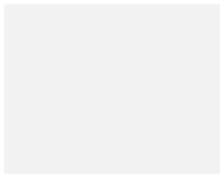


FLINTSHIRE LOCAL DEVELOPMENT PLAN - DEPOSIT

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

September 2019

CONTACTS



JOSEPH EVANS
Environmental Consultant

Arcadis.
5th Floor,
401 Faraday Street
Birchwood Park
Warrington
WA3 6GA

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ABBREVIATIONS

ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CC	County Council
cSAC	Candidate Special Area of Conservation
EqIA	Equalities Impact Assessment
GHG	Greenhouse Gas
HCAC	Hope / Caergwrle / Abermorddu / Cefn y Bedd
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
IIA	Integrated Impact Assessment
LDP	Local Development Plan
LNR	Local Nature Reserves
LSOA	Lower Super Output Area
LWS	Local Wildlife Site
NVQ	National Vocational Qualification
ONS	Office for National Statistics
OPDM	The Office of the Deputy Prime Minister
PPW	Planning Policy Wales
PRoW	Public Rights of Way
pSPA	Potential Special Protection Areas
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Sites of Community Interest
SM	Scheduled Monument
SME	Small and Medium Enterprises
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
UDP	Unitary Development Plan
WG	Welsh Government

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Non-Technical Summary

Introduction

Flintshire County Council (CC) is currently preparing its new Local Development Plan (LDP). The LDP will set out proposals and policies for guiding and managing development in the County until 2030. The process of preparing the LDP involves an iterative approach including public consultation on the various issues and options to be considered. The Council consulted on a 'preferred options' version of the LDP in 2017, which set a proposed range of strategic policies for the County. Following this, the Council have now prepared the Deposit version of the LDP. The Deposit version builds on the preferred options consultation and, in addition to the refined strategic policies (in light of consultation responses), it proposes different sites in the county for different types of development, as well as a range of 'development management' policies to help ensure new development in the County is sustainable.

Arcadis Consulting (UK) Limited (Arcadis) (formerly Hyder Consulting (UK) Ltd.) was commissioned to prepare an 'Integrated Impact Assessment' (IIA) of the LDP. This is a Non-Technical Summary (NTS) of the IIA, providing a summary of the IIA process and its findings. The NTS will be subject to public consultation along with the LDP and the IIA.

What is an Integrated Impact Assessment?

The IIA has provided a means of efficiently and robustly assessing the LDP whilst satisfying the legislative requirements of each impact assessment. In so doing, it has provided an assessment of the social, economic and environmental effects of proposals in the LDP. This includes compliance with the requirements of the European SEA Directive. The IIA also integrates the findings of the HRA, which is a parallel process under the HRA Directive. The impact assessments that are integrated into the IIA are:

- Strategic Environmental Assessment;
- Sustainability Appraisal;
- Health Impact Assessment;
- Equalities Impact Assessment; and
- Habitats Regulations Assessment.

The IIA commenced at an early stage of the LDP preparation process to help ensure that sustainability considerations were an integral component of the plan-making process. Findings and recommendations in each IIA document have helped to develop the strategies, policies and site allocations within the LDP. Consultation with statutory bodies (Cadw and Natural Resources Wales (NRW)) and the public has been undertaken at key stages. The IIA Report – Environmental Report, documents the process and findings in detail.

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 creates a legally-binding common purpose – the seven well-being goals. It sets out the ways in which specified public bodies must work, 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.

The Local Development Plan

Flintshire is a county in the north-east of Wales that borders England and sits just south of the Dee Estuary. The Deposit LDP is the version of the LDP that Flintshire CC intend to submit for Examination in Public and will ultimately seek to adopt. The LDP will cover the period until 2030 and would replace the Adopted Unitary Development Plan currently guiding development in Flintshire.

The LDP sets out a range of proposals for the County, including a spatial vision, objectives for achieving the vision, sites allocated for certain types of development and policies for guiding this. The sites allocated for development are where the Council will seek to deliver either residential or employment development (or a mixture of both).

Scope of the Integrated Impact Assessment

At the very start of the IIA process, an appropriate ‘scope’ for the IIA was determined. This first took place in 2015 but was also updated in 2017 to take into consideration the Welsh Government’s adoption of the Well-being of Future Generations (Wales) Act 2015, as well as to ensure that health, equalities, cohesive communities and protection of the Welsh language were incorporated into the assessment process.

The geographical scope of the IIA is the same as the LDP i.e. the county of Flintshire. However, ‘transboundary effects’ (i.e. effects of the LDP in areas neighbouring Flintshire) are also considered. The temporal scope of the IIA is also the same as the LDP i.e. it covers the period until 2030. However, in line with legal requirements, the LDP identifies effects that are long term (i.e. beyond 2030) and non-reversible or permanent.

The scoping process first provided a review of the key sustainability issues and relevant plans, policies and environmental protection objectives (PPPs) in the County. This review identified PPPs of international significance, such as the EU Habitats Directive, national significance, such as the Wales Spatial Plan, regional significance, such as the North Wales Joint Transport Plan, and local significance, such as the Deeside Plan. The PPPs are set out in their entirety in the SA Scoping Report. They were analysed for their relevance to the IIA and the LDP and helped to inform decision making on what the key sustainability issues in Flintshire are and how these can, or should be, tackled through the LDP.

To identify the key sustainability issues in Flintshire, a wide range of data was collected to understand the existing conditions and characteristics of the county. This is referred to as the environmental baseline and included aspects such as population dynamics, levels of deprivation, the condition of biodiversity designations, the prevalence of heritage assets, the housing stock and employment statistics. Following a careful review of this baseline, the key sustainability issues and opportunities for the county were identified. Briefly, these were based around the following topic areas:

- Pressures associated with an increasingly ageing population in Flintshire are likely to cause issues across the County;
- Opportunities to raise the number of working age Flintshire residents with good qualifications;
- Population and development pressure on protected and non-protected sites for nature conservation as well as habitat connectivity;
- The need for equitable access to green spaces;
- Potential pressure from development to valuable townscapes and landscape character;
- Legacy of lead mining leading to areas of residual land contamination;
- Need to preserve and enhance regionally important sites for geology;
- Increased threat from surface water flooding due to increased precipitation rates generated by climate change;
- Higher likelihood of coastal flooding as a result of rising sea levels due to climate change;
- Risks associated with flooding and the mobilisation of contaminants linked to contaminated land within the County;
- Opportunity to improve the potential for a reduction in the emission of greenhouse gases;
- Opportunity to improve the County’s ability to adapt to the effects of climate change;
- Potential risks from development to designated and non-designated heritage assets and undiscovered archaeological remains throughout the County;
- Depletion of valuable mineral resources within the County and opportunities to safeguard assets for future generations;
- Opportunities to increase recycling, reuse and composting of waste which would otherwise be sent to landfill;
- There are pockets of health deprivation in the County;
- Poor levels of physical activity amongst the local population compared to recommended guidelines;
- Healthcare opportunities should be sought in order to reduce the increased mortality rate across Flintshire;
- There are pockets of employment deprivation across the County and there has been an increase unemployment and people claiming unemployment benefits;

- Opportunities should be sought to encourage inward investment to provide employment and business opportunities;
- There are pockets of housing deprivation in the County; a shortage of affordable housing; and a rising level of houses of multiple occupation;
- Opportunities should be sought to provide housing that meets local needs including the provision of affordable housing;
- There is a high percentage of areas within Flintshire that are experiencing deprivation in relation to the physical environment;
- Some of the town centres are showing a decline within the County;
- There is a need to build upon falling crime rates and reduce fear of crime;
- There is an opportunity to reduce inequalities across the County, including areas where there are high levels of deprivation amongst children;
- There is an increased dependence on travel by car and increasing usage of cars/vans to get to work and the distances travelled are increasing;
- There is concern in populated areas about transport and accessibility to key services including hospitals;
- There are a high number of deaths/serious injuries on Flintshire's roads compared to the national average;
- Opportunities should be sought to reduce car/van transport and increase the use of greener more sustainable modes of transport;
- Fluency in Welsh in Flintshire appears to be increasing, though the rate of rise in non-fluency is faster, suggesting an overall decline of Welsh speakers within the County.
- Opportunities to increase exposure to the Welsh language should be sought.

IIA Framework

The IIA Framework uses a set of objectives and sub-objectives. The objectives and sub-objectives were designed based on a detailed review of PPPs, as well as the baseline environmental data and key issues and opportunities. The IIA Objectives used to assess the Flintshire LDP are presented in Table 1. Each proposal in the LDP has been assessed for the extent to it is compatible with these objectives or may have a positive or negative effect on them.

Table 1: Objectives and sub-objectives comprising the IIA Framework

IIA Objective and Sub-Objectives	
1. To reduce crime, disorder and fear of crime	
	<ul style="list-style-type: none"> • To reduce levels of crime • To reduce the fear of crime • To reduce levels of anti-social behaviour • To reduce burglary rates • To encourage safety by design
2. To improve levels of educational attainment for all age groups and all sectors of society	
	<ul style="list-style-type: none"> • To increase levels of participation and attainment in education for all members of society • To improve access to and involvement in lifelong learning opportunities • To improve the provision of education and training facilities • To improve qualification and skills for all parts of the community
3. To improve physical and mental health and wellbeing for all and reduce health inequalities	
	<ul style="list-style-type: none"> • To improve access to health and social care services especially in isolated areas • To reduce health inequalities amongst different groups in the community • To promote healthy lifestyles • Encourage the development of strong, cohesive communities
4. To provide access to good quality, affordable housing that meets the needs and requirements of the community	
	<ul style="list-style-type: none"> • Ensure that there is sufficient housing to meet identified needs in all areas, including rural housing • Ensure that housing meets acceptable standards • Increase the availability of affordable housing • Increase availability of housing for independent living • Reduce levels of homelessness • Reduce number of households in income poverty

IIA Objective and Sub-Objectives	
5. To improve sustainable access to basic goods, services and amenities for all groups	<ul style="list-style-type: none"> • Ensure that public transport services meet all people's abilities and needs • Ensure that highways infrastructure meets people's needs (including walking and cycling routes) • Promote the use of sustainable travel modes and reduce dependence on the private car • Improve access to cultural and recreational facilities, including Welsh culture and heritage • Maintain and improve access to essential services and facilities, including in rural areas • Improve access to open space • Conserve and enhance opportunities for public access to the countryside and coast
6. To build strong and cohesive communities	<ul style="list-style-type: none"> • Improve social cohesion and equality opportunities • Reduce gender/age/disability/ gender/race/religion inequalities • Ensure children who have any kind of disability can lead full and independent lives • Ensure children can live to a standard that is good enough to meet their physical and mental needs • Ensure children can develop healthily, and have access to good quality health care, clean water, nutritious food and a clean environment
7. To promote a sustainable economy, business development and investment	<ul style="list-style-type: none"> • To encourage economic growth • To diversify the economy and encourage new business formation and inward investment • To encourage and promote sustainable tourism within the County.
8. To provide employment opportunities across the County and promote economic inclusion	<ul style="list-style-type: none"> • To increase local employment opportunities across the County • To improve access to jobs • Maximise traineeship and apprenticeship opportunities • To reduce levels of child and fuel poverty within the County
9. To maintain and improve the quality of life in rural areas	<ul style="list-style-type: none"> • To support rural diversification • To encourage ICT / broadband links in rural areas
10. To protect and enhance biodiversity and geodiversity	<ul style="list-style-type: none"> • To protect and enhance designated sites of nature conservation importance • To protect the integrity of European, proposed European and listed Ramsar sites, or where not at a favourable conservation status, enhance their interest features • To protect and enhance wildlife especially rare and endangered species • To protect and enhance habitats and wildlife corridors • To conserve, enhance and create appropriate wildlife habitats and wider biodiversity in urban and rural areas • To avoid damage or fragmentation of designated sites, habitats and protected species and encourage their enhancement and connection • To provide opportunities for people to access wildlife and open green spaces • To protect and enhance geodiversity
11. To conserve and enhance the County's landscape and townscape character and quality	<ul style="list-style-type: none"> • To protect and enhance areas of landscape character and quality • To protect and enhance townscape character and quality • To respect and enhance local distinctiveness and diversity • To promote sensitive design in development • To protect and enhance the enjoyment of geological resources
12. To protect and enhance the cultural heritage assets	<ul style="list-style-type: none"> • To protect and enhance heritage assets including Listed Buildings, Scheduled Monuments and Historic Landscapes • To protect and enhance historic landscape value
13. To protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> • To protect and enhance ground and surface water quality • To protect and enhance coastal waters • Encourage sustainable use of water resources
14. To reduce the risk of flooding	<ul style="list-style-type: none"> • To encourage the inclusion of flood mitigation measures such as sustainable urban drainage systems • To reduce and manage flooding
15. To protect and improve air quality and limit greenhouse gas emissions	

IIA Objective and Sub-Objectives	
	<ul style="list-style-type: none"> To protect and improve local air quality To reduce greenhouse gas emissions including in both existing and new development To reduce CO2 emissions from the transport sector To encourage all new development to be climate change resilient To reduce negative effects of power generation, heavy industries and transport on local air quality To encourage cleaner technology for power regeneration, heavy industry and transport
16. To increase energy efficiency, require the use of renewable energy and sustainable building design	<ul style="list-style-type: none"> To reduce the demand for energy and increase energy efficiency To encourage sustainable building design To increase the use of renewable energy To increase the use of renewable energy To increase energy efficiency
17. To ensure sustainable use of natural resources	<ul style="list-style-type: none"> Reduce the demand for raw materials Promote the use of recycled and secondary materials in construction Ensure that contaminated land will be guarded against Encourage development of brownfield land where appropriate Maintain and enhance soil quality Increase the proportion of waste recycling and re-use Reduce the production of waste Reduce the proportion of waste landfilled To protect peatland within the County
18. To encourage the protection and promotion of the Welsh Language	<ul style="list-style-type: none"> Contribute to an increase in the number of Welsh language speakers across Flintshire Contribute to an increase in the proportion of Welsh language speakers who are fluent across Flintshire Contribute to an increase in the number of people who speak Welsh daily and who can speak more than just a few words of Welsh

Developing and Refining Options and Assessing Effects

Reasonable Alternatives

The SEA Directive requires a local planning authority to identify reasonable alternatives to their Plan, to predict and evaluate the significant environmental effects of these alternatives and to justify their Plan in light of the alternatives available to them. The intention is that when Council's propose policies or site allocations in the LDP are selected based on evidence and justified in light of the alternatives available to them. It is essential that stakeholders are presented with an accurate picture of what reasonable alternatives have been considered why they are not considered to be the best option. Studying alternatives also helps to find ways of reducing or avoiding negative environmental effects of preferred options.

It is considered that the Council have undertaken a thorough and legally compliant approach to reasonable alternatives. They have identified a broad range of alternatives to proposals in the LDP and have robustly justified their selection of options in light of these. In particular, the Council have closely considered the alternatives available to them for the quantity of growth that the LDP should seek to provide for, the overall spatial distribution for accommodating this growth and the specific sites for development. The IIA process has provided the Council with a detailed assessment of all options and reasonable alternatives and this information has enabled the Council to factor in the sustainability performance of different options and alternatives when preparing the LDP.

Strategic Options

At an early stage of the LDP and IIA processes the Council explored the different quantities of growth that would be appropriate to achieve in Flintshire by 2030 and overall spatial distributions of development that could accommodate this growth. The Council consulted on the Strategic Options LDP document in late 2016, within which they presented a range of reasonable alternatives for growth and spatial distribution. In October 2016 an early IIA report was also published and consulted on, within which the sustainability performance of the different strategic options was predicted and evaluated. Overall, six growth options and five spatial distributions were considered:

- **Growth Option 1:** 250 new homes a year;
- **Growth Option 2:** 320 new homes a year;
- **Growth Option 3:** 550 new homes a year;
- **Growth Option 4:** 440 new homes a year;
- **Growth Option 5:** 690 new homes a year;
- **Growth Option 6:** 440 – 490 new homes a year;
- **Spatial Option 1:** a settlement hierarchy which allows for a proportional distribution of development based on sustainability principles;
- **Spatial Option 2:** directing all development to urban centres i.e. the upper two tiers of the settlement hierarchy;
- **Spatial Option 3:** development would be focussed by directing all development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan;
- **Spatial Option 4:** development would be distributed based on a strict interpretation of key road and rail transport hubs and route;
- **Spatial Option 5:** development would be focussed on the first three tiers of the settlement hierarchy, based on identifying the most sustainable settlements and sites. In the rural settlements a more refined policy approach would be developed to ensure that a more flexible approach is taken to bringing about and delivering local needs housing.

The October 2016 IIA report provided an assessment of the spatial options under each of the growth scenarios. Overall, the strategic options were predicted as having mostly similar effects on natural environmental themed IIA Objectives as it was anticipated that most sites coming forward for development would be greenfield land. Most developable land within Flintshire is located near to the coast or rivers, particularly within the Deeside Area. Although this is protected by flood defences, negative effects were assigned on a precautionary basis. Similarly, it is expected that the growth within the County will lead to increased car use, energy consumption, waste production and use of natural resources.

A greater variation was seen between the options for the assessments against social and economic IIA Objectives. Under Spatial Option 1, the highest growth scenario would be likely to provide the greatest benefits to Flintshire in terms of being able to provide new and infrastructure for the County. However, the higher growth scenarios could fail to recognise that some settlements do not have capacity to meet such a growth in housing numbers.

Options 2, 3 and 4 perform similarly with regard to the social and economic objectives, as they are all particularly focussed on a particular geographical aspect of development. Across the assessments, concerns were raised that whilst these will ensure that growth is coupled with the drive to improve Flintshire's economy, such growth strategies could have a negative impact on the rural life objective or create an imbalance of employment across Flintshire by focussing development around the Deeside Enterprise Zone.

Option 5 is a variation of Option 1 but uses a more case-by-case approach to ensure that rural growth and viability is guided by local circumstances. Spatial Option 5 was taken forward to inform the Preferred Strategy.

Vision, Objectives and Strategic Policies

Following the Strategic Options consultation, the Council prepared the Preferred Strategy LDP document that was consulted on between November and December 2017. The Preferred Strategy set out the Council's preferred options for growth and spatial distribution. It also proposed a Vision for Flintshire to be achieved by 2030 as well as a number of Strategic Objectives designed to help achieve this Vision. The Strategic Objectives are clear statements of intent which focus in on how the LDP Vision will be delivered. Like the Vision, they take the key challenges facing the County and align them with the three themes of sustainable development:

- Enhancing Community Life - these Strategic Objectives aim to ensure that all parts of Flintshire are given the same opportunities to develop into sustainable societies for all members of the community. The development of town and district centres and the focus on such areas for regeneration needs to be carefully managed to ensure that sustainable transport links are encouraged. Car use is an increasing issue in Flintshire, which is a largely rural county, but not all members of a community are able or willing to drive.
- Delivering Growth and Prosperity - these Strategic Objectives aim to ensure Flintshire can continue to be an area of economic growth for Wales as well as the Deeside sub-region and has the right kind of supporting development that will encourage businesses to invest in the area. The objective on diversifying the rural economy needs to be mitigated for in relation to the IIA objective on air quality. Reliance on the private car will only lessen if other transport options are developed, particularly within rural communities.
- Safeguarding the Environment - these Strategic Objectives aim to ensure that Flintshire's natural and historical environments continue to be protected, that its green infrastructure network will be enhanced, as well as ensuring continued economic growth. In the main, these objectives perform well against the IIA Objectives. There is Good design that is innovative may mean a detraction from traditional building techniques for which an area is known so these need to be considered carefully for all future developments.

