Sites identified either alone or in combination with other projects / plans considering the existing mitigation measures provided by the LDP in its policies for the protection / enhancement of the environment (including European designated Sites). Therefore, no further Appropriate Assessment was required.

Screening Assessment of the Inspector's Changes (December 2013)

- 4.10 In line with the previous iteration of assessment the Inspector's Changes have been screened to identify any implications for the HRA of the Deposit LDP. The assessment is in Table 4.1 overleaf.
- 4.11 None of the Inspector's Changes have implications for the findings of the original HRA Report (February 2011). It is concluded that none of the changes would result in a likely significant effect on any of the European Sites identified either alone or in combination with other projects / plans considering the existing mitigation measures provided by the LDP in its policies for the protection / enhancement of the environment (including European designated Sites). Therefore, no further Appropriate Assessment is required.

TABLE 4.1 - Inspector's Changes and implications for HRA Screening

Ref No	LDP Policy / Para	Nature of Change	HRA Assessment Required
IC01	SAA7 & relevant sections of Monitoring Framework 4.2.63	Amend text of policy SAA7 to reflect the requirement for a link road at Llanfrechfa Grange to be determined through a Traffic Impact Assessment reducing the certainty of delivery of this Link Road.	NO
IC02	Para 7.8.3	Factual updates to the policy and amend text of policy SAA7 to reflect the requirement for a link road at Llanfrechfa Grange to be determined through a Traffic Impact Assessment reducing the certainty of delivery of this Link Road.	NO
IC03	Para 7.8.4	Factual updates to the policy and amend text of policy SAA7 to reflect the requirement for a link road at Llanfrechfa Grange to be determined through a Traffic Impact Assessment reducing the certainty of delivery of this Link Road.	NO
IC04	Para 9.27.4	Amend text of policy T1 to reflect the requirement for a link road at Llanfrechfa Grange to be determined through a Traffic Impact Assessment reducing the certainty of delivery of this Link Road.	NO
IC05	LDP Appendix 1 – Former Police College and Adjacent Land, Cwmbran	Amend LDP Appendix 1 to reflect change to H1/2 (proposed through MAC10.2/MAC10.1) reducing housing numbers on site from 456 to 350 to protect important grassland. This change has been assessed under the HRA Screening as part of the Sustainability Appraisal of the Matters Arising Changes (July 2013).	NO
IC06	Policy S6, Para 5.6.2 & Policy Target 1 of the Monitoring Framework	Amend Policy S6 to reflect reduction in Employment Land Allocations from 42.1ha to 40.3ha	NO
IC07	EET3	Amend Policy EET3 to reflect the reduction in employment allocations for North Torfaen from 10.0ha to 8.0ha, due to the deletion of employment provision at SAA5 The British.	NO

The changes proposed by the Inspector are not significant to the HRA of the LDP. The main change is the reduction in employment provision over the plan period. Whilst a minor change in the context of the overall LDP this reduction in employment provision could help reduce the contribution of the LDP to potential adverse in combination effects on the River Usk SAC through reduced water quality and increased water resource demand although this would not affect the findings of the original HRA Report. The other main change is the reduced certainty over the delivery of the Llanfrechfa Grange Link Road which does not impact on the findings of the HRA, although potential non delivery of this road will reduce surface water run off from non permeable surfaces in the site which is currently greenfield which could have minor positive benefits for water quality.

Other Inspector's Changes are considered to improve the performance of the LDP in contributing to sustainable development and strengthen the contribution of the LDP to protect and enhance biodiversity resources (including European Sites); for example reduction in housing numbers on Police College to protect important grassland (IC05).

The remaining Inspector's Changes are minor in nature such as factual updating, clarification of text, or the addition of detail to the text in order to ensure the LDP is clear. These changes would not affect the findings of the original HRA Report.

