

Flintshire Local Development Plan - Preferred Strategy

Integrated Impact Assessment (Incorporating Sustainability
Appraisal / Strategic Environmental Assessment)
Interim Report

Non-Technical Summary

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Non-Technical Summary

Introduction

As a Local Planning Authority, Flintshire County Council (CC) has a duty to prepare a Local Development Plan (LDP) that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire County. The LDP which will cover the time period between 2015 and 2030, will provide the framework to facilitate the sustainable delivery of growth and development.

When preparing the LDP Preferred Strategy, it is a legal requirement to undertake a Sustainability Appraisal (SA) to ensure that it is developed within the principles of sustainable development. The term Integrated Impact Assessment (IIA) can be used to describe the process of covering more than one type of impact assessment into a single process. Integrating different types of impact assessment into a single process can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations for policy makers. Where more detail on certain issues is required or necessary, this can be undertaken and included within the IIA. This approach has been adopted across Wales, where an integrated approach to assessing the impacts of the strategies, incorporating the requirements of Strategic Environmental Assessment (SEA), SA, Health Impact Assessment (HIA), and Equalities Impact Assessment (EqIA) has been undertaken.

This IIA draws together the following impact assessments:

- SA and SEA (including HIA and EqIA); and
- Habitats Regulations Assessment (Screening will be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate).

Independent consultants, Arcadis Consulting (UK) Ltd., have undertaken the IIA of Flintshire's LDP Preferred Strategy. This Non-Technical Summary provides a high-level summary of the findings of the IIA.

Integrated Impact Assessment Strands

Strategic Environmental Assessment and Sustainability Appraisal

SA is a process for assessing the social, economic and environmental impacts of a Plan as it develops and it aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement under planning law. The law states that the SA must comply with requirements of the European SEA Directive.

Good practice guidance proposes a number of prescribed stages in the SA process, each of which links with stages of the plan-making process. It is important that the SA is able to feed into the plan-making process. This involves the ongoing appraisal of the plan and makes recommendations to help steer its direction to avoid potentially adverse consequences. This is particularly important when considering alternative strategy options. Consultation with statutory bodies (Cadw and Natural Resources Wales (NRW)) and the public is also required at key stages.

Health Impact Assessment

Although a HIA is not a statutory assessment for planners working in Wales, the Welsh Government (WG) increasingly regards it as best practice. It can be a useful tool where there are expected to be significant impacts. As part of the rescoping exercise, we have considered how health concerns and objectives can be incorporated within the updated SA framework.

Equalities Impact Assessment

The Equality Act 2010 includes a public-sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation;
- Advance equality of opportunity; and
- Foster good relations between communities.

Consequently, we are undertaking a high-level assessment of the possible equalities impacts of the Local Plan. This has been integrated into the IIA process. As part of the rescoping exercise, we have considered how equality concerns and objectives can be incorporated within the updated SA framework, especially in light of the Well-being for Future Generations (Wales) Act 2015.

Well-being of Future Generations (Wales) Act

In March 2015, the National Assembly for Wales approved the Well-being of Future Generations (Wales) Act 2015, helping place Wales on a more sustainable path towards achieving well-being. The Act is about improving the social, economic, environmental and cultural well-being of Wales developed around the principle of sustainable development. It gives a legally-binding common purpose – the seven well-being goals – for national government, local government, local health boards and other specified public bodies. It details with the ways in which specified public bodies must work, and work together to improve the well-being of Wales. The re-scoping exercise undertaken in August 2017 revisited the IIA Framework in light of this change in legislation.

Habitats Regulations Assessment

It is a legal requirement that any plan or programme likely to have a significant impact upon a European site protected for nature conservation, which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA). A HRA screening exercise has been undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a European protected site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to NRW for approval. This is a parallel process to the IIA process and will be reported separately.

Scope of the Appraisal

The scope of the IIA was determined through collecting information on the environmental, social and economic characteristics of the area. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the IIA and the LDP. Following the adoption of the Well-being of Future Generations (Wales) Act 2015, the sustainability objectives were re-evaluated in order to ensure consistency with this new Act as well as other assessments that Flintshire CC is undertaking. An updated SA Framework (now an IIA Framework) was submitted to Cadw and NRW for consultation in August 2017 and this amended IIA Framework has been used for the following assessments.

Individual components of the LDP Preferred Strategy have been assessed to determine their sustainability performance and to provide recommendations for sustainability improvements. The following elements have been assessed:

- The LDP's Spatial vision; and

- The LDP's Strategic Policies.