The Preferred Strategy LDP also set out a range of Strategic Policies for Flintshire. The six policies under the banner of Creating Sustainable Places and Communities seek to set the scene and provide clear direction as to how Flintshire will be LDP period. The policies seek to ensure that employment is the main driving factor for Flintshire's continued growth which will, in turn, encourage inward investment and bring about improvements in Flintshire's services and infrastructure. The four policies under the banner of Supporting a Prosperous Economy seek to provide a strategy on how Flintshire's economy will be supported throughout the lifetime of the LDP by a wide range of economic streams for growth from retail, to sustainable tourism and strategic employment sites, focussed around the Deeside/Broughton area. The policies seek to ensure that employment is successful and will aid Flintshire's economic recovery, particularly after the global recession. The two policies within the Meeting Housing Needs banner relate to provision of housing sites as well as specific provision for other types of communities, such as gypsies, travellers and travelling showpeople. The policies within Valuing the Environment seek to provide a range of environment related guidance for the development and protection of Flintshire's assets. Strong environment policies in the LDP will ensure that the environmental impact of the growth proposals is minimised as much as possible.

Accompanying the 2017 consultation on the Preferred Strategy LDP was an IIA Report that provided an assessment of each strategic policy. The Strategic Policies were predicted to result in a range of sustainability impacts. It is expected that they would help to ensure that development needs in Flintshire, including housing and employment development, are met and this would make a significant contribution towards reducing homelessness, unemployment, deprivation, poverty and inequality and would be highly beneficial to the physical and mental health and wellbeing of local people. It is likely that local active travel and public transport options would improve over the LDP period whilst rates of Welsh speaking is preserved and enhanced. There is a risk that the scale of development pursued through these policies could lead to negative impacts on the array of important biodiversity assets in Flintshire, as well as sensitive landscapes in some locations. The increase in homes and jobs would also be likely to lead to a net increase in water, energy and natural resources consumption whilst increasing local emissions and the amount of waste being generated.

Deposit LDP

Following consultation on the Preferred Strategy LDP, the Council began preparing the Deposit LDP (the version currently out for consultation). This IIA report accompanies this version of the LDP, which in addition to the Vision, Strategic Objectives and strategic options also proposes development management policies and sites for development.

Development Management policies are designed to help steer development towards being increasingly sustainable and to ensure that it contributes towards achieving the Vision for the County. The Deposit LDP proposes development management policies under four themes:

- **Creating Sustainable Places and Communities:**
Development management policies under this theme were consistently predicted to make positive contributions towards most IIA Objectives with a range of significant positive effects predicted. Overall, these policies would be likely to help ensure that new development in Flintshire is of a scale, type and location that is relatively sustainable and that contributes towards the formation of high-quality and resilience places. In particular, these policies would be likely to make a major contribution towards reducing crime and the fear of crime; improving the health and wellbeing of local people; protecting and enhancing biodiversity and landscapes and reducing the County's carbon footprint and GHG emissions.
- **Supporting a Prosperous Economy:**
Development management policies under this theme would be expected to help ensure that new development in Flintshire over the Plan period is of a scale, type and location that ensures local and county-wide employment needs are met whilst the County's economy can grow, diversify and play an important role in the regional economy. Major positive effects were predicted for these policies against IIA Objectives 7 and 8, which focus on employment and the economy, with minor positive effects predominantly predicted elsewhere. The only negative effects predicted were minor negative effects predicted against the natural resources objective, primarily due to the potential losses of soils caused by development on greenfield.
- **Meeting Housing Needs:**
Development management policies under this theme would help to ensure that over the Plan period the varied needs of Flintshire's growing population can be satisfied. These policies would be expected to make a major contribution towards ensuring new and existing people in Flintshire can live in safe and high-quality homes that are of a scale, location and type that is appropriate to local needs, enables relatively sustainable living and contributes towards cohesive communities. A very limited number of potentially minor negative effects were predicted, predominantly due to the risks associated with new development, such as the loss of greenfield and open space, as well as the influx of new residents potentially increase visitor access associated disturbances on sensitive habitats.
- **Valuing the Environment:**
Policy EN25 allocates sites for solar farm development and so this policy is considered further. These policies were consistently predicted to result in positive effects on IIA Objectives, regularly evaluated as being significantly positive, with no negative effects predicted. It is highly likely that these policies would help to ensure that new development in Flintshire is designed, managed, constructed, laid out, located and scaled in a way that helps to minimise risks to the natural environment whilst maximising opportunities for enhancing the environment. These policies were particularly predicted to result in significant positive effects on IIA Objectives related to protecting and enhancing biodiversity and landscapes/townscapes.

Within some of the development management policies the Council have allocated various sites in Flintshire for particular types and quantities of development in order to ensure that the County's development needs over the Plan period are satisfied. The Deposit LDP sets out the Council's preferred options for site allocations. To arrive at these selections the Council has considered a large

number of different locations in Flintshire and assessed them based on their viability, deliverability, availability, sustainability and the extent to which they conform with the Preferred Strategy. Overall, the sites are allocated for development are listed in Table 2.

Table 2: Sites allocated for development in the Deposit LDP

LDP Policy / site ref.	Location	Proposed/potential development
Allocated sites		
PC12.1	Community Centre, Woodlane	Community Facilities
PC12.2	Greenfield Cemetery	Community Facilities
PC12.3	Treuddyn Cemetery	Community Facilities
H1.1	Well Street	Housing
H1.2	Broad Oak holding, Mold Road	Housing
H1.3	Highmere Drive, Connah's Quay	Housing
H1.4	Northop Road	Housing
H1.5	Maes Gwern	Housing
H1.6	Land between Denbigh Road and Gwernaffield Road	Housing
H1.7	Holywell Road / Green Lane	Housing
H1.8	Ash Lane	Housing
H1.9	Wrexham Road	Housing
H1.10	Cae Isa, A5119	Housing
H1.11	Chester Road	Housing
HN8.1	Magazine Lane	Gypsy and Traveller Sites
HN8.2	Gwern Lane	Gypsy and Traveller Sites
HN8.3	Riverside Park	Gypsy and Traveller Sites
HN8.4	Castle Park	Gypsy and Traveller Sites
EN25.1	Hendre Quarry	Minerals Development
EN25.2	Pant y Pwll Dwr Quarry	Minerals Development
EN25.3	Ddol Uchaf Quarry	Minerals Development
EN25.4	Fron Haul Quarry	Minerals Development
PE1.1	Manor Lane, Chester Aerospace Park	Employment
PE1.2	Manor Lane, Hawarden Park Extension	Employment
PE1.3	Drury New Road	Employment
PE1.4	Greenfield Business Park Phase II	Employment
PE1.5	Greenfield Business Park Phase III	Employment
PE1.6	Broncoed Industrial Estate	Employment
PE1.7	Mold Business Park	Employment
PE1.8	Adjacent Mostyn Docks	Employment
PE1.9	Chester Road East	Employment
PE1.10	Antelope Industrial Estate	Employment
PE1.11	River Lane	Employment
PE1.12	Rowley's Drive	Employment
STR3A	Northern Gateway Mixed Use Development Site	Mixed use strategic site
STR3B	Warren Hall Mixed Use Development Site	Mixed use strategic site
EN13.1	Crump's Yard, Dock Road	Solar Farms
EN13.2	Castle Park	Solar Farms

- Housing site allocations summary of effects:**

- The assessments of housing site allocations identified a range of effects. A limited number of the residential site allocations coincide with land at risk of flooding and so careful siting of the development will need to be considered, to ensure new homes are not at risk. Many of the sites, particularly those in Local Service Centres and Sustainable Villages, are in proximity to natural waterbodies and so there could be a risk of new construction and occupation posing a risk to water quality in some locations.
- Minor negative effects on most natural environment objectives couldn't be ruled out in many cases. The construction and occupation of new homes would be likely to result in an increase in the consumption of natural resources in relation to existing levels, as well as water and air. Many of the sites are greenfield and so new development in these locations would be likely to

- result in the loss of soils whilst posing a risk to local ecological connectivity, the character of the surrounding area and the setting of nearby heritage assets.
- The allocation of these sites would help to ensure that the varied housing needs of Flintshire's growing population over the Plan period can be satisfied. The location of the housing sites generally help to ensure that new residents would have good or excellent access to key services, amenities and spaces including schools, health centres, employment areas, community centres, retail areas and recreational opportunities.
 - **Employment site allocations summary of effects:**
 - The proposed employment site allocations in the Flintshire LDP are generally in highly accessible locations and would be expected to make a major contribution towards ensuring that employment needs in the County over the Plan period can be satisfied. The local economy would be expected to significantly benefit from each site due to the provision of new land for new and expanding businesses to operate and succeed. The provision of new employment opportunities would be likely to contribute towards reducing crime rates in Flintshire whilst enhancing the range of skills learning opportunities for local people.
 - Many of the employment sites are within high flood risk areas and careful siting of development could be required to ensure new development avoids flood risk with which it is incompatible. In some locations of Flintshire new employment development could potentially pose a risk to the local character, although this is partly dependent on details of the design and layout of such development. New employment development would also be likely to lead to an increase in emissions, energy and resource consumption associated with business operations.
 - **Mixed-use strategic site allocations summary of effects:**
 - The Deposit LDP allocates to strategic sites for mixed-use development through Policy STR3. Both sites would make a significant contribution towards satisfying Flintshire's growing and varied housing and employment needs and could make a major boost to the local economy.
 - Given the size of these sites, and that a large portion of both sites is greenfield, there is a risk of negative effects on natural environment objectives but particularly natural resources given the likely significant losses of ecologically and agriculturally important soils. STR3b is in proximity to natural waters and contains land at a high risk of flooding and so careful siting of the development could be required. STR3A is in an area of high crime levels and so could expose new site users to a higher risk of crime than other areas of Flintshire.
 - Community Facilities
 - Given the nature of community facilities, effects on most IIA Objectives are expected to be neutral or negligible. The provision of these facilities, which are generally in accessible locations, would be likely to deliver benefits to the local community and could help to reduce the risk of crime or anti-social behaviour. Each site could potentially pose a minor risk to the local ecological connectivity and landscape/townscape character.
 - **Gypsy, Traveller and Travelling Showpeople site allocations summary of effects:**
 - The proposed Gypsy, Traveller and Travelling Showpeople site allocations in the Deposit LDP would help to ensure that the needs of this community in Flintshire are satisfied over the Plan period. These sites are generally in highly accessible locations and would provide site users with good access to key services amenities and facilities. Due to the nature of the location of these sites, which are typically adjacent to habitats and greenfield land. The proposed site development could also lead to a very minor increase in the consumption of energy, resources and water in relation to existing levels.
 - **Minerals Development site allocations summary of effects:**
 - Policy EN25 allocates four mineral sites for extensions to the mineral development. Expansions of the mineral development could provide a major boost to employment opportunities in this industry and could help to deliver major economic gains to Flintshire. It could also provide new skills-learning opportunities to local people. The sites are generally situated away from residential communities and thus community cohesion should be preserved. There is a risk that the expansion of these facilities could lead to an increase in the

energy consumption and emissions associated with each site, as well as the quality of natural waterbodies in proximity to the mineral resources.

Secondary, cumulative and synergistic effects

Throughout the IIA, when identifying and describing effects, where appropriate, this has included secondary, cumulative and synergistic effects. Cumulative (including synergistic and secondary) effects have been identified throughout the IIA Report, typically on a settlement wide basis followed by a county-wide basis. Secondary effects are understood as being indirect effects caused by a proposal in the LDP that occur away from the direct effect. Cumulative effects are the result of several proposals in-combination. Synergistic effects are the result of more than one proposal combining to have a greater effect than the sum of their parts.

Recommendations

Throughout the assessments of the LDP and its reasonable alternatives the IIA has made recommendations that would help to enhance positive effects and avoid or minimise adverse effects. These are typically in the form of minor rewording of policies to increase their scope or specificity, also often related to a strategic approach to an effective green infrastructure network.

A common thread running through these recommended measures is to develop a strategic approach to managing Flintshire's green infrastructure network to maximise its biodiversity and ecological connectivity value as well as the benefits it can provide in terms of enhancing landscape character, protecting soils, storing carbon and alleviating flood risk IIA Objectives whilst providing a safe and attractive walking and cycling route for residents (with subsequent benefits for health, transport and air quality).

Monitoring

Monitoring helps to ensure that any unforeseen and undesirable environmental effects are identified early on. A monitoring framework has been proposed in Chapter 8 of the IIA Report. It is designed to help monitor significant adverse effects identified for each IIA Objective, as well as some of the positive effects.

Monitoring is an ongoing process integral to the LDP's implementation and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the SA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

Next Steps

This Non-Technical Summary along with the IIA Report will be issued for consultation alongside the Deposit LDP to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, Flintshire CC will review the feedback and revise the plan as appropriate for Submission to the Welsh Government for independent examination.

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

developmentplans@flintshire.gov.uk or
Andrew Farrow
Chief Officer (Planning and Environment)
Flintshire County Council
County Hall
Mold
Flintshire
CH7 6NF

1. Introduction

1.1 Purpose of the Integrated Impact Assessment (IIA) Report

Flintshire County Council (CC) ('the Council') is currently preparing its new Local Development Plan (LDP) and, following a review of preferred options, has prepared the Deposit LDP (September 2019). This Integrated Impact Assessment (IIA) report has been prepared by Arcadis Consulting (UK) Ltd. (formerly Hyder Consulting (UK) Ltd.) on behalf of Flintshire CC. This IIA incorporates the requirements of a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), as well as Welsh Language Impact Assessment, Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). Findings in this report are up to date with the latest findings from the Habitat Regulations Assessment (HRA) of the LDP.

As a Planning Authority, the Council has a duty to prepare an LDP that sets out its strategy for development in Flintshire, including the policies to be used to direct development to the most sustainable locations and determine applications for planning permission. The purpose of this IIA Report is to document the IIA process that has accompanied the preparation of the LDP.

1.2 The LDP

Once adopted, the LDP will replace the existing Flintshire Unitary Development Plan (UDP)¹ and will become the framework against which land use planning decisions will be made across the County up to the year 2030. It will shape Flintshire's future physically and environmentally as well as influence it economically and socially. It will respond to the varied needs of a growing population and economy by providing for new jobs, homes, infrastructure and community facilities in a way that ensures that the well-being of people is enhanced and the effects of development are sustainably managed.

The context is set by national legislation and planning guidance which requires local authorities in Wales to prepare and maintain a development plan that deals with the above challenges in accordance with the sustainable development duty embodied by the Well Being of Future Generations Act (2015)². The LDP embodies a positive and responsible approach to development in Flintshire and aims to create more high-quality sustainable places in both urban and rural settings. A sustainable place is one with sufficient social, economic and environmental infrastructure to meet the needs of its people whilst being resilient and adaptable in the face of future challenges.

1.3 Defining Sustainable Development – Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015, approved by the National Assembly in March 2015, seeks to directly place Wales on a sustainable path to improving our well-being. The Act requires that public bodies carry out sustainable development which is defined as:

"Sustainable development" means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

The Planning (Wales) Act 2015, Section 2, sets out the definition of sustainable development for the planning system and directly refers to the definition in the Well-being of Future Generations Act.

¹ Available online at: <http://www.cartogold.co.uk/flintshire/>

² Available online at: <https://futuregenerations.wales/about-us/future-generations-act/>

Sustainable Development

Rather than an end in itself, sustainable development is a way of doing things. The Act guides how public bodies should operate to achieve it. The Act provides for a shared purpose through seven well-being goals for Wales. These well-being goals are indivisible from each other and explain what is meant by the well-being of Wales.

Sustainable development is the process of improving well-being. That there are many things that determine a person's quality of life (their well-being) and these can all be broadly categorised as environmental, economic, social and cultural factors. These are captured in the well-being goals. This means that improving the quality of our environment, our economy, society and culture can improve the well-being of individuals and of Wales as a whole.

Importance of Integrating the Seven Well-being Goals into the IIA

The well-being goals (see Table 1-1) were integral to the preparation of the LDP and its accompanying IIA. The well-being goals have been used to inform the review of the evidence, identify issues and structure the assessments, including through incorporating the well-being goals into the IIA Framework during the Scoping stage (see Chapter 4).

The seven well-being goals are designed to be generational. The initial well-being objectives of the Government cover the period 2016-2021 but reflect the Government's aspirations for change over the long term. The Government is committed to reviewing these and this will need to be considered as the IIA and LDP develop.

Table 1-1: Definition of Well-being of Future Generations Act Goals

Goal	Description of the goal
A prosperous Wales.	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
A resilient Wales.	A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
A healthier Wales.	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
A more equal Wales.	A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
A Wales of cohesive communities.	Attractive, viable, safe and well-connected communities.
A Wales of vibrant culture and thriving Welsh language.	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
A globally responsible Wales.	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

Ways of Working

The sustainable development principle defined by the Act is a fundamental part of how public bodies must now operate. Public bodies must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs, by taking account of the sustainable development principle.

The principle is made up of five ways of working that public bodies are required to take into account when applying sustainable development. These are:

- Looking to the **long-term** so that we do not compromise the ability of future generations to meet their own needs;
- Taking an **integrated** approach so that public bodies look at all the well-being goals in deciding on their well-being objectives;
- **Involving** a diversity of the population in the decisions that affect them;
- Working with others in a **collaborative** way to find shared sustainable solutions;
- Understanding the root causes of issues to **prevent** them from occurring.

The seven well-being goals and five ways of working provided by the Act are summarised in Figure 1-3. Each of the goals are described in detail within the legislation. The LDP will have an important role in contributing to the achievement of well-being goals over the 15-year period in Flintshire, and the approach to appraisal will help us understand where the LDP can maximise that contribution.

Figure 1-3: Well-being goals & 5 Ways of Working



1.4 Sustainability Appraisal and Strategic Environmental Assessment

SA is a process for assessing the social, economic, and environmental effects of a plan and aims to ensure that sustainable development is at the heart of the plan-making process.

It is a legal requirement that LDPs are subject to SA, under the Planning and Compulsory Purchase Act 2004³ (Chapter 7). This Act stipulates that the SA must comply with the requirements of the SEA Directive, which was transposed directly into UK law through the SEA Regulations.

SEA is a systemic process for evaluating the environmental consequences of plans and programmes to ensure that environmental issues are integrated and assessed at the earliest opportunity in the decision-making process. Article 1 of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive)⁴ states that the aim is to:

‘Provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.’

It is possible to combine the processes of SEA and SA, as they share a number of similarities. The IIA promotes a combined process (i.e. a process which assesses social, economic and environmental effects) and this is the approach that has been adopted here. Whilst there are formalised approaches for both SA and SEA, only SEA has a legal obligation to perform certain activities. These legal obligations have been and will continue to be adhered to throughout the IIA for the new LDP. As per the draft LDP manual⁵:

‘Local Authorities may wish to consider the value and opportunity for undertaking an Integrated Sustainability Assessment (ISA) including the statutory and key elements of the Well-being of Future Generations Act, Equalities Act, Welsh language and Health Impact Assessment. This will enable a more transparent, holistic and rounded assessment of the sustainability implications of the plan.’