The IIA process is iterative, with regular feedback occurring between the plan-makers and the IIA team as plan options and policies are developed.

Key Sustainability Issues and Opportunities

To ensure that a robust assessment of the emerging LDP is undertaken, it is necessary to understand the existing conditions and characteristics of the Flintshire area, for example, population dynamics, levels of deprivation, health, employment patterns and the condition of housing stock and its affordability. These are detailed in the IIA Report. The list below identifies the sustainability topics covered in the IIA. Details of the identified issues and opportunities are provided in the IIA Report.

- Population: pressure on health services, residential housing, services for the older generation, the fall in the numbers of young people resulting in less care for the elderly.
- Education and qualifications: number of Lower Super Output Areas (LSOAs - a geographic area to better report on small area statistics in the UK) in the bottom 10% as a percentage of working residents with National Qualifications Framework (NQF) level 4 or above.
- Biodiversity: impacts on national and international sites from development, effects on species from increasing populations, variation across the County of residents able to access green space.
- Landscape and townscape: vulnerability of the valuable townscapes / landscape character of County to, for example, new developments.
- Soil and geology: Mining, in its various guises, as well as heavy industry, has left a legacy of land contamination and residual contaminated land and the need for remediation. The geology of the County results in there being considerable mineral resources.
- Water: increased threat from surface water flooding, coastal flooding and flooding and the mobilisation of contaminants linked to contaminated land. Potential consequences for the River Dee and the Dee Estuary associated with water supply and abstraction for new developments, should problems like drought be stimulated.
- Air quality and climate change: climate change could lead to increased flood and or drought events. New development in areas such as Deeside could impact on the Dee Estuary.
- Cultural Heritage: risks associated with climate change, including extreme weather events posing problems for managing and conserving cultural heritage. Also there is potential for undiscovered archaeological remains to exist.
- Minerals and Waste: Depletion of valuable finite mineral resources. Opportunities should be sought to safeguard mineral assets for future generations, this would also be supported through the sustainable extraction of minerals.
- Human health: varying levels of deprivation occur across the County with the coastal strip particularly affected. There are pressures associated with an increasingly ageing population, associated health service and care needs. There are opportunities for health improvements, quality of life and the economy through the provision of healthcare and key services.
- Local economy: There are pockets of deprivation along the coastal strip, with income and employment levels comparatively low compared to the more rural parts of the County. There is an increased number of Job Seekers Allowance (JSA – benefit paid to those seeking work) claimants. There are currently two Flintshire LSOAs in the bottom 10% for employment deprivation. There has also been a fall in the proportion of Flintshire residents economically active which may lead to a labour shortfall.
- Housing: high percentage of LSOAs in the bottom 10% of housing deprivation, shortage in the amount of affordable housing, the rising number of Houses in Multiple Occupation (HMOs).
- Deprivation and Living Environment: high levels of deprivation and potential for improvements. Crime: deprivation in relation to crime levels and potential opportunities for design measures.

- Transportation: accessibility and connectivity; congestion; opportunities for more sustainable modes of transport and improved connectivity, increasing commuter distances. Accessibility is a particular issue in rural areas.

IIA Framework for Assessment

The IIA Framework underpins the assessment methodology and comprises a series of sustainability objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. The IIA Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issue and opportunities. The IIA Framework was amended following receipt of the Scoping Report consultation responses from statutory consultees in 2015. The following IIA Objectives form the basis of the IIA Framework. These are supported by a series of sub-objectives, indicators and targets, which can be found in the IIA Report (Table 3-5):

- 1 To reduce crime, disorder and fear of crime
- 2 To improve levels of educational attainment for all age groups and all sectors of society
- 3 To improve physical and mental health and wellbeing for all and reduce health inequalities
- 4 To provide access to good quality, affordable housing that meets the needs and requirements of the community
- 5 To improve sustainable access to basic goods, services and amenities for all groups
- 6 To build strong and cohesive communities
- 7 To promote a sustainable economy, business development and investment
- 8 To provide employment opportunities across the County and promote economic inclusion
- 9 To maintain and improve the quality of life in rural areas
- 10 To protect and enhance biodiversity and geodiversity
- 11 To conserve and enhance the County's landscape and townscape character and quality
- 12 To protect and enhance the cultural heritage assets
- 13 To protect and enhance the quality of water features and resources
- 14 To reduce the risk of flooding
- 15 To protect and improve air quality and limit greenhouse gas emissions
- 16 To increase energy efficiency, require the use of renewable energy and sustainable building design
- 17 To ensure sustainable use of natural resources
- 18 To encourage the protection and promotion of the Welsh Language

Developing and Refining Options and Assessing Effects:

Spatial Options

Government guidance advises that only reasonable alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects.