1.5 Habitats Regulations Assessment

European Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna (the ‘Habitats Directive’)⁶ requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC) and Special Protection Area (SPA)), 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). In addition, it is a matter of law that candidate SACs (cSACs), Sites of Community Importance (SCI), Ramsar sites and potential SPAs (pSPAs) are also considered in this process.

An 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 Natura 2000 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. However, its findings will be relevant to the IIA and *vice versa* so the two processes will need to interact. The findings of the HRA screening exercise have been considered in this IIA Report where relevant. The HRA screening exercise, in the form of a Report, is submitted alongside this IIA and LDP.

1.6 Integrated Impact Assessment

³ Available online at: <https://www.legislation.gov.uk/ukpga/2004/5/contents>

⁴ Available online at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042>

⁵ Available online at: <https://gov.wales/sites/default/files/consultations/2019-06/development-consultation-document.pdf>

⁶ Available online at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>

The term Integrated Impact Assessment 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 is set out in Planning Policy Wales (Edition 10), December 2018⁷ (PPW), which recommends an integrated approach to assessing the effects of these strategies and incorporating the requirements of SEA, SA, Health Impact Assessment (HIA), and Equality Impact Assessment (EqIA). The Welsh Language and Children's Rights assessments, as well as those goals considered within the Well-being of Future Generations (Wales) Act 2015, have been reviewed against the IIA Framework to ensure such goals are captured.

This IIA therefore draws together the following impact assessments:

- Sustainability Appraisal (SA);
- Strategic Environmental Assessment (SEA);
- Habitats Regulations Assessment (HRA) (reported separately);
- Welsh Language;
- Equalities (EqIA); and
- Health (HIA).

Equalities Impact Assessment

Under the equality duty (set out in Section 149 of the Equality Act 2010), many public authorities must have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation as well as to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

Welsh Language Impact Assessment

PPW sets out (3.26) that *'planning authorities must consider the likely effects of their development plans on the use of the Welsh language as part of the Sustainability Appraisal.'*

The Welsh Language (Wales) Measure 2011⁸ requires the following effects to be considered:

- What effect, if any, the LDP would have on the opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language;
- How the LDP could have positive effects or increased positive effects on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language; and
- How the LDP could be developed so that it doesn't have any, or it reduces, adverse effects on opportunities for other persons to use the Welsh language whilst also ensuring the Welsh language is treated no less favourably than the English language.

Health Impact Assessment

HIA is not a statutory requirement in Wales but the Welsh Government increasingly regards it as best practice to consider health and well-being specifically in non-health domains. PPW sets out (3.24) that *'information to assess potential impacts on health can be required through various mechanisms, such as sustainability appraisals of development plans...'* It is a systematic, objective and yet flexible and practical way of assessing both the potential positive and negative effects of a proposal on health and well-being and suggests ways in which opportunities for health gain can be maximized and risks to

⁷ Available online at: <https://gov.wales/sites/default/files/publications/2019-02/planning-policy-wales-edition-10.pdf>

⁸ Available online at: <http://www.legislation.gov.uk/mwa/2011/1/contents/enacted>

health minimised. Importantly, HIA highlights the uneven way in which health effects may be distributed across a population and seeks to address existing health inequalities and inequities as well as avoid the creation of new ones.

1.7 Consultation

SA Workshop

A Scoping Workshop was held in January 2015. The IIA Objectives were developed using the review of other relevant plans, programmes and environmental protection objectives; the baseline data; key issue and opportunities; and feedback from the workshop. The objectives were assessed for their internal compatibility and no significant issues were identified.

Scoping Consultation

In accordance with regulation 12(5) of the SEA Regulations, the Scoping Report was consulted upon for a five-week period, commencing in September 2015. The statutory SEA bodies consulted were:

- Natural Resources Wales (NRW);
- Cadw; and
- The Welsh Government.

Additional Consultation

The Council consulted on key documents during 2016⁹ included:

- Key Messages Document – consulted on between 18 March and 29 April 2016 this identified the key messages emerging from an assessment of the relevant evidence and translated these into a draft vision and set of objectives. This document also presented options for reviewing the Sustainable Settlement Hierarchy;
- Draft LDP Strategic Options – consulted on between 28 October and 09 December 2016 this presented a range of options for how much development the Plan should make provision for, as well as options for different ways to distribute that growth around the County;
- Alongside the LDP Strategic Options consultation the Council consulted on the October 2016 Sustainability Appraisal of Strategic Options report.

The representations received during consultation on these documents were assessed and influenced the development of the Preferred Strategy. A summary of the representations received on the Key Messages document is available in the Key Messages section of the Council's website¹⁰ whilst the comments on the Strategic Options document is available in a separate Background Paper¹¹, as part of the consultation documents on the Preferred Strategy.

The IIA Framework was revisited in August 2017, to ensure that objectives around cohesive communities, the Welsh language, health, and equality took into account recent changes, as adopted by the Welsh Government. This framework was sent to statutory consultees for consultation.

Responses received from stakeholders during consultation were reviewed by the Council and taken into consideration during the next stage of the LDP process.

Preferred Strategy Consultation

⁹ All available online at: <https://www.flintshire.gov.uk/en/Resident/Planning/Flintshire-Local-Development-Plan.aspx>

¹⁰ Online at: <https://www.flintshire.gov.uk/en/Resident/Planning/Flintshire-Local-Development-Plan.aspx>

¹¹ Available online at: <https://www.flintshire.gov.uk/en/Resident/Planning/Preferred-Strategy-Pre-Deposit-Public-Consultation.aspx>

The IIA Report (October 2017)¹² accompanying the LDP Preferred Strategy was used as a consultation document and issued to statutory bodies and stakeholders for comments during the Preferred Strategy Pre-Deposit Public Consultation. This consultation took place between Thursday 9th November and Thursday 21st December 2017. All representations received were reviewed and analysed by the Council, which informed the preparation of the Deposit LDP (September 2019).

Deposit LDP (where we are now)

The Deposit LDP (September 2019) is the version of the LDP that the Council intend to submit for examination and then adopt. It provides a vision for the County up to the year 2030 and Objectives to achieve this Vision. It proposes quantities of development, a spatial distribution for delivering this development, broad as well as specific locations for development and policies for managing this. It also provides a monitoring framework as well as a map of proposals. Its aim is to guide not only the aspirations of the Council, but also other key service providers and stakeholders, as well as developers, whose collective response will be essential to the successful implementation of the LDP.

This report is the IIA Report to accompany the Deposit LDP (September 2019).

1.8 Quality Assurance Checklist

It is necessary for this IIA Report to satisfy the legal and best practice¹³ requirements of an 'environmental report' as per the SEA Directive. Table 1-2 sets out what these requirements are and where they have been fulfilled in this IIA Report.

Table 1-2: Quality assurance checklist for the SEA component of the IIA¹⁴

Requirement for SEA	Completed?
The plan's or programme's purpose and objectives are made clear	See Chapter 2
Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets	See Appendices B & C
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate	See IIA Framework
Links with other related plans, programmes and policies are identified and explained	See PPP Review
Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described	
Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.	See Section 1.9
The assessment focuses on significant issues	Yes
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	Yes
Reasons are given for eliminating issues from further consideration.	See SA Scoping Report ¹⁵
Realistic alternatives are considered for key issues, and the reasons for choosing them, or eliminating them, are documented	See Section 2.3
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant	Yes

¹² Available online at: <https://www.sirryfflint.gov.uk/cy/PDFFiles/Planning/Preferred-Strategy-Consultation/Integrated-Impact-Assessment-Main-Report.pdf>

¹³ Office of the Deputy Prime Minister, A Practical Guide to the Strategic Environmental Assessment Directive, September 2005. Available online at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidessea.pdf

¹⁴ Office of the Deputy Prime Minister, A Practical Guide to the Strategic Environmental Assessment Directive, September 2005. Available online at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidessea.pdf

¹⁵ The SA Scoping Report is available online at: <https://www.flintshire.gov.uk/en/Resident/Planning/Flintshire-Local-Development-Plan.aspx>

Requirement for SEA	Completed?
The environmental effects (both adverse and beneficial) of each alternative are identified and compared.	See Appendices D, E & F
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	Yes
Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.	See Appendix B
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.	See Appendix A
Difficulties such as deficiencies in information or methods are explained.	See Chapter 4 and Section 6.5
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate.	See Appendices C, D & E
Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.	See Appendices C, D & E
Likely secondary, cumulative and synergistic effects are identified where practicable.	See Chapter 6 & Appendix E
Inter-relationships between effects are considered where practicable.	See Appendices C, D & E
The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.	See Appendices C, D & E
Methods used to evaluate the effects are described.	See Chapter 4
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated	See Appendices C, D & E
Issues to be taken into account in project consents are identified.	See Section 6.2
Is clear and concise in its layout and presentation and uses simple, clear language and avoids or explains technical terms.	Yes
Uses maps and other illustrations where appropriate.	See Chapter 2
Explains who was consulted and what methods of consultation were used.	See Table 3.1
Identifies sources of information, including expert judgement and matters of opinion.	Yes
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	Yes, see the front of this report
The SEA is consulted on as an integral part of the plan-making process	See Table 3.1
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report	Yes
The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme and an explanation is given of how they have been taken into account.	See Table 3.1
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	See Section 2.3
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	See Chapter 7
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	Yes
Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)	Yes
Proposals are made for action in response to significant adverse effects.	Yes

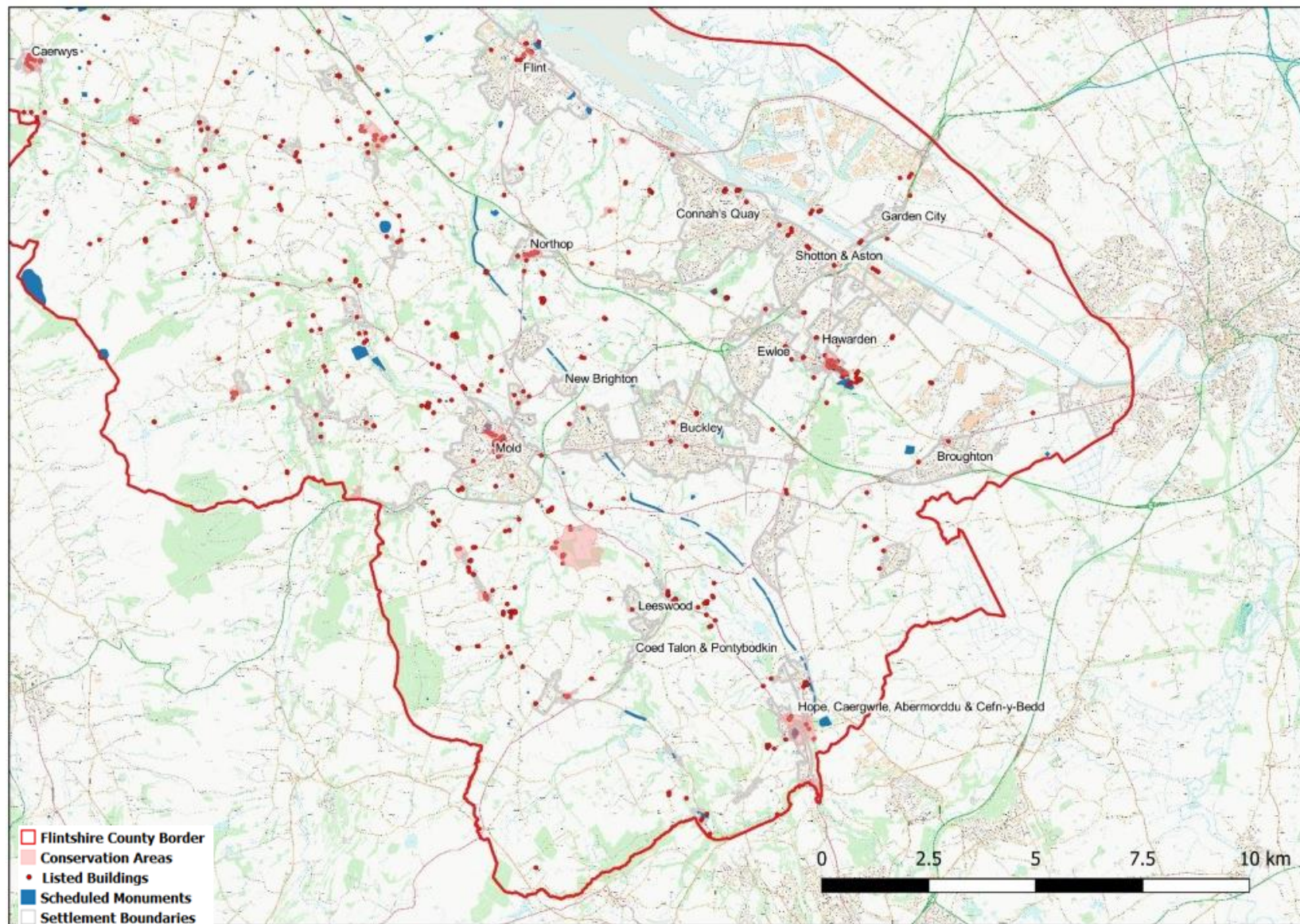
2. Flintshire and the LDP

2.1 Context of the LDP

Established in 1996, the County of Flintshire is situated in north-east Wales with Denbighshire to its west; Wrexham County Borough to its south; and the English county of Cheshire to its east. The Dee Estuary bounds it to the north. The population estimate for the 438 km² County in 2017 was 155,200, which, at 354 people per km², makes it the most densely populated area in North Wales. Many of these residents live in the larger settlements of Buckley, Connah's Quay, Shotton, Flint and Mold. The County is also home to large swathes of rural land, which contain distinct and sensitive landscapes containing large proportions heritage assets and important biodiversity. The manufacturing industry in Flintshire underpins the local economy, with major employers including Airbus, TATA Steelworks, Toyota and Shotton Paper, many of which are in Deeside Industrial Park near Connah's Quay. The A494 is an important trunk road for the County's residents, connecting Flintshire with cities like Chester, Liverpool and Warrington in the east. Spanning the County from north to south is the A55, which also provides a connection into Chester and onto the A-road network beyond.

Figures 2-1 and 2-2 provide an overview of the distribution of heritage assets in the county. Figures 2-3 and 2-4 provide an overview of biodiversity designations, whilst Figures 2-5 and 2-6 display the distribution of GP surgeries (including their sub-branches), hospitals and urban greenspaces. Fluvial flood risk is presented in Figures 2.7 and 2.8.

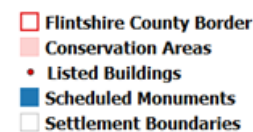
Figure 2-1: Cultural heritage assets, including Listed Buildings, Scheduled Monuments and Conservation Areas, in south Flintshire [Contains OS data © Crown copyright and



Flintshire Deposit LDP – IIA Report (Environmental Report)

database right (2018)]

Figure 2-2: Cultural heritage assets, including Listed Buildings, Scheduled Monuments and Conservation Areas, in north Flintshire [Contains OS data © Crown copyright and



database right (2018)]

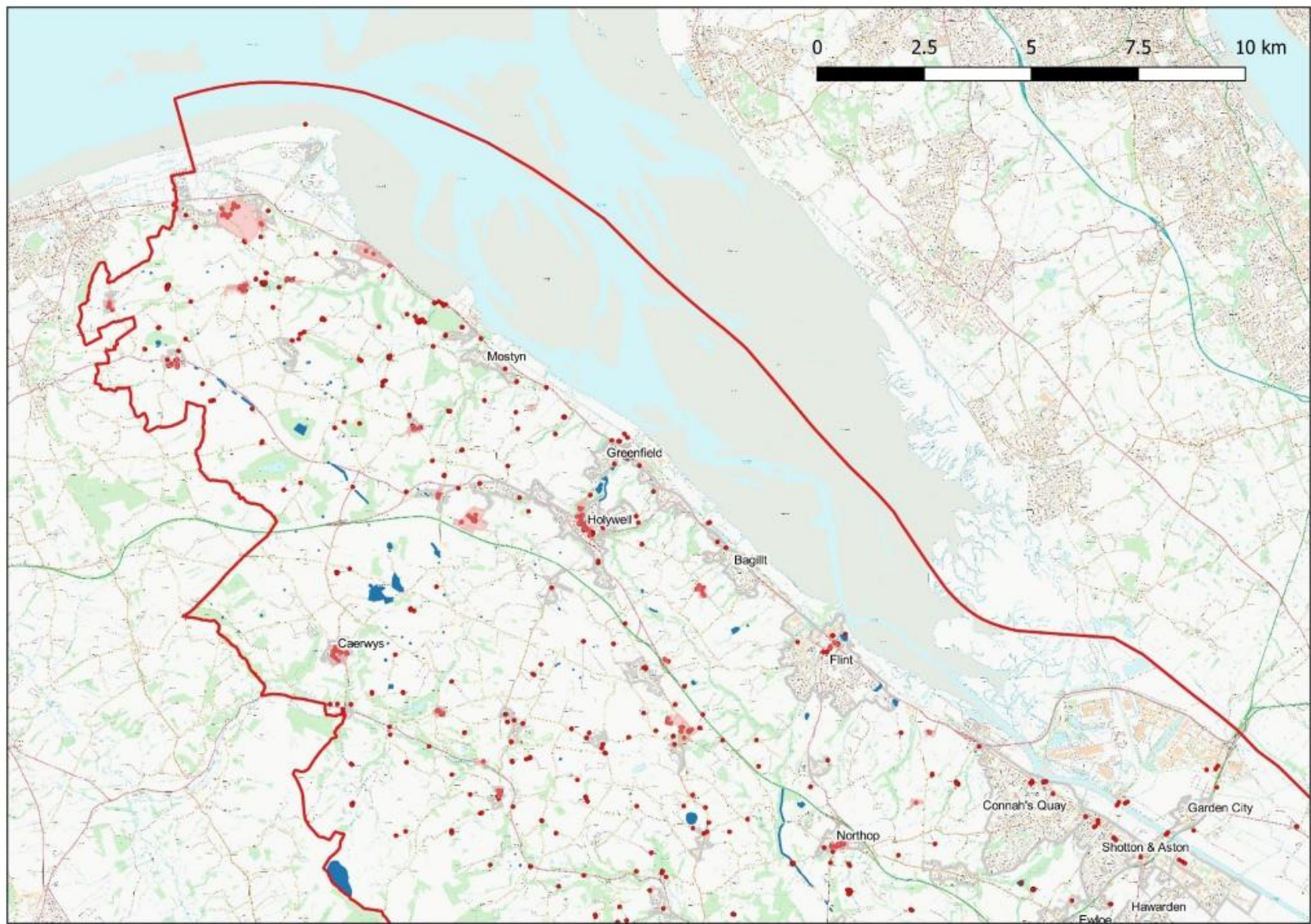


Figure 2-3: Biodiversity designations, including SACs, SPAs, SSSIs and Ancient Woodland, in south Flintshire. Local Wildlife Sites not included. [Contains OS data © Crown copyright and database right (2018)]

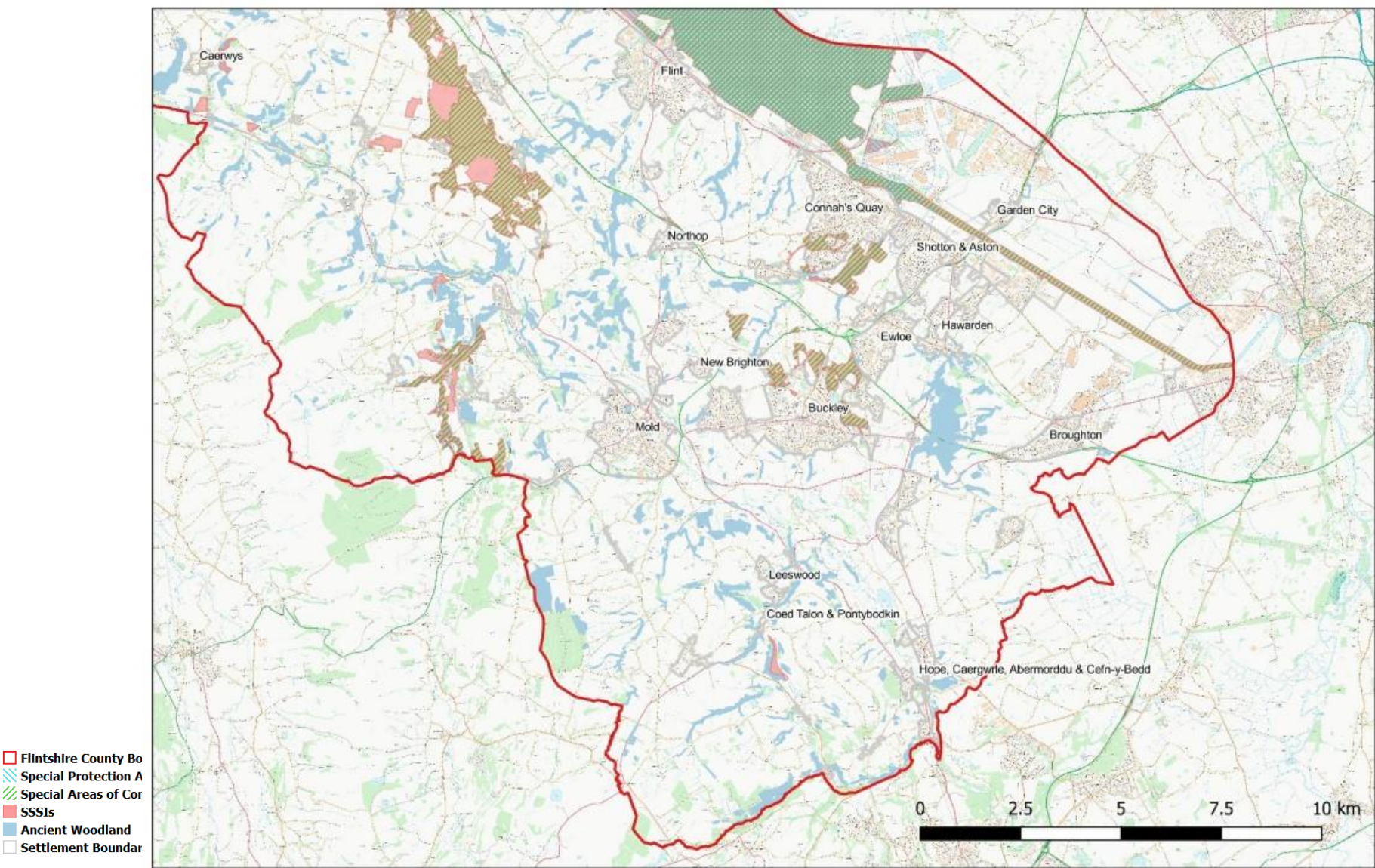


Figure 2-4: Biodiversity designations, including SACs, SPAs, SSSIs and Ancient Woodland, in north Flintshire. Local Wildlife Sites not included. [Contains OS data © Crown copyright and database right (2018)]

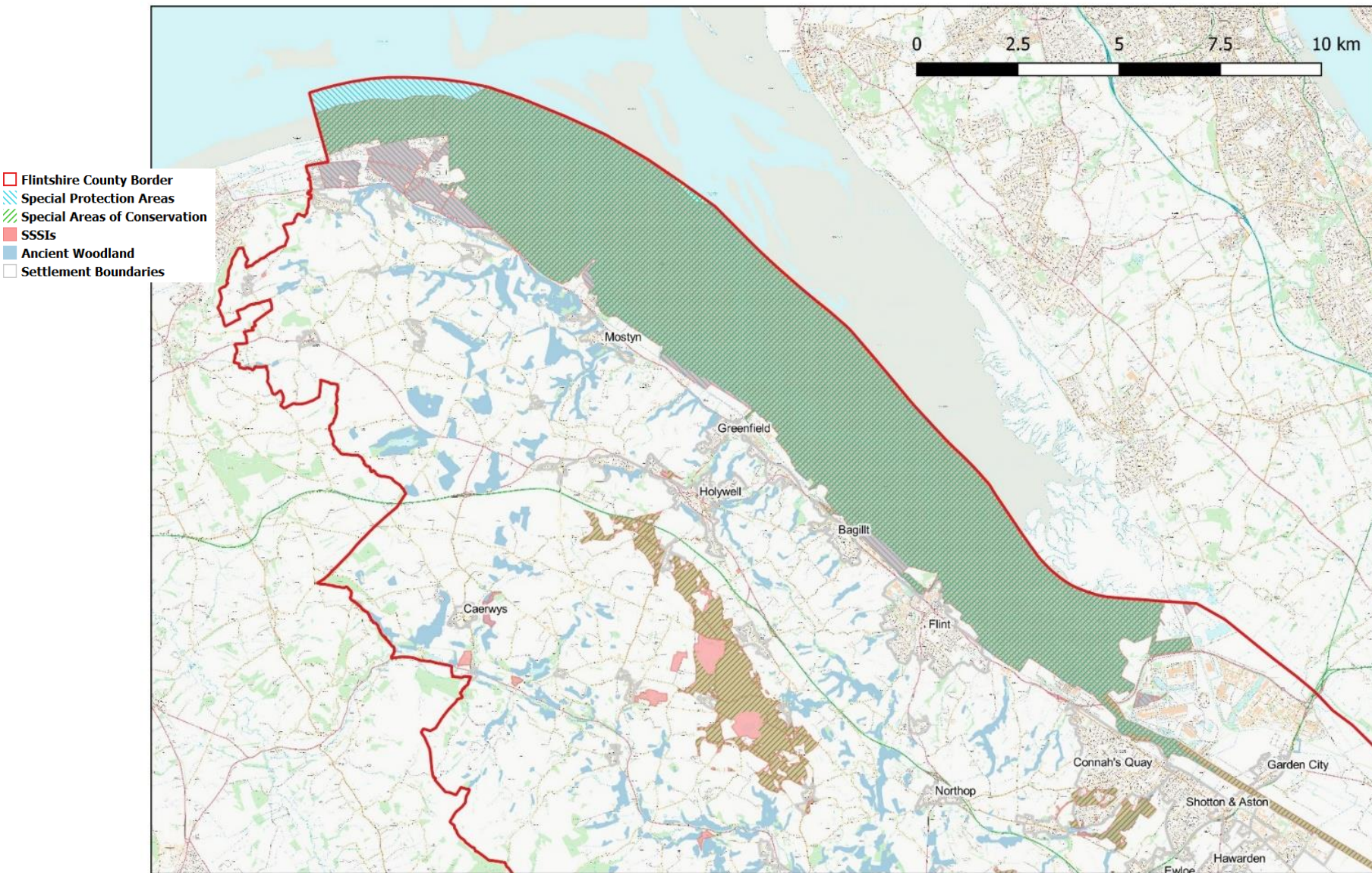


Figure 2-5: Distribution of health services in south Flintshire [Contains OS data © Crown copyright and database right (2018)].

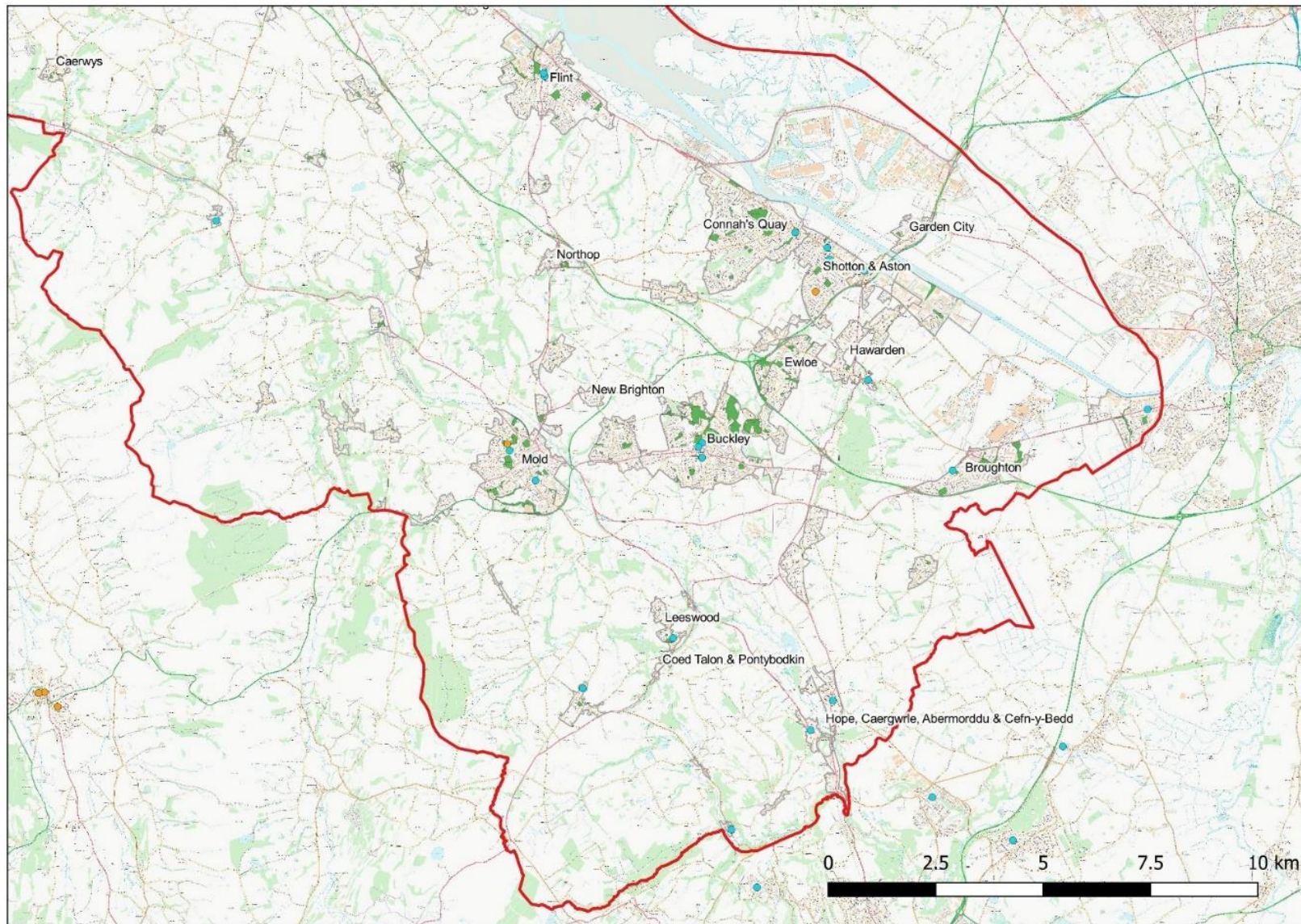


Figure 2-6: Distribution of health services in north Flintshire [Contains OS data © Crown copyright and database right (2018)].

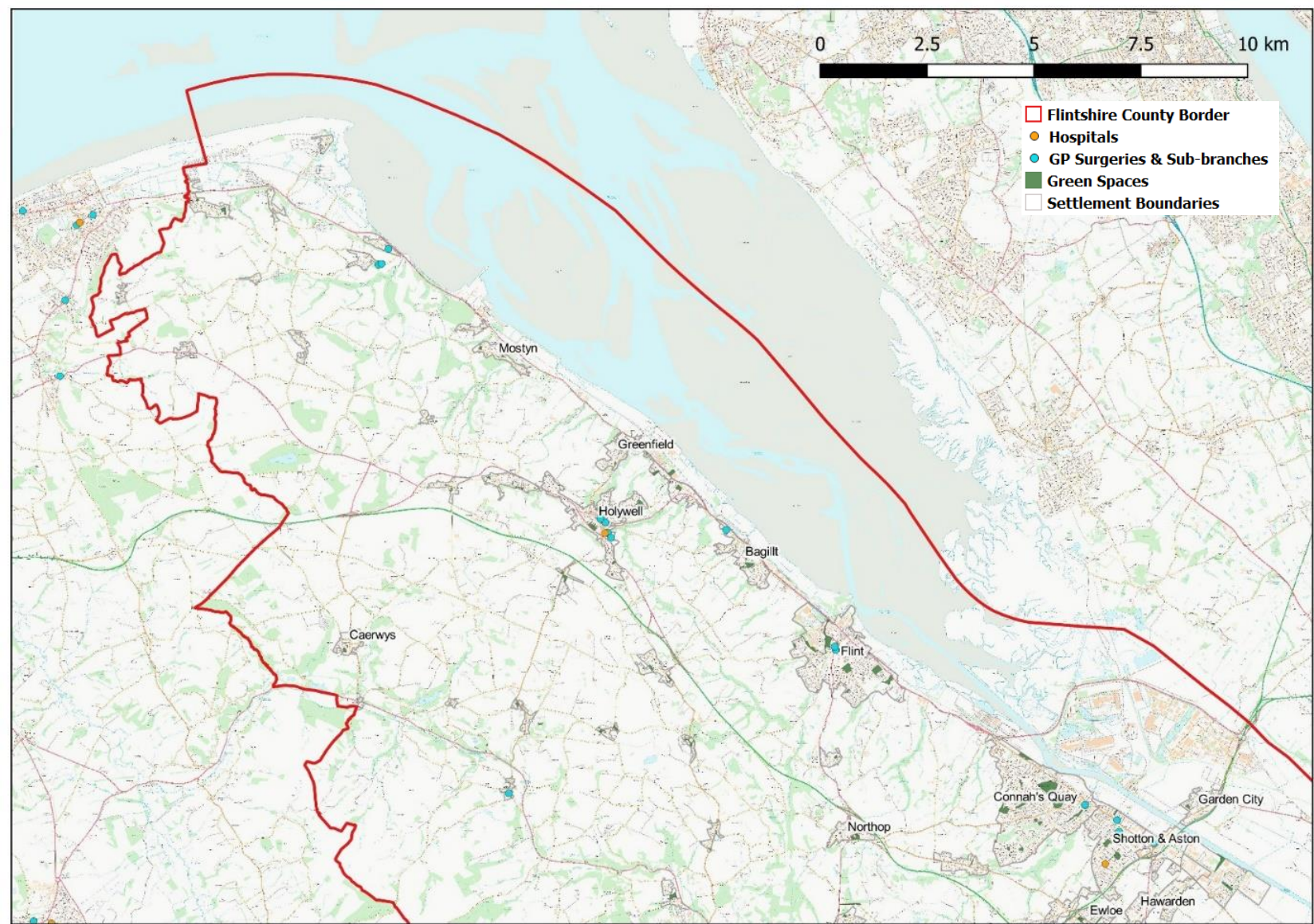
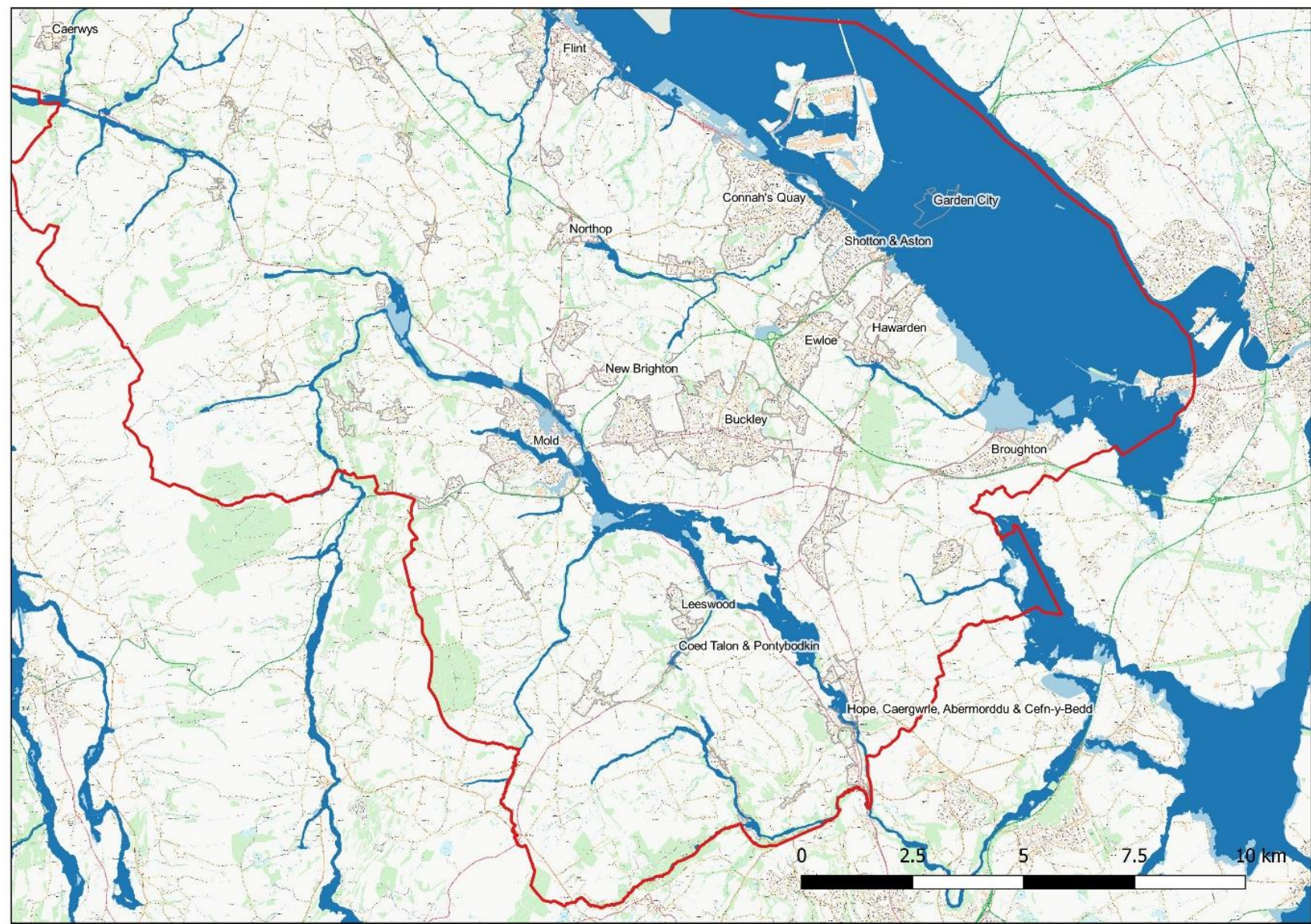


Figure 2-7: Fluvial flood risk in south Flintshire [Contains OS data © Crown copyright and database right (2018)].