The LDP Spatial Options and growth scenarios were assessed and reported on in October 2016.

Spatial Vision and Objectives

Good practice guidance recommends that the key aims and principles of the plan should be assessed against the IIA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles.

The Spatial vision for Flintshire has been reviewed against the IIA Objectives, and a summary of the key strengths, weaknesses and recommendations are presented in the IIA Report. The assessment of the Spatial Vision has been undertaken during the IIA using a simple matrix based approach. Chapter 5 of the IIA Report presents the complete compatibility of the LDP Objectives against the IIA Objectives.

Appraisal of Local Development Plan Policies

The LDP policies were assessed against the IIA Objectives using a matrix-based approach and was first begun in the LDP Options Appraisal that was assessed in October 2016. This matrix allowed the identification of positive and negative impacts, as well as the potential for cumulative effects to occur. Mitigation measures and recommendations were suggested to offset or alleviate any predicted adverse impacts, or to enhance any opportunities that were identified. This iterative process has been continued into the LDP Preferred Strategy and to which this report relates.

A summary of the assessment of these preferred policies is provided in Chapter 6 of the IIA Report. The complete results of the assessment are presented in Appendix D.

In summary, the majority of predicted effects were positive against the social, economic and environmental objectives. The assessment of the LDP led to the prediction of major positive effects against all of IIA objectives, and the strategic policies currently being proposed will clearly set the tone for Flintshire's detailed policies that will be developed. The strategic policies around the scale and location of development (STR1 and STR2) were assessed together in order to ensure that any synergies between the two policies was captured, and most relevantly seen on housing, employment and economy objectives. STR3 provides 2 strategic sites (Northern Gateway and Warren Hall) that will form the bulk of new housing stock within Flintshire, as well as providing new employment spaces. The clear identification of these sites will help meet a variety of IIA objectives in terms of housing, economy as well as environmental objectives, though it is expected that more detail will ensure that mitigation can be appropriate. STR4, STR5 and STR6 provide the strategic direction for how design, transport, services should be considered within Flintshire and all seek to ensure the tenets of sustainable development are met.

The remaining policies (STR7-STR16) provide greater detail on particular issues of concern for the Council – ranging from climate change to tourism to environmental protection and ensuring minerals for the county, to name a few. These policies seek to ensure that, within their respective direction, Flintshire's preference for strong economic growth will be balanced against its social and environmental obligations. Although Flintshire has taken the strategic approach to ensure its economic recovery and plan for sustained future economic success, the policies still manage to ensure that other aspects of sustainable development such as social and environmental concerns, can be mitigated for. Some policies can be strengthened further and a series of recommendations for changes has been made within this report.

The IIA carried out and reported on within this report should help clarify the detailed Policies and site allocations that will be developed as the LDP progresses and provide greater focus what those policies will mean for specific areas within Flintshire.

Next Steps

This IIA Report has now been issued for consultation alongside the LDP Preferred Strategy to all key stakeholders (including statutory consultees and the public) for comment. The Preferred Strategy

along with this accompanying IIA Report and associated appendices will be consulted on. Following the close of the consultation period, Flintshire CC will review the feedback and incorporate it into the Deposit LDP.

If you would like to comment on this IIA Report, please send comments to:

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or

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Abbreviations

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CIL	Community Infrastructure Levy
CC	County Council
cSAC	Candidate Special Area of Conservation
DECC	Department of Energy and Climate Change
EqIA	Equalities Impact Assessment
HER	Historic Environment Record
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HMO	Houses in Multiple Occupation
IIA	Integrated Impact Assessment
JSA	Job Seekers Allowance
LDP	Local Development Plan
LNR	Local Nature Reserves
LSOA	Lower Super Output Area
NNR	National Nature Reserves
NVQ	National Vocational Qualification
ONS	Office for National Statistics
OPDM	The Office of the Deputy Prime Minister's
pSPA	Potential Special Protection Areas
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SM	Scheduled Monument
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage Systems
TAN	Technical Advice Note
WAG	Welsh Government
WCED	World Commission on Environment and Development

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