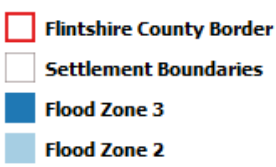
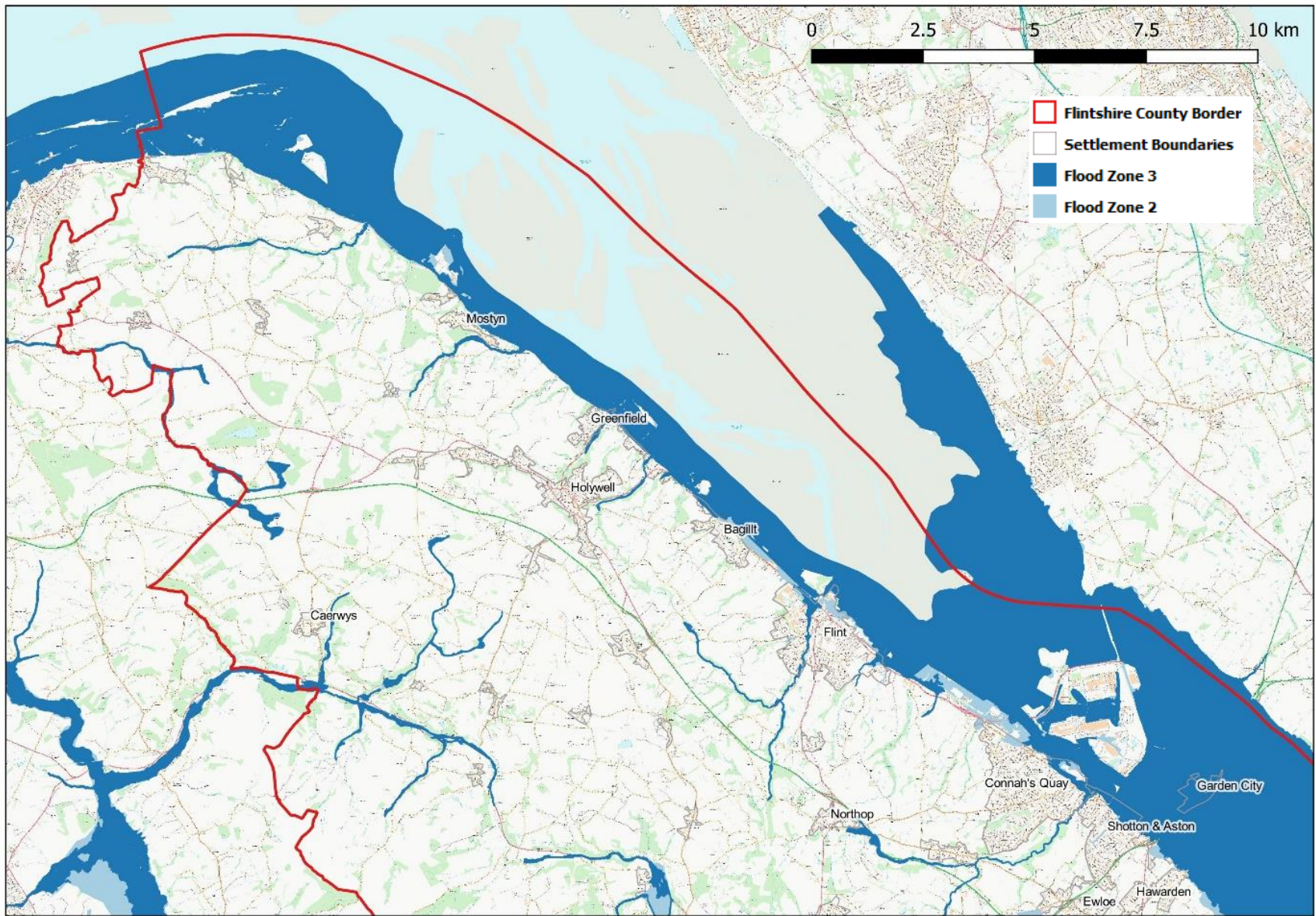


Figure 2-8: Fluvial flood risk in north Flintshire [Contains OS data © Crown copyright and database right (2018)].



2.2 The LDP Process

Figure 2-9 provides an overview of a typical preparation process for an LDP with an accompanying IIA, as per the Welsh Government's 2015 Local Development Plan Manual¹⁶. As set out under 'consultation', the LDP is currently at the Deposit Plan stage.

2.3 Development of the Deposit LDP

The Vision, Narrative, Objectives, Strategic Policies, Development Management Policies and Site Allocations proposed in the Deposit LDP (September 2019) have been developed following a thorough process over several years conducted by the Council. This has included several rounds of consultation with the public and interested bodies, from which 'Key Messages' were derived. Taking into account the LDP's strategic context, the growth ambitions in the sub-region and key issues in Flintshire, the LDP has been prepared to help ensure that land use is managed in a sensible and socially, economically and environmentally sustainable manner. The preparation of the Deposit LDP (September 2019) has also been informed by other evidence bases at local, regional and national levels as well as the 18 Topic Papers prepared by the Council and consulted on in 2015¹⁷.

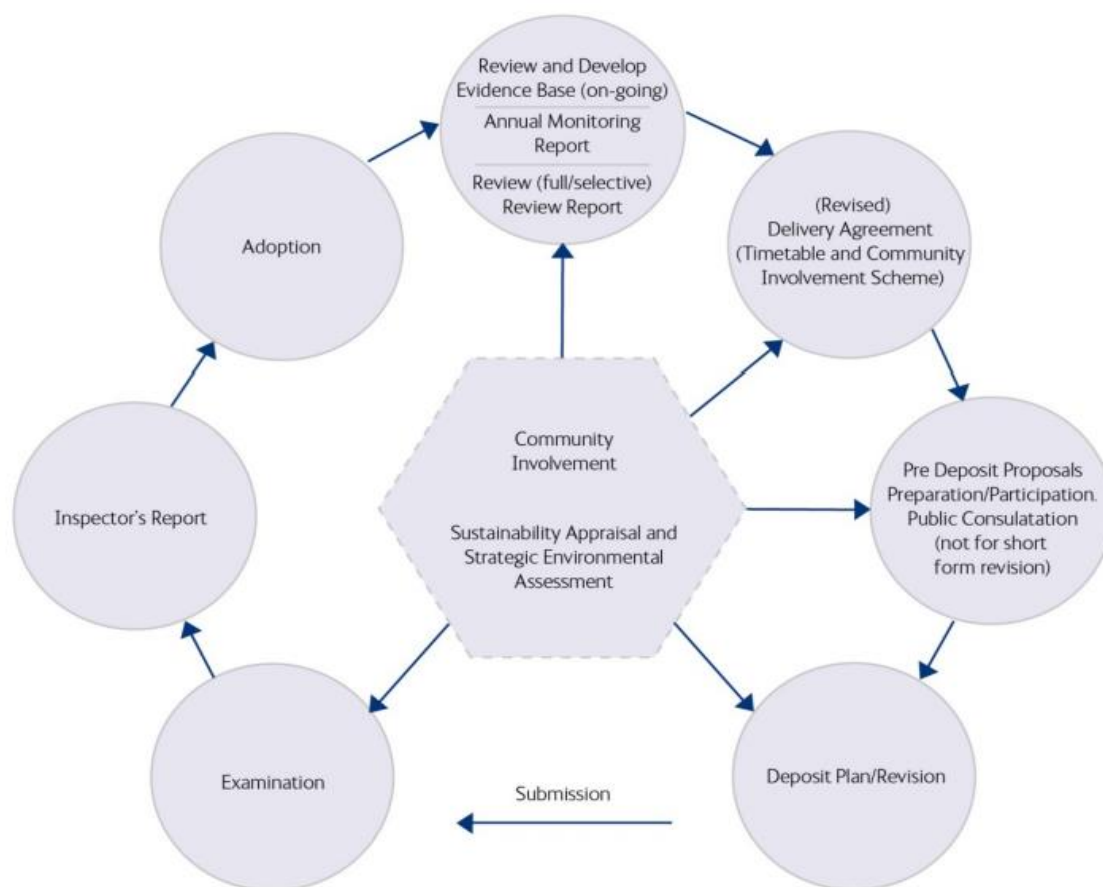
During the preparation of the Deposit LDP (September 2019), the Council have considered various options for the quantity of growth to deliver, the overarching distribution strategy for this development in Flintshire and specific locations for different types of development. Each has been assessed during the IIA process and this has helped to inform the Council of the likely sustainability effects of different options. The IIA has also made recommendations for avoiding or mitigating adverse sustainability effects, and enhancing positive sustainability effects, and these have been considered by the Council during the preparation of the LDP.

After identifying a Vision and Objectives for the LDP, the Council sought to develop Strategic Options and Policies that would help to achieve these. The sites they have sought to allocate for various types of development are locations that would also contribute towards achieving the LDP's Vision and Objectives whilst according with the required level of growth and desired Spatial Strategy. Each site also needs to be available, achievable and sustainable as possible. The Council has prepared a justification for the proposed residential site allocations, on a site by site basis, in light of the reasonable alternatives dealt with. This is presented in the Background Paper 8: Assessment of Candidate and Alternative Sites document, which provides a detail overview of why and how sites have been allocated in light of the options available to the Council.

¹⁶ Source: Welsh Government, 2015, Local Development Plan Manual, Edition 2, August 2015
<https://gov.wales/docs/desh/publications/151007local-development-plan-manual-edition-2-en.pdf>

¹⁷ Topic Papers available online at: <https://www.flintshire.gov.uk/en/Resident/Planning/LDP-topic-papers.aspx>

Figure 2-9: A typical LDP preparation process (LDP manual)



2.4 Contents of the Deposit LDP

The Deposit LDP (September 2019) includes the following sections:

- Policy index;
- Forward;
- Introduction;
- Strategic Policies;
 - Creating Sustainable Places and Communities;
 - Supporting a Prosperous Economy;
 - Meeting Housing Needs;
 - Valuing the Environment;
- Development Management Policies;
 - Creating Sustainable Places and Communities;
 - Supporting a Prosperous Economy;
 - Meeting Housing Needs;
 - Valuing the Environment;
- Monitoring;
- Appendices; and

- Technical Terms and Glossary.

The LDP (September 2019) sets out the following Vision for Flintshire:

“The LDP is about people and places. It seeks to achieve a sustainable and lasting balance which provides for the economic, social, and environmental needs of Flintshire and its residents, through realising its unique position as a regional gateway and area for economic investment, whilst protecting its strong historic and cultural heritage”

In order to achieve the Vision, the LDP sets out 19 LDP Objectives across three themes:

Enhancing Community Life:

1. Ensure communities have access to a mix of services and facilities, such as education and health, to allow community life to flourish, and meet the needs of particular groups such as the elderly;
2. Encourage the development of town and district centres as the focus for regeneration;
3. Promote a sustainable and safe transport system that reduces reliance on the car;
4. Facilitate the provision of necessary transport, utility and social / community infrastructure;
5. Facilitate the sustainable management of waste;
6. Protecting and supporting the Welsh Language; and
7. Create places that are safe, accessible and encourage and support good health, well-being and equality.

Delivering Growth and Prosperity:

8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors;
9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region;
10. Redefine the role and function of Flintshire’s town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport;
11. Ensuring that Flintshire has the right amount, size, and type of new housing to support economic development and to meet a range of housing needs;
12. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure;
13. Promote and enhance a diverse and sustainable rural economy; and
14. Support the provision of sustainable tourism development.

Safeguarding the Environment:

15. Minimise the causes and impacts of climate change and pollution;
16. Conserve and enhance Flintshire’s high-quality environmental assets including landscape, cultural heritage and natural and built environments;
17. Maintain and enhance green infrastructure networks;
18. Promote good design that is locally distinct, innovative and sensitive to location; and
19. Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land.

In order to achieve the 19 Objectives, the LDP sets out Strategic and Development Management Policies (see Table 2-1). These are divided across the following themes:

- Creating sustainable places and communities;
- Supporting a prosperous economy;
- Meeting housing needs; and
- Valuing the environment.

Within the policies are various site allocations, including sites allocated for future residential or employment development. These are listed in Table 2-2.

Table 2-1: Strategic and Development Management Policies in the LDP

Policy
Strategic Policies
Creating Sustainable Places and Communities
Policy STR1: Strategic Growth
Policy STR2: The Location of Development
Policy STR3: Strategic Sites
Policy STR4: Principles of Sustainable Development, Design and Placemaking
Policy STR5: Transport and Accessibility
Policy STR6: Services, Facilities and Infrastructure
Supporting a Prosperous Economy
Policy STR7: Economic Development, Enterprise and Employment
Policy STR8: Employment Land Provision
Policy STR9: Retail Centres and Development
Policy STR10: Tourism, Culture, and Leisure
Meeting Housing Needs
Policy STR11: Provision of Sustainable Housing Sites
Policy STR12: Provision for Gypsies and Travellers
Valuing the Environment
Policy STR13: Natural and Built Environment, Green Networks and Infrastructure
Policy STR14: Climate Change and Environmental Protection
Policy STR15: Waste Management
Policy STR16: Strategic Planning for Minerals
Development Management Policies
Creating Sustainable Places and Communities
Policy PC1: The Relationship of Development to Settlement Boundaries
Policy PC2: General Requirements for Development
Policy PC3: Design
Policy PC4: Sustainability and Resilience of New Development
Policy PC5: Transport and Accessibility
Policy PC6: Active Travel
Policy PC7: Passenger Transport
Policy PC8: Airport Safeguarding Zone
Policy PC9: Protection of Disused Railway Lines
Policy PC10: New Transport Schemes
Policy PC11: Mostyn Docks
Policy PC12: Community Facilities
Supporting a Prosperous Economy
Policy PE1: General Employment Land Allocations
Policy PE2: Principal Employment Areas
Policy PE3: Employment Development Outside Allocated Sites and Principal Employment Areas
Policy PE4: Farm Diversification
Policy PE5: Expansion of Existing Employment Uses
Policy PE6: Protection of Employment Land
Policy PE7: Retail Hierarchy
Policy PE8: Development within Primary Shopping Areas
Policy PE9: Development outside Primary Shopping Areas
Policy PE10: District and Local Centres
Policy PE11: Edge and Out of Town Retail Development
Policy PE12: Tourist Accommodation, Facilities and Attractions
Policy PE13: Caravan Development in the Open Countryside
Policy PE14: Greenfield Valley
Meeting Housing Needs
Policy HN1: New Housing Development Proposals
Policy HN2: Density and Mix of Development

Policy
Policy HN3: Affordable Housing
Policy HN4: Housing in the Countryside
Policy HN4-A: Replacement Dwellings
Policy HN4-B: Residential Conversion of Rural Buildings
Policy HN4-C: Infill Development in Groups of Houses
Policy HN4-D: Affordable Housing Exceptions Schemes
Policy HN5: House Extensions and Alterations
Policy HN6: Annex Accommodation
Policy HN7: Houses in Multiple Occupation
Policy HN8: Gypsy and Traveller Sites
Policy HN9: Gypsy and Traveller Accommodation
Valuing the Environment
Policy EN1: Sports, Recreation and Cultural Facilities
Policy EN2: Green Infrastructure
Policy EN3: Undeveloped Coast and Dee Estuary Corridor
Policy EN4: Landscape Character
Policy EN5: Area of Outstanding Natural Beauty
Policy EN6: Sites of Biodiversity Importance
Policy EN7: Development Affecting Trees, Woodland and Hedgerows
Policy EN8: Built Historic Environment and Listed Buildings
Policy EN9: Development in or Adjacent to Conservation Areas
Policy EN10: Buildings of Local Interest
Policy EN11: Green Barriers
Policy EN12: New Development and Renewable and Low Carbon Energy Technology
Policy EN13: Renewable and Low Carbon Energy Development
Policy EN14: Flood Risk
Policy EN15: Water Resources
Policy EN16: Development on or near Landfill Sites or Derelict and Contaminated Land
Policy EN17: Development of Unstable Land
Policy EN18: Pollution and Nuisance
Policy EN19: Managing Waste Sustainably
Policy EN20: Landfill Buffer Zone
Policy EN21: Locations for Waste Management Facilities
Policy EN22: Criteria for Waste Management Facilities and Operations
Policy EN23: Minerals Safeguarding
Policy EN24: Minerals Buffer Zones
Policy EN25: Sustainable Minerals Development
Policy EN26: Criteria for Minerals Development
Policy EN27: Secondary and Recycled Aggregate

Table 2-2: LDP Site Allocations

Proposed land-use	LDP Policy	Location in Flintshire	Settlement
Community Facilities	PC12.3	Treuddyn Cemetery	Treuddyn
Community Facilities	PC12.1	Community Centre, Woodlane	Ewloe
Community Facilities	PC12.2	Greenfield Cemetery	Greenfield
Housing	H1.8	Ash Lane	Hawarden
Housing	H1.5	Maes Gwern	Mold
Housing	H1.9	Wrexham Road	Hope, Caergwrle, Abermorddu & Cefn-y-Bedd
Housing	H1.1	Well Street	Buckley
Housing	H1.2	Broad Oak holding, Mold Road	Connah's Quay
Housing	H1.3	Highmere Drive, Connah's Quay	Connah's Quay
Housing	H1.6	Land between Denbigh Road and Gwernaffield Road	Mold
Housing	H1.10	Cae Isa, A5119	New Brighton
Housing	H1.11	Chester Road	Penymynydd
Housing	H1.4	Northop Road	Flint
Housing	H1.7	Holywell Road / Green Lane	Ewloe
Gypsy and Traveller Sites	HN8.1	Magazine Lane	Ewloe
Gypsy and Traveller Sites	HN8.2	Gwern Lane	Caer Estyn
Gypsy and Traveller Sites	HN8.3	Riverside Park	Queensferry
Gypsy and Traveller Sites	HN8.4	Castle Park	Flint
Sustainable Minerals Development	EN25.1	Hendre Quarry	Hendre
Sustainable Minerals Development	EN25.2	Pant y Pwll Dwr Quarry	Pentre Halkyn
Sustainable Minerals Development	EN25.3	Ddol Uchaf Quarry	Afonwen
Sustainable Minerals Development	EN25.4	Fron Haul Quarry	Afonwen
Employment	PE1.5	Greenfield Business Park Phase III	Greenfield
Employment	PE1.10	Antelope Industrial Estate	Rhydymwyn
Employment	PE1.1	Manor Lane, Chester Aerospace Park	Broughton
Employment	PE1.8	Adjacent Mostyn Docks	Mostyn
Employment	PE1.6	Broncoed Industrial Estate	Mold
Employment	PE1.9	Chester Road East	Queensferry
Employment	PE1.3	Drury New Road	Buckley
Employment	PE1.4	Greenfield Business Park Phase II	Greenfield
Employment	PE1.11	River Lane	Saltney
Employment	PE1.12	Rowley's Drive	Shotton
Employment	PE1.7	Mold Business Park	Mold
Employment	PE1.2	Manor Lane, Hawarden Park Extension	Broughton
Mixed use strategic site	STR3A	Northern Gateway Mixed Use Development Site	Garden City
Mixed use strategic site	STR3B	Warren Hall Mixed Use Development Site	Broughton
Solar Farms	EN13.1	Crump's Yard, Dock Road	Connah's Quay
Solar Farms	EN13.2	Castle Park	Flint

3. The IIA Process

3.1 Stages in the IIA Process

The Wales Local Development Plan Manual (2015), as well as the ODPM's A Practical Guide to the SEA Directive (2005), provide guidance on conducting an SA/SEA. This will be followed for the purposes of the IIA. The five main stages in conducting an IIA are defined as:

- Stage A - setting the context and objectives, establishing the baseline and deciding on the scope;
- Stage B - developing and refining options and assessing effects;
- Stage C - preparing the Sustainability Appraisal Report;
- Stage D - consulting on the preferred option of the development plan and SA Report; and
- Stage E - monitoring significant effects of implementing the development plan.

Key stages in the SA process are presented in Table 3-1. This IIA Report documents the findings of Stages B up to the LDP Preparation and Deposit stage and comprises Stage C of the process. The table also demonstrates how each of the SA (including SEA), HIA, EqIA and HRA assessment processes and stages are linked to each other, as well as to the preparation and development of the Deposit LDP (September 2019).

Flintshire Deposit LDP – IIA Report (Environmental Report)

Table 3-1: Stages in the IIA Process

LDP Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in this IIA Report
Evidence Gathering and Objectives	A. Setting the context and objectives, establishing the baseline and deciding on the scope	Identify related plans/programmes	N/A	Identify health related plans/programmes (as part of IIA) linked into local Joint Strategic Needs Assessments	Review of relevant policies and strategies	Completed in 2015 and revisited in Appendix B
		Identify environmental protection objectives	N/A	Derivation of health - related themes	Derivation of equality-related themes	Completed in 2015 and revisited in Appendix A
		Baseline data and likely future trends	Identify all European sites within and up to 20km from the Flintshire area	Gather baseline data relating to health (as part of IIA)	Baseline data and likely future trends	
		Identify sustainability issues and opportunities	Contact NRW for details on European sites and consultation	Identify health issues and relevant determinants (as part of IIA)	Identify equalities specific issues	
		Develop objectives, indicators and targets (Assessment Framework)	Ensure IIA Framework covers European sites appropriately	Inclusion of health specific objectives, indicators and targets in IIA Framework	Ensure inclusion of equalities specific objectives, indicators and targets in IIA Framework	Completed in 2015 Scoping and August 2017 Re-Scoping
		Prepare IIA Scoping Report, incorporating HRA and HIA	HRA information incorporated into IIA Scoping Report	HIA information incorporated in IIA Scoping Report.	EqIA information incorporated in IIA Scoping Report.	
		Consult on the IIA Scoping Report, including HIA, EqIA and HRA (5 weeks)				
	Review of scoping consultation responses and preparation of Final Scoping Report to inform next stage.					
	Strategic Options and Preferred Strategy	B1/B2. Developing, refining and appraising strategic options, policy options and preferred policy options.	Assess objectives against the Assessment Framework	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework
Develop, refine and appraise strategic options			Consider HRA implications of the options.	N/A	N/A	
Evaluate/select preferred policy options			N/A	N/A	N/A	

Flintshire Deposit LDP – IIA Report (Environmental Report)

LDP Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in this IIA Report
	Prepare Initial IIA Report on Strategic Options					Completed in October 2017
	Consultation on Initial IIA Report (non-statutory)					
	B3/B4. Assessing the effects of the Local Plan Preferred Strategy	Predict and assess effects of preferred options taken forward	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework	
		Proposed mitigation measures	N/A	N/A	N/A	
		Propose monitoring programme	Monitoring as part of IIA			
	Prepare Further Interim IIA Report on Preferred Options					
	B3/B4. Assessing the effects of the Deposit Local Plan including detailed policies and allocations	Predict and assess effects of preferred options taken forward	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework	Completed in this report
		Proposed mitigation measures	N/A	N/A	N/A	
		Propose monitoring programme	Monitoring as part of IIA			
	LDP Preparation and Deposit	C. Prepare IIA Report		HRA Screening Report produced separately.	HIA documented in appropriate IIA Objectives in IIA Report	
D. Consultation on the IIA Report		Screening consulted on with NRW.	Included in IIA Consultation.			
D. Prepare a supplementary or revised IIA Report if necessary		Assess significant changes	Prepare updated HRA Report following consultation.	HIA of significant changes undertaken (as part of IIA).	EqIA of significant changes undertaken (as part of IIA).	
		Prepare supplementary or revised IIA Report				
Submission Examination and Adoption	D. Adoption Statement					

4. Stage A: Defining the Scope

4.1 Spatial and temporal scope

The IIA takes into consideration transboundary effects in areas adjacent to Flintshire, as well as effects within the county itself. The LDP sets out policies for the period to 2030. This has been used as the temporal scale for the IIA although effects that may last beyond this period will also be identified. This will help to identify whether effects are likely to be permanent (i.e. irreversible at least through the lifetime of the proposed measure/scheme) or temporary.

4.2 SEA Scope

The SEA Directive and the SEA Regulations require that the 'likely significant' effects on the environment are assessed, considering the following topics and interrelationship between them:

- Population;
- Biodiversity;
- Human health;
- Fauna and flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage; and
- Landscape.

Appendix B contains the environmental baseline for Flintshire used to inform the IIA. The baseline data was identified, gathered and analysed during the Scoping stage in 2015. It includes the following headings:

- Population;
- Education;
- Biodiversity, Flora and Fauna;
- Landscape;
- Soils and Geology;
- Water;
- Air Quality and Climate Change;
- Cultural Heritage;
- Minerals and Waste;
- Human Health;
- Local Economy;
- Housing;
- Deprivation and the Living Environment;
- Transportation; and
- Welsh Language.

The SEA Directive requires 'material assets' to be considered. Material assets refer to the stock of valuable assets within a study area and can include many things from valuable landscapes, natural and cultural heritage through to housing stock, schools, hospitals and quality agricultural land. It is

considered that the material assets of the area are appropriately covered as a component of multiple sections and consequently will not be repeated as a separate section.

4.3 HIA Scope

The HIA elements of the IIA assess the LDP in terms of its effects on the health of the local community, with wider effects being considered where relevant. This might include communities in the surrounding area, incoming residents and people coming in for work, visiting or just travelling through. There will be work developed around mitigating issues that impact negatively on health (including physical, mental and emotional).

Within the assessment process, the HIA has been integrated throughout the IIA Framework, with health, and impact on health, being considered under all relevant objectives. Most notably, however, the 'human health' topic of SEA will be expanded upon, to ensure that relevant baseline data, key sustainability issues and opportunities, objectives and mitigation are identified. Table 3-1 provides further information on how the HIA process has integrated with the IIA process.

4.4 EqIA Scope

The EqIA process is designed to ensure that projects, policies and practices do not discriminate or disadvantage people and also to enable consideration of how equality can be improved or promoted. The EqIA will consider the impact of a proposal on relevant groups who share characteristics which are protected under the Equality Act (age, disability, race, faith, gender (including gender reassignment), sexual orientation, pregnancy and maternity, marriage and civil partnership) as well as others considered to be vulnerable within society such as low-income groups.

This IIA Report, which integrates the requirements of EqIA, set out the matters that have been identified as relevant for consideration in the EqIA. The EqIA seeks to identify those groups that may be affected by the proposals, to analyse what the equality impacts are, and what measures are to be applied to policy to minimise or eliminate the adverse effects. Within the assessment process, the EqIA will be integrated throughout the IIA Framework, with equalities issues being considered under all relevant objectives. Table 3-1 provides further information on how the EqIA process has integrated with the IIA process.

4.5 HRA Scope

Within Flintshire there are eight sites of international nature importance, listed in Table 4-1 and a further 15 sites within 20km of the County, listed in Table 4-2. 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 Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process is documented in the HRA Screening Report that will be submitted to NRW for approval. This is a parallel process to the IIA process and has been reported separately. The HRA has ruled out a likely significant effect of the LPD on the conservation status of any European designation.

Table 4-1: Statutory sites of international nature importance within Flintshire

Name of Site	I.D No.	Distance from Flintshire
The Dee Estuary Ramsar site (England and Wales)	UK11082	Within the County boundary
Dee Estuary / Aber Dyfrdwy SAC	UK0030131	Within the County boundary
The Dee Estuary SPA (England and Wales)	UK9013011	Within the County boundary
Liverpool Bay / Bae Lerpwl (England and Wales) SPA	UK9020294	Within the County boundary
Deeside and Buckley Newt sites SAC	UK0030132	Within the County boundary
Alyn Valley Woods / Coedwigoedd Dyffryn Alun SAC	UK0030078	Within the County boundary
Halkyn Mountain / Mynydd Helygain SAC	UK0030163	Within the County boundary
River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (England and Wales) SAC	UK0030252	Within the County boundary

Table 4-2: Statutory sites of international nature importance within 20km of Flintshire boundary

Name of Site	I.D No.	Distance from Flintshire
Mersey Estuary Ramsar site	UK11041	9 km northeast
Mersey Estuary SPA	UK9005131	9 km northeast
Mersey Narrows & North Wirral Foreshore Ramsar site	UK11042	14 km northeast
Mersey Narrows & North Wirral Foreshore SPA	UK9020287	14 km northeast
Ribble & Alt Estuaries Ramsar Site	UK11057	20 km north
Ribble & Alt Estuaries SPA	UK9005103	20 km north
Midland Meres & Mosses Phase 2 Ramsar site	UK11080	5 km southeast
Midland Meres & Mosses - Phase 1 Ramsar site	UK11043	20 km southeast
Oak Mere SAC	UK0012970	18 km east
Sefton Coast SAC	UK0013076	19 km north
Coedwigoedd Dyffryn Elwy / Elwy Valley Woods	UK0030146	7 km west
Johnstown Newt Sites SAC	UK0030173	7 km south
Llwyn SAC	UK0030185	5 km west
Berwyn a Mynyddoedd De Clwyd / Berwyn and South Clwyd Mountains SAC	UK0012926	Adjacent
Berwyn SPA	UK9013111	14 km southwest

4.6 Review of Relevant Plans, Programmes and Environmental Protection Objectives

‘an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmers’ (SEA Directive, Annex 1 (a)).

‘the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation’ (SEA Directive, Annex 1 (e))

A review of other plans, programmes and environmental protection objectives that may affect the preparation of the LDP was undertaken during the IIA Scoping stage, in order to contribute to the development of both the IIA and the LDP. The review included documents prepared at international, national, regional and local scale. The results of the PPP review are presented in Appendix A. They include:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the IIA process.
- Identification of any baseline data relevant to the IIA.
- Identification of any external factors that might influence the preparation of the plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Local Plan.

- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Local Plan.

4.7 The Sustainability Baseline and Key Sustainability Issues

'the environmental characteristics of areas likely to be significantly affected' (SEA Directive, Annex 1 (c))

'any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EC' (SEA Directive, Annex 1 (d)).

Characterising the environmental and sustainability baseline, issues, opportunities and context is an essential part of developing the IIA Framework. It comprises the following key elements:

- Characterising the current state of the environment within Flintshire area, including social and economic aspects; and
- Using this information to identify existing problems and opportunities that could be considered in the Local Development Plan.

The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, regional and national plans, strategies and programmes;
- Data research based around a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape), Flintshire Draft LDP Preferred Strategy, and the data available for Flintshire and Wales. This encompassed data relating to HRA. Data was also collated for additional socio-economic topic areas relating to HIA and EqIA including deprivation, housing and employment to ensure that a broad range of environmental, social and economic issues were considered. The collation of baseline data enabled the identification of key sustainability issues and opportunities affecting the area; and
- The results of the Scoping Workshop held with stakeholders in January 2015.

The baseline and key sustainability issues are presented in Appendix B. This baseline has been updated, where necessary, for this report, in light of more up to date evidence bases becoming available. Following a careful review of this baseline, the key sustainability issues and opportunities for the county were identified. Briefly, these were based around the following topic areas:

- Pressures associated with an increasingly ageing population in Flintshire are likely to cause issues across the County;
- Opportunities to raise the number of working age Flintshire residents with good qualifications;
- Population and development pressure on protected and non-protected sites for nature conservation as well as habitat connectivity;
- The need for equitable access to green spaces;
- Potential pressure from development to valuable townscapes and landscape character;
- Legacy of lead mining leading to areas of residual land contamination;
- Need to preserve and enhance regionally important sites for geology;
- Increased threat from surface water flooding due to increased precipitation rates generated by climate change;
- Higher likelihood of coastal flooding as a result of rising sea levels due to climate change;
- Risks associated with flooding and the mobilisation of contaminants linked to contaminated land within the County;
- Opportunity to improve the potential for a reduction in the emission of greenhouse gases;
- Opportunity to improve the County's ability to adapt to the effects of climate change;

- Potential risks from development to designated and non-designated heritage assets and undiscovered archaeological remains throughout the County;
- Depletion of valuable mineral resources within the County and opportunities to safeguard assets for future generations;
- Opportunities to increase recycling, reuse and composting of waste which would otherwise be sent to landfill;
- There are pockets of health deprivation in the County;
- Poor levels of physical activity amongst the local population compared to recommended guidelines;
- Healthcare opportunities should be sought in order to reduce the increased mortality rate across Flintshire;
- There are pockets of employment deprivation across the County and there has been an increase unemployment and people claiming unemployment benefits;
- Opportunities should be sought to encourage inward investment to provide employment and business opportunities;
- There are pockets of housing deprivation in the County; a shortage of affordable housing; and a rising level of houses of multiple occupation;
- Opportunities should be sought to provide housing that meets local needs including the provision of affordable housing;
- There is a high percentage of areas within Flintshire that are experiencing deprivation in relation to the physical environment;
- Some of the town centres are showing a decline within the County;
- There is a need to build upon falling crime rates and reduce fear of crime;
- There is an opportunity to reduce inequalities across the County, including areas where there are high levels of deprivation amongst children;
- There is an increased dependence on travel by car and increasing usage of cars/vans to get to work and the distances travelled are increasing;
- There is concern in populated areas about transport and accessibility to key services including hospitals;
- There are a high number of deaths/serious injuries on Flintshire's roads compared to the national average;
- Opportunities should be sought to reduce car/van transport and increase the use of greener more sustainable modes of transport;
- Fluency in Welsh in Flintshire appears to be increasing, though the rate of rise in non-fluency is faster, suggesting an overall decline of Welsh speakers within the County; and
- Opportunities to increase exposure to the Welsh language should be sought.

4.8 Cross-boundary considerations

The County has a number of connections and links with other areas, such as Merseyside and Chester, and the surrounding counties within Wales. There are good links into and out of the County, which provide opportunities for inward investment, as well as enabling people in the County to have good access to job opportunities in other areas.

The '2013 Dee Region Cross-Border Economy: next steps' identifies that there is a strong cross-border functional economic region consisting of Wrexham, Chester, Deeside and Ellesmere Port. There is a fluid border in which trade occurs with little conscious consideration of the national boundary and similarly, travel patterns do not recognise the English/Welsh border, with 83% of all trips starting and finishing in the Dee sub-region. Large west - east commuter flows to the main employment centres in Deeside, Wrexham, Chester and Ellesmere Port exist. In practical terms, the cross border economic activity places considerable pressure on Flintshire's housing market; on infrastructure such as waste

facilities; and in terms of job creation (Flintshire is a net employer with a 4% unemployment rate compared to 4.8% average unemployment rate for Wales).

Whilst the economy is performing well, it is recognised that the daily outmigration of people from the County for employment purposes could be inhibiting the level of economic growth and personal spending in the County. There are also flows of workers travelling into Flintshire but there is a net flow out of the County. Indeed, the lack of a major urban centre within the County results in many people travelling to Chester for retail purposes. The County has vast tourism potential owing to its high-quality environment and the amount of tourism spending is considered to be increasing. The in-migration of people into the rural parts of the County could continue to create housing affordability problems.

4.9 The IIA Framework

The IIA Framework comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.

The IIA Objectives are separate from the objectives of the LDP, although there may be some overlaps between them. To help measure the performance of the LDP's components against the IIA Objectives, it is beneficial if they are supported by a series of indicators. Baseline data should be collated to support each of the indicators, as this provides a means of determining current performance across the Flintshire area and gauging how much intervention or the extent of work needed to achieve the targets that have been identified. The following section provides further details about the development of the IIA Framework.

The IIA Framework has been developed using the IIA Framework from the Scoping Report (2015) as a base. This was analysed and refined, using the following:

- Comparison against the updated PPPs and identified key sustainability issues and opportunities;
- Comparison against the SAs developed for neighbouring Local Plans;
- Findings from the Scoping Workshop;
- Consultation Comments on the Scoping Report (2015) and the Options Appraisal (2016); and
- Consideration of the Well-being of Future Generations (Wales) Act 2015 and the Rescoping Exercise of the IIA Framework carried out in August 2017.

The changes to the IIA Report included some additional indicators for numerous IIA Objectives, as well as two new IIA Objectives: IIA Objective 6: Community Cohesion; and IIA Objective 18: Welsh Language.

The IIA Framework used to assess the LDP is presented in Table 4-3. Each of the IIA Objectives is supported by a series of sub-objectives, to add further clarity and to assist the assessment process. The objectives are not mutually exclusive, and the assessment framework should be considered in its entirety. As such, the IIA Objectives are not presented in any particular order, with all Objectives being considered as having equal weighting.

IIA Objectives are also supported by indicators, which link to those used to describe the baseline conditions across the area. Where baseline data is not currently available, indicators have been suggested as to the type of information that may be appropriate. Throughout the course of the IIA, quantified targets have been identified to supplement this framework in liaison with Flintshire CC.

Table 4-3: IIA Framework

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
IIA Objective 1: To reduce crime, disorder and fear of crime					
<ul style="list-style-type: none"> To reduce levels of crime To reduce the fear of crime To reduce levels of anti-social behaviour To reduce burglary rates To encourage safety by design 	<ul style="list-style-type: none"> Crime rates per 1,000 of the population for key offences. Number and distribution of wards with LSOAs in the bottom 10% most deprived for crime deprivation. 	<ul style="list-style-type: none"> Reduce crime rates below current level. To reassure the public, reduce the fear of crime and anti-social behaviour. Reduce the number of wards with LSOAs in the bottom 10% most deprived. 	Flintshire Improvement Plan 2014-2015	Health Equalities	A healthier Wales A more equal Wales A Wales of cohesive communities
IIA Objective 2: To improve levels of educational attainment for all age groups and all sectors of society					
<ul style="list-style-type: none"> To increase levels of participation and attainment in education for all members of society To improve access to and involvement in lifelong learning opportunities To improve the provision of education and training facilities To improve qualification and skills for all parts of the community 	<ul style="list-style-type: none"> Percentage of learners in local authority schools achieving five or more GCSEs at Grades A* - C or the vocational equivalent. Reduction of surplus places. Outcomes in Mathematics, English / Welsh 1st Language and Core Subject Indicator at all Key Stages Completion of 21st Century school milestones in line with target dates Percentage of people aged 16-74 achieving National Vocational Qualification (NVQ) level 4/5. Percentage of resident population aged 16-74 with no qualifications. Number of educational establishments within the County. Percentage of people aged 16-74 who have attained either a Level 4 or Level 5 qualification. Percentage of people aged 16-74 who have attained NVQ Levels 1-4. 	<ul style="list-style-type: none"> Improve skills in literacy and numeracy. Continuing the implementation of 21st Century Schools programme Improve the education, training and employment prospects for young people up to 25 years of age 	Flintshire Improvement Plan 2014-2015 A Single Integrated Plan for Flintshire 2013 - 2017	Health Equalities	A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language
IIA Objective 3: To improve physical and mental health and wellbeing for all and reduce health inequalities					
<ul style="list-style-type: none"> To improve access to health and social care services especially in isolated areas To reduce health inequalities amongst different groups in the community 	<ul style="list-style-type: none"> Number of wards in the bottom 10% for health deprivation and disability. Percentage resident population who consider themselves to be in good health. Life expectancy at birth for males and females. 	<ul style="list-style-type: none"> Improve the accessibility of health information, services and advice. Reduce infant mortality rates. Improve accessibility of health and health promoting services especially for the hard to reach and vulnerable people which will 	Good Health Good Care in Flintshire 2011-2014 A Green Space Framework	Health Equalities	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
<ul style="list-style-type: none"> To promote healthy lifestyles Encourage the development of strong, cohesive communities 	<ul style="list-style-type: none"> Standardised Mortality Ratio and infant mortality rates. Percentage of people classified as being in good or very good health. Percentage of people participating in regular sport or exercise (defined as taking part on at least 3 days a week in moderate intensity sport and active recreation for at least 30 minutes continuously in any one session). Conception rate of under-18 year olds (per 1,000 15-17 year olds). 	<p>also help to increase the percentage of people classified as being in either good or very good health.</p> <ul style="list-style-type: none"> Reduce rate of teenage conception. Reduce the number of wards with LSOAs in the bottom 10% most deprived for health deprivation. Ensure that all communities have appropriate, available and accessible green space provision. 	Strategy for Flintshire 2013		
IIA Objective 4: To provide access to good quality, affordable housing that meets the needs and requirements of the community					
<ul style="list-style-type: none"> Ensure that there is sufficient housing to meet identified needs in all areas, including rural housing Ensure that housing meets acceptable standards Increase the availability of affordable housing Increase availability of housing for independent living Reduce levels of homelessness Reduce number of households in income poverty 	<ul style="list-style-type: none"> Average house prices compared to regional / national averages. Percentage of households living in type of accommodation. Number of houses in multiple occupation. Additional affordable housing provision. Proportion of housing vacant. 	<ul style="list-style-type: none"> Improve housing conditions in deprived areas. Housing quality – Building for Life Assessments should achieve a score of 100%. Provide a range of housing including affordable housing. To reduce the number of LSOAs in the bottom 10% most deprived for barriers to housing and services deprivation. 	Flintshire Local Housing Strategy 2012-2017	Health Equalities	<p>A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales</p>
5. To improve sustainable access to basic goods, services and amenities for all groups					
<ul style="list-style-type: none"> Ensure that public transport services meet all people's abilities and needs Ensure that highways infrastructure meets people's needs (including walking and cycling routes) Promote the use of sustainable travel modes and reduce dependence on the private car Improve access to cultural and recreational facilities, including Welsh culture and heritage 	<ul style="list-style-type: none"> Journey to work by mode. Distance travelled to work. Road condition. Number of wards in bottom 10% of most deprived in terms of barriers to and services provision. Percentage of residents finding it easy to access key local services within their neighbourhood. 	<ul style="list-style-type: none"> Reduce the number of LSOAs in the bottom 10%. Increase access to isolated areas. Improve transport links to rural communities, particularly sustainable transport provision. 	<p>Flintshire Regeneration Strategy 2009-2020 Draft North Wales Joint Local Transport Plan 2015-2020 Flintshire County Council Open Space Survey 2007</p>	Health Equalities Welsh Language	<p>A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales</p>

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
<ul style="list-style-type: none"> Maintain and improve access to essential services and facilities, including in rural areas Improve access to open space Conserve and enhance opportunities for public access to the countryside and coast 			Flint Strategy and Masterplan to 2021 Buckley Town Action Plan 2009-2012		
6. To build strong and cohesive communities					
<ul style="list-style-type: none"> Improve social cohesion and equality opportunities Reduce gender/age/disability/ gender/race/religion inequalities Ensure children who have any kind of disability can lead full and independent lives Ensure children can live to a standard that is good enough to meet their physical and mental needs Ensure children can develop healthily, and have access to good quality health care, clean water, nutritious food and a clean environment 	<ul style="list-style-type: none"> The number of reports of hate crime by protected characteristic. Percentage of people who feel that their local area is a place where people from different backgrounds can get on well together. Percentage of people who report that they feel they belong to their neighbourhood. 	<ul style="list-style-type: none"> Reduce health inequalities. Reduced unequal outcomes in education to maximise individual potential. Reduce inequalities in employment. Reduce inequalities in personal safety. Reduce inequalities in access to information and services, buildings and the environment. Increase the percentage of people who feel that their local area is a place where people from different backgrounds can get on well together. Increase the percentage of people who report that they feel they belong to their neighbourhood. 	Community Cohesion Strategy for Wales TAN 2	Equalities Health	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language
7. To promote a sustainable economy, business development and investment					
<ul style="list-style-type: none"> To encourage economic growth To diversify the economy and encourage new business formation and inward investment To encourage and promote sustainable tourism within the County. 	<ul style="list-style-type: none"> Gross Value Added per head. Value Added Tax. Economic activity rate. 	<ul style="list-style-type: none"> To increase economic activity rate. To increase new business start-ups. 	Flintshire Regeneration Strategy 2009-2020		A prosperous Wales A resilient Wales A more equal Wales
8. To provide employment opportunities across the County and promote economic inclusion					
<ul style="list-style-type: none"> To increase local employment opportunities across the County To improve access to jobs Maximise traineeship and apprenticeship opportunities 	<ul style="list-style-type: none"> Number of LSOAs in bottom 10% employment deprived. Percentage working unemployed. Employment in different sectors. Employment in different occupation groups. 	<ul style="list-style-type: none"> To reduce number of wards with LSOAs in the bottom 10% for employment deprivation. To reduce number of wards with LSOAs in the bottom 10% for income deprivation. 	Flintshire Regeneration Strategy 2009-2020	Equalities	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
<ul style="list-style-type: none"> To reduce levels of child and fuel poverty within the County 	<ul style="list-style-type: none"> Number of LSOAs in bottom 10% for income deprivation. 	<ul style="list-style-type: none"> Increase number of Flintshire residents assisted by Flintshire County Council to maximise their income. Increase the number of Council homes receiving energy efficiency measures. Increase small – medium sized enterprise (SME) employment. Increase the number of individuals receiving support to access employment, 	Flintshire Improvement Plan 2014-2015		
9. To maintain and improve the quality of life in rural areas					
<ul style="list-style-type: none"> To support rural diversification To encourage ICT / broadband links in rural areas 	<ul style="list-style-type: none"> Number of diversification schemes. Number of farmers markets. 	<ul style="list-style-type: none"> Increase the number of people benefitting from new rural services to support. Support schemes that will raise the standard of living and quality of life in rural communities 	Flintshire Regeneration Strategy 2009-2020		A more resilient Wales A more equal Wales A prosperous Wales A Wales of cohesive communities
10. To protect and enhance biodiversity and geodiversity					
<ul style="list-style-type: none"> To protect and enhance designated sites of nature conservation importance To protect the integrity of European, proposed European and listed Ramsar sites, or where not at a favourable conservation status, enhance their interest features To protect and enhance wildlife especially rare and endangered species To protect and enhance habitats and wildlife corridors To conserve, enhance and create appropriate wildlife habitats and wider biodiversity in urban and rural areas To avoid damage or fragmentation of designated sites, habitats and protected species and encourage their enhancement and connection 	<ul style="list-style-type: none"> Number and distribution of designated sites including SACs, SPAs, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR). Condition of SSSIs. Areas of woodland, including ancient woodland. Key Biodiversity Action Plan (BAP) species and habitats present within the County. Number of development schemes which design in urban biodiversity areas. Number of habitats created and maintained in urban and rural areas. 	<ul style="list-style-type: none"> No net loss in the number of sites, extent and current features of interest. There are a number of targets specific to each habitat and species action plan - although these may be too detailed for the LDP. No net loss in the area or number of sites of ancient woodland. To enhance the value of Flintshire green spaces as wildlife habitats. To improve the connectivity between green spaces as a network of green corridors accessible to both people and wildlife. Creation of green link harnessing the Town's existing open/green space and Waterfront. Where appropriate provide additional habitats such as wetland/ponds or scrub to increase interest and biodiversity value on greenspace. 	Flintshire County Council NRW A Greenspace Framework Strategy for Flintshire 2013 Flintshire County Council Open Space Survey 2007 Flint Strategy and Masterplan to 2021 Buckley Town Action Plan 2009-2012 Flintshire Coastal Park Green Infrastructure	HRA	A resilient Wales A healthier Wales A globally responsible Wales A Wales of cohesive communities A prosperous Wales

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
<ul style="list-style-type: none"> To provide opportunities for people to access wildlife and open green spaces To protect and enhance geodiversity 			Action Plan 2011		
11. To conserve and enhance the County's landscape and townscape character and quality					
<ul style="list-style-type: none"> To protect and enhance areas of landscape character and quality To protect and enhance townscape character and quality To respect and enhance local distinctiveness and diversity To promote sensitive design in development To protect and enhance the enjoyment of geological resources 	<ul style="list-style-type: none"> Landscape / townscape characterisation Landscapes of Historic Importance. Distribution and area of AONBs, National Parks and County landscape designations. 	<ul style="list-style-type: none"> No development in open countryside contrary to policy. Conserve and enhance the Special Qualities and distinctive character of the AONB's landscape and associated features. Protect the tranquillity of the AONB and take steps where possible to reduce noise and light pollution. 	Clwydian Range AONB Management Plan 2009-2014 Flintshire Coastal Park Green Infrastructure Action Plan 2011		A resilient Wales A more equal Wales A Wales of vibrant culture and thriving Welsh Language A Wales of cohesive communities
12. To protect and enhance the cultural heritage assets					
<ul style="list-style-type: none"> To protect and enhance heritage assets including Listed Buildings, Scheduled Monuments and Historic Landscapes To protect and enhance historic landscape value 	<ul style="list-style-type: none"> Number and distribution of Listed Buildings, Scheduled Monuments, Conservation Areas, Historic Landscapes and Registered Parks and Gardens. Number of Listed Buildings, on the at-risk register. Number of newly discovered HER sites/sites added to record. 	<ul style="list-style-type: none"> No increase in the number of Listed Buildings on the at-risk register. No loss or damage through development to designated sites and buildings. No loss of land within the register of historic landscape or within historic parklands. Support opportunities for archaeological survey and investigation. Promote responsible management of archaeological sites including conservation, access interpretation and education initiatives. 	Flintshire County Council Cadw		A prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
13. To protect and enhance the quality of water features and resources					
<ul style="list-style-type: none"> To protect and enhance ground and surface water quality To protect and enhance coastal waters Encourage sustainable use of water resources 	<ul style="list-style-type: none"> Water features. River quality water data. Presence of aquifers. Bathing water quality. 	<ul style="list-style-type: none"> Prevent deterioration of the status of all surface water and groundwater bodies. Protect, enhance and restore all bodies of surface water and groundwater with the aim of achieving identified Water Framework Directive targets. To meet EU bathing water standards. 	Flintshire Coastal Park Green Infrastructure Action Plan 2011	Health	A resilient Wales A healthier Wales A globally responsible Wales

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
		<ul style="list-style-type: none"> Encourage the use of Sustainable Drainage Systems (SuDS) in development design layout, directing rainfall away from the wastewater system. 	Dŵr Cymru/ Welsh Water Dee Valley Water NRW		
14. To reduce the risk of flooding					
<ul style="list-style-type: none"> To encourage the inclusion of flood mitigation measures such as sustainable urban drainage systems To reduce and manage flooding 	<ul style="list-style-type: none"> Flood risk. Distribution of areas at risk of coastal and fluvial flooding. Number of registered applications for development in flood risk areas. Percentage of development with SuDS. Households registered for flood warnings as a percentage of total number of households at risk of flooding. Number of applications permitted contrary to NRW advice on flooding. 	<ul style="list-style-type: none"> Take a sustainable approach to flood risk management. Reduce the consequences for individuals, communities, businesses and the environment from flooding and coastal erosion. Raise awareness of and engage people in the response to flood and coastal erosion risk. No new development on land at risk of flooding for lifetime of development. 	Flintshire Local Flood Risk Management Strategy 2013 NRW Welsh Government	Health	A resilient Wales A healthier Wales A globally responsible Wales
15. To protect and improve air quality and limit greenhouse gas emissions					
<ul style="list-style-type: none"> To protect and improve local air quality To reduce greenhouse gas emissions including in both existing and new development To reduce CO₂ emissions from the transport sector To encourage all new development to be climate change resilient To reduce negative effects of power generation, heavy industries and transport on local air quality To encourage cleaner technology for power regeneration, heavy industry and transport 	<ul style="list-style-type: none"> Air quality mean concentrations for PM₁₀ and NO₂. Total CO₂ emissions. Percentage of electricity produced/used in Flintshire generated from renewable sources. Proportion of alternative fuelled vehicles. 	<ul style="list-style-type: none"> No AQMAs currently designated or to be designated in the County. Reduce levels of pollution from transport. Achievement of UK Air Quality Strategy objectives for specific pollutants. 	UK Air Quality Strategy	Health	A resilient Wales A healthier Wales A globally responsible Wales
16. To increase energy efficiency, require the use of renewable energy and sustainable building design					
<ul style="list-style-type: none"> To reduce the demand for energy and increase energy efficiency 	<ul style="list-style-type: none"> Annual average domestic gas and electricity consumption per consumer. 	<ul style="list-style-type: none"> Increase the percentage of new buildings achieving high energy conservation ratings above current baseline. 	Flintshire Regeneration	Health	A prosperous Wales A resilient Wales A healthier Wales

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
<ul style="list-style-type: none"> To encourage sustainable building design To increase the use of renewable energy To increase the use of renewable energy To increase energy efficiency 	<ul style="list-style-type: none"> Number of renewable energy projects permitted in the County. 	<ul style="list-style-type: none"> Increase number of new developments with sustainable building design. Achieve measurable change that enhances the environment or improves sustainability. 	Strategy 2009-2020		A more equal Wales A Wales of cohesive communities A globally responsible Wales
17. To ensure sustainable use of natural resources					
<ul style="list-style-type: none"> Reduce the demand for raw materials Promote the use of recycled and secondary materials in construction Ensure that contaminated land will be guarded against Encourage development of brownfield land where appropriate Maintain and enhance soil quality Increase the proportion of waste recycling and re-use Reduce the production of waste Reduce the proportion of waste landfilled To protect peatland within the County 	<ul style="list-style-type: none"> Distribution of best and most versatile agricultural land. Soil types / classification. Percentage land stock contaminated. Total tonnage of municipal waste arisings. Percentage reused, recycled or composted. Total tonnage of municipal waste arisings, percentage landfilled. Mineral Reserves. Geology types. Peatland within the County. 	<ul style="list-style-type: none"> Protect the County's soils from contamination and continue to remediate areas which were impacted in the past. Significantly reduce waste and manage any waste that is produced in a way that makes the most of valuable resources by 2025. Maximise recycling, minimise the amount of residual waste produced and landfill as close to zero waste as possible. By 2050 as a minimum reduce the impact of waste in Wales to within environmental limits, approximately 65% less waste than current waste production. 	Towards Zero Waste, One Wales: One Planet -The Overarching Waste Strategy Document for Wales 2010	Health	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales
18. To encourage the protection and promotion of the Welsh Language					
<ul style="list-style-type: none"> Contribute to an increase in the number of Welsh language speakers across Flintshire Contribute to an increase in the proportion of Welsh language speakers who are fluent across Flintshire Contribute to an increase in the number of people who speak Welsh daily and who can speak more than just a few words of Welsh 	<ul style="list-style-type: none"> Number of Welsh medium school places Number of adults learning Welsh in the County. CIL or S106 Agreement contributions from large developments in areas where there is a high percentage of Welsh speakers in the Ward – for lessons or community activities in Welsh or Education. Number of businesses displaying bilingual signs and providing bilingual promotional information 	<ul style="list-style-type: none"> Increase the number of Welsh medium school places Increase in the number of adults learning Welsh. Increase in bilingual signage and information throughout the County. 	Welsh Language (Wales) Measure 2011; a million Welsh speakers by 2050	Welsh Language Health	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language

5. Stage B: Developing and Refining Options and Assessing Effects

5.1 Methodology

Positive and negative effects

Over the course of the preparation of the LDP, which has involved several iterations, the accompanying IIA has carried out an assessment of all options being considered by the Council for their likely sustainability effects. Assessments are presented in an appraisal matrix for each group of policies, clusters and allocations. The matrix is an established method for clearly analysing the performance of the policies or sites and helps meet the requirements of SEA.

The assessments of options involved predicting and evaluating the likely effects on each IIA Objective, including positive, neutral and negative effects as per Table 5-1.

Table 5-1: Assessment Scale

Impact	Description	Symbol
Major Positive Effect	The proposal strongly contributes to the achievement of the IIA Objective.	++
Positive Effect	The option contributes partially to the achievement of the IIA Objective.	+
No Impact / Neutral	There is no clear relationship between the option and/or the achievement of the IIA Objective or the relationship is negligible.	0
Negative Effect	The option partially detracts from the achievement of the IIA Objective.	-
Major Negative Effect	The proposal strongly detracts from the achievement of the IIA Objective.	--
Uncertain impact – more information required	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal, or the impact may depend heavily upon implementation at the local level.	?
Positive and Negative Effects	The option has a combination of both positive and negative contributions to the achievement of the IIA Objective.	+/-

Time, extent, permanence and probability

Effects are described in terms of their temporal nature, their spatial scale, their permanence and their probability as per Table 5-2.

Table 5-2: Notation used to identify types of effects

L-T	Effects likely to arise in 10-25 years of Local Plan implementation
M-T	Effects likely to arise in 5-10 years of Local Plan implementation
S-T	Effects likely to arise in 0-5 years of Local Plan implementation
D	Direct effects.
I	Indirect effects.
R	Effects are reversible
IR	Effects are irreversible
H/M/L	High, medium or low certainty of prediction

Mitigation and recommendations

Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse effects as a result of the Local Development Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are also identified, and recommendations made, where appropriate. These measures are included within the assessment text for all options assessed.

As the LDP is being developed in parallel to the IIA process, mitigation and enhancement measures have been fed back on a continual basis, through close collaboration with the LDP team.

Cumulative, synergistic and secondary effects

The SEA Directive requires, *inter alia*, that cumulative effects should be considered. It stipulates the consideration of “*the likely significant effects on the environment...*” and that “*these effects should include secondary, cumulative, synergistic...effects*” (Annex I). The Practical Guide sets out the following definitions for these terms:

- Secondary or indirect effects comprise effects which do not occur as a direct result of the proposed activities, but as a result of complex causal pathway (which may not be predictable);
- Cumulative effects arise from a combination of two or more effects, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan or programme have a combined effect; and
- Synergistic effects – synergy occurs where the joint effect of two or more processes is greater than the sum of individual effects.

The potential for cumulative, synergistic or secondary or indirect effects as a result of the LDP has been inherently considered within the appraisal process and is included within the results summarised below and detailed in Appendix D and Appendix E.

Technical Limitations and Uncertainties

During the assessment of the LDP, there has sometimes been uncertainty when predicting the potential effects. Where this has occurred, the uncertainty is identified within the appraisal matrices and accompanied by recommendations to mitigate potential adverse effects. In addition, a number of data gaps are identified within the baseline context where data is unavailable or out of date. These gaps do not impact on the robustness of the IIA. The LDP essentially acts as a guidance document for the future development of the Flintshire area. There is therefore reliance upon future decision-makers to ensure sustainable development is delivered using the IIA as a decision-aiding tool.

5.2 Reasonable Alternatives

“the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives” (SEA Directive, Art. 5.1)

“the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with” (SEA Directive, Art 9.1(b))

A key element of SEA is the consideration of reasonable alternative for all options in the LDP. The intention is that the Council’s decision-making process over, for example, what policies or site allocations to propose in the LDP is informed by evidence. The IIA has been an iterative process, with assessments of proposals and alternatives in the LDP, including recommendations for mitigating adverse effects or enhancing positive effects, provided to the Council throughout to help inform their decision-making during the preparation of the LDP. Results and recommendations have then been provided to the Council, and consulted on, across three stages of the IIA:

- Sustainability Appraisal of Strategic Options (October 2016)¹⁸;
- Integrated Impact Assessment of the Preferred Strategy (October 2017)¹⁹; and
- Integrated Impact Assessment of the Deposit LDP (September 2019) (this report).

¹⁸ Sustainability Appraisal of Strategic Options (October 2016) available online at: <https://www.flintshire.gov.uk/en/Resident/Planning/Flintshire-Local-Development-Plan.aspx>

¹⁹ Integrated Impact Assessment of the Preferred Strategy document of the Flintshire LDP (October 2017) available online at: <https://www.flintshire.gov.uk/en/Resident/Planning/Preferred-Strategy-Pre-Deposit-Public-Consultation.aspx>

Alternatives must be realistic and are likely to emerge during the plan-making process. Alternatives have been a focus for several legal challenges within the UK, and so it is important to ensure reasonable alternatives are meaningfully considered. If there are genuinely no reasonable alternatives to a plan proposal, alternatives should not be artificially generated.

Throughout the LDP and its accompanying IIA process, all reasonable alternatives have been assessed for their likely sustainability performance. The results of these assessments have then informed the Council's decision-making over which options should be their 'preferred options' and ultimately proposed in the LDP.

5.3 Strategic Options – Reasonable Alternatives

In 2016 the Council prepared the Strategic Options LDP document. This included six growth options and five spatial options (referred to as strategic options), as summarised in Tables 5-3 and 5-4.

Table 5-3: Summary of Growth Options

Growth Option	Household Growth	Household to Dwellings	Annual Figure
Growth Option 1 - 2011 based 10-year migration trend	3,600	3,750	250
Growth Option 2 – 2014 based 15-year migration trend	4,650	4,800	320
Growth Option 3 - 2014-based 15-year migration trend – 2008 headship rates	8,000	8,250	550
Growth Option 4 – 2014 based 10-year highest migration trend	6,400	6,600	440
Growth Option 5 - 2014-based 10-year highest migration trend – 2008 headship rates	10,050	10,350	690
Growth Option 6 - Employment-led projection 8-10,000 new jobs	6,350 - 7,100	6,550 – 7,350	440 - 490

Table 5-4: Summary of Spatial Options

Spatial Option 1 – Proportional Distribution
Description Developing a settlement hierarchy which allows for a proportional distribution of development based on sustainability principles
Spatial Expression / Settlements Affected This option is based on the 5-tier settlement hierarchy as set out below:
Main Service Centres, Local Service Centres, Sustainable Village, Defined Village, Undefined Village
Spatial Option 2 – Focussed Urban Growth
Description Directing all development to urban centres i.e. the upper two tiers of the settlement hierarchy
Spatial Expression / Settlements Affected This option is based on the top 2 tiers of the 5-tier settlement hierarchy as set out below:
Main Service Centres, Local Service Centres
Spatial Option 3 – Growth Area
Description Development would be focussed by directing all development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan.
Spatial Expression / Settlements Affected This option is based on delineating a boundary in map form which is based on the growth area triangle in the Wales Spatial Plan. It would encompass the following settlements:
Settlements Deeside Settlements, Mold, Sychdyn, New Brighton, Buckley, Mynydd Isa, Alltami, Penyffordd / Penymynydd, Hope Caergwrle, Abermorddu and Cefn y Bedd, Broughton, Saltney, Ewloe, Hawarden, Mancot, Northop, Northop Hall, Higher Kinnerton, Pontblyddyn, Dobshell
Spatial Option 4 – Hubs and Corridors

Description

Development would be distributed based on a strict interpretation of key road and rail transport hubs and routes.

Spatial Expression / Settlements Affected

This option is based on identifying the key strategic transport hubs and corridors and would focus on both public transport and key roads. The settlements that would fall within these hubs and corridors are as follows:

Settlements with Stations on Railway Corridors

Wrexham – Bidston Line:

Cefn y Bedd, Caergwrle, Hope, Penyffordd, Buckley (Little Mountain), Hawarden, Shotton, Hawarden Bridge

North Wales Coast Line:

Flint, Shotton

Settlements on Key Strategic Roads

A494(T):

Deeside Settlements, Ewloe, Alltami, New Brighton, Mynydd Isa, Mold, Sychdyn, Gwernymynydd, Cadole

A55(T):

Broughton & Bretton, Dobshell, Ewloe, Northop, Northop Hall, Drury & Burntwood, Flint Mountain, Halkyn, Pentre Halkyn, Carmel, Brynford, Gorsedd.

A548:

Deeside Settlements, Saltney, Flint, Bagillt, Greenfield, Mostyn, Ffynnongroyw, Penyffordd, Gwespyr, Gronant

Spatial Option 5 – Sustainable Distribution plus Refined Approach to Rural Settlements

Description

Development would be focussed on the first three tiers of the settlement hierarchy, based on identifying the most sustainable settlements and sites. In the rural settlements a more refined policy approach would be developed to ensure that a more flexible approach is taken to bringing about and delivering local needs housing.

Spatial Expression / Settlements Affected

This option is based on the first three tiers of the settlement hierarchy as shown below:

Main Service Centres, Local Service Centres, Sustainable Village

For the following tiers in the settlement hierarchy a more refined policy approach will be developed which seeks to embrace more innovative methods of delivering development in a sensitive, needs driven, sustainable manner.

Defined Village, Undefined Village

Each Strategic Option was assessed for its likely sustainability effects in the SA of Strategic Options SA Report (October 2016). The assessment was undertaken using a simple matrix-based approach, in Autumn 2016. The recommendations provided contributed to their refinement and definition of the Preferred Strategy. The assessments are presented in their entirety in Appendix C.

The different options all scored similarly across the environmental Objectives in terms of development, as it was anticipated that most sites coming forward will be on greenfield land. Most developable land within Flintshire is located near to the coast or rivers, particularly within the Deeside Area. Although this is protected by flood defences, negative effects were assigned on a precautionary basis. Similarly, it is expected that the growth within the County will lead to increased car use compared to the baseline situation as well as an increase in energy use, waste production and natural resource use.

Compare to the similarities of the assessment outcome between the five Options and the environmental Objectives, a greater variation was seen between the Options when assessed against the social and economic IIA Objectives.

Spatial Option 1 provides a proportional spread of development depending on proximity to services, with the highest growth scenario likely to provide the greatest benefits to Flintshire in terms of being able to improve existing, and provide new infrastructure, for the County. However, the Option is relatively rigid in how it determines numbers of housing according to the definition given to a particular settlement, and hence, higher growth scenarios could fail to recognise that some settlements do not have capacity to meet such a growth in housing numbers.

Spatial Options 2, 3 and 4 perform similarly with regard to the social and economic Objectives, as they are all particularly focussed on a particular geographical aspect of development (Option 2 looking at existing urban growth, focussing growth only in Main and Local Service Centres, Option 3 looking at growth in identified settlements only, according to the Wales Spatial Plan, and Option 4 along transport corridors). Across the assessments, concerns were raised that the whilst these will ensure that growth is coupled with Flintshire's drive to improve its economy following the recession, such growth strategies

will have a negative impact on the rural life objective as well as create an imbalance of employment across Flintshire (i.e. by focussing all development around the Deeside Enterprise Zone).

Spatial Option 5 is a variation of Option 1 but uses a more case-by-case approach to ensure that rural growth and viability is guided by local circumstances. As such, Option 5 was taken forward to inform the Preferred Strategy.

5.4 Justification for the Preferred Growth and Spatial Options

After careful consideration of the options available, the Council identified their preferred strategy for the LDP and underwent a pre-Deposit consultation on a Preferred Strategy LDP between 09 November 2017 and 21 December 2017. The Preferred Strategy LDP (2017) also set out the Council's preferred spatial strategy, which remains unchanged and is now proposed in the Deposit LDP (September 2019). The preferred option for the spatial distribution of development is based on Spatial Option 5 of 'Sustainable Distribution plus a Refined Approach to Rural Settlements' whereby growth is directed to the top three tiers of the settlement hierarchy and in the bottom two tiers provision is focussed around meeting local needs.

The Preferred Strategy LDP (2017) set out the Council's preferred option for growth, which remains unchanged and is now proposed in the Deposit LDP (September 2019). The preferred option for the level of growth is for the LDP to seek to deliver 8-10,000 jobs through approximately 223ha of employment land, supported by a housing provision for 7,645 new homes to meet a housing requirement of 6,950 dwellings. This represents a mix of Growth Options 4 and 6.

Local demographic, housing and economic information has been used to select the preferred option. The growth options are informed by demographic trends and projections and the effect of different assumptions in producing options. A further consideration is the ability of the market and development industry to deliver the development that the Plan will make provision for. The Council are seeking a level of growth based on the prevailing economic conditions in Flintshire, the availability of development finance, or the capacity of local and regional developers to respond to the provision made by the Plan, set against a local landbank.

Central to the Council's justification for the proposed growth option is that there is an essential need to ensure that the level of growth being pursued is viable and deliverable. Based on feedback from a number of developers operating locally in response to the Strategic Options consultation there was a general consensus that the higher growth options were not appropriate or achievable.

The Council recognises that to simply rely on a relatively low level of projected household growth would not provide a sound basis to develop and support the growth ambition for the LDP, triggered by the need for economic recovery and job growth, capitalising on Flintshire's location and role in the local and wider sub-regional economy. The Strategy aims to promote economic development and the County's contribution to the wider regional economic Growth Vision, with the need to enable the delivery of jobs, homes and where necessary, infrastructure, required to accommodate this growth sustainably.

The Council's key reasons for pursuing the preferred strategy include:

- Maintain an employment land portfolio of 139.67 hectares to reflect Flintshire's strategic location, historical pattern of development, and provision of a choice of investment opportunities.
- Aim to facilitate Flintshire's contribution to the regional Growth Vision job creation aspiration, by enabling 8-10,000 jobs to be created;
- Ensuring a housing land supply to provide for 7,950 dwellings to meet an LDP housing requirement of 6,950 dwellings;
- This requirement is derived from the employment led growth option and provides sufficient housing to support economic growth;
- This equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 (573 over the last 5 years). Completions in the first three years of the Plan period have averaged 563 (1,691 in total), showing that the Plan is on track in terms of enabling delivery;

- There is capacity for a further 1,771 dwellings on sites with planning permission (commitments) which are either under construction or expected to be delivered within 5 years. The Plan makes modest allowances for wind fall and small sites development and the evidence base shows that greater potential capacity exists here;
- Whilst the residual requirement for new sites is 879, the Plan has allocated 1,874 dwellings on sustainable new sites, providing as a consequence for an overall flexibility of 14.4%. This is a generous over-provision and will help ensure the overall deliverability of the Plan's housing requirement;
- The Plan has chosen a sustainable and flexible approach to distributing growth in the upper three tiers of the sustainable settlement hierarchy, within the main and local service centres, as well as the sustainable villages;
- Part of the approach to enabling growth has been to allocate sufficient sites to provide a range of choice of viable development options, whilst also ensuring that the significant land bank of undelivered permissions is also brought forward. Whilst the Plan also has two strategic site allocations with significant elements of housing, the Plan is not over-reliant on these, and in any event a significant element of delivery of housing on the larger of the two sites at Northern Gateway is imminent via two applications for large phases of housing. The Plan's aim of a 15% flexibility allowance will also help balance this strategic commitment;
- The spatial strategy comprising two strategic sites and a range of smaller housing allocations is considered to sit comfortably alongside the spatial strategy of Chester West and Chester Council which includes a strategic mixed-use development at Wrexham Road, Chester and that of Wrexham County Borough Council which includes two strategic allocations at Wrexham town and a range of smaller housing allocations;
- Green Barriers (wedges) have been reviewed and designated to strategically manage growth and urban form, and to fulfil their role in maintaining the openness of the area they cover;
- The Council has worked with infrastructure providers in the development of the Plan to ensure that there is sufficient capacity to accommodate growth, or that capacity can be increased, how, and when, in order for development to take place; and
- The sites allocated in the plan to provide for growth are also deliverable, having been independently assessed in terms of their viability. There are therefore no barriers to deliverability within the Plan, and it will be for the development industry to respond positively to the opportunities offered by the Plan.

5.5 Vision and Narrative

Within the Preferred Strategy LDP (2017) document the Council proposed a Vision for Flintshire by 2030, which is now proposed in the Deposit LDP (September 2019):

"The LDP is about people and places. It seeks to achieve a sustainable and lasting balance which provides for the economic, social, and environmental needs of Flintshire and its residents, through realising its unique position as a regional gateway and area for economic investment, whilst protecting its strong historic and cultural heritage."

The Council also proposed 19 Strategic Objectives in the Preferred Strategy LDP (2017) document, which are now proposed in the Deposit LDP (September 2019), designed to help ensure the Vision is achieved. The Strategic Objectives, which are split between three themes, are presented in Table 5-5.

Table 5-5: Strategic Objectives of the LDP

Enhancing Community Life	
1	Ensure communities have access to a mix of services and facilities, such as education and health, to allow community life to flourish, and meet the needs of particular groups such as the elderly

2	Encourage the development of town and district centres as the focus for regeneration
3	Promote a sustainable and safe transport system that reduces reliance on the car.
4	Facilitate the provision of necessary transport, utility and social / community infrastructure.
5	Facilitate the sustainable management of waste.
6	Protecting and supporting the Welsh Language.
7	Create places that are safe, accessible and encourage and support good health, well-being and equality.
Delivering Growth and Prosperity	
8	Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors.
9	Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region
10	Redefine the role and function of Flintshire's town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport.
11	Ensuring that Flintshire has the right amount, size, and type of new housing to support economic development and to meet a range of housing needs.
12	Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure.
13	Promote and enhance a diverse and sustainable rural economy.
14	Support the provision of sustainable tourism development
Safeguarding the Environment	
15	Minimise the causes and impacts of climate change and pollution
16	Conserve and enhance Flintshire's high-quality environmental assets including landscape, cultural heritage and natural and built environments.
17	Maintain and enhance green infrastructure networks.
18	Promote good design that is locally distinct, innovative and sensitive to location.
19	Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land.

The LDP's Strategic Objectives are clear statements of intent that focus in on how the LDP Vision will be delivered. Like the Vision, they take the key challenges facing the County and align them with the three themes of sustainable development:

- Enhancing Community Life;
- Delivering Growth and Prosperity; and
- Safeguarding the Environment.

One of the key challenges of producing a sustainable plan is to ensure that a reasonable balance is achieved between these elements of sustainability. This will need to minimise the potential conflicts that will arise from such a broad ranging set of LDP Objectives. This process has been aided by assessment of the Objectives through the IIA process, the outcome of which has been used to refine the Objectives and reduce the areas of potential conflict. The IIA Objectives will also form part of the basis for monitoring the implementation of the Plan, once adopted and operational.

Good practice guidance recommends that the key aims and principles of the LDP should be tested for their compatibility with IIA Objectives and to determine whether they accord with broad sustainability principles. Overall, the LDP Strategic Objectives are considered to be highly compatible with the IIA Objectives (see Table 5-6). A brief summary of each is given below under the relevant heading.

Enhancing Community Life

The seven Objectives grouped under this heading aim to ensure that all parts of Flintshire are given the same opportunities to develop into sustainable societies for all members of the community. The development of town and district centres (Objective 2) and the focus on such areas for regeneration needs to be carefully managed to ensure that sustainable transport links are encouraged. Car use is an increasing issue in Flintshire, which is a largely rural county, but not all members of a community are able or willing to drive. Therefore, the Local Plan needs to be mindful of not only the impact on

greenhouse gas emissions and air quality, but also to ensure that all communities can be catered for throughout the lifetime of the Plan (and aided by Objective 7).

Delivering Growth and Prosperity

The seven LDP Objectives grouped under this heading aim to ensure Flintshire can continue to be an area of economic growth for Wales as well as the Deeside sub-region and has the right kind of supporting development (town centres, Objective 10 and housing, Objective 12) that will encourage businesses to invest in the area. Objective 13 and, to some extent, 14 seek to ensure that Flintshire's rural economy is also promoted.

Broadly, the LDP Objectives score well against the IIA Objectives though some uncertainty can be seen for objectives 10 and 12 and against IIA Objective 5 (sustainable access to basic goods). A promotion of town centres could mean that not all people have the same level of access to services, particularly if they are living in very rural conditions without reliable access to a wide range of transport options. The objective on diversifying the rural economy (Objective 13) needs to be mitigated for in relation to the IIA objective on air quality (Objective 15). Reliance on the private car will only lessen if other transport options are developed, particularly within rural communities and this needs to be considered.

Safeguarding the Environment

The five objectives grouped under this heading aim to ensure that Flintshire's natural and historical environments continue to be protected, that its green infrastructure network will be enhanced as well as ensuring that the impact of Flintshire's continued economic growth. In the main, these objectives perform well against the IIA Objectives. There is some uncertainty on objective 18 with regard to the IIA Objective on quality of life in rural areas (IIA Objective 9). Good design that is innovative may mean a detraction from traditional building techniques for which an area is known so these need to be considered carefully for all future developments.

Table 5-6: Compatibility of the Local Development Plan Narrative with the IIA Objectives

✓ Objectives are compatible										✗ Objectives likely incompatible if not mitigated									
0 There is no link between Objectives										? The link between the Objectives is uncertain									
IIA Objective	Enhancing Community Life						Delivering Growth and Prosperity									Safeguarding the Environment			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
1: Crime	0	0	0	✓	0	0	✓	0	0	0	0	0	0	0	0	0	0	✓	0
2: Education	0	0	0	0	0	0	✓	✓	0	✓	0	0	0	0	0	0	0	0	0
3: Health	✓	0	0	✓	0	0	✓	0	0	0	0	0	0	0	0	✓	0	✓	0
4: Housing	?	0	✓	0	0	0	✓	0	0	0	✓	✓	0	0	0	0	0	✓	0
5: Access	✓	?	✓	✓	0	0	✓	0	0	?	✓	?	0	0	0	0	0	✓	0
6: Communities	✓	✓	0	✓	0	0	✓	✓	0	✓	✓	✓	0	✓	0	0	0	✓	0
7: Economy	0	✓	0	✓	0	0	0	✓	✓	✓	✓	0	✓	✓	0	0	0	0	0
8: Employment	0	✓	✓	0	0	0	✓	✓	✓	✓	0	0	✓	✓	0	0	0	0	0
9: Rural life	✓	0	0	✓	0	0	✓	0	0	0	?	?	0	0	✓	✓	0	?	0
10: Biodiversity & geodiversity	0	✓	?	0	0	0	0	0	?	✓	?	✓	0	0	✓	✓	✓	0	0
11: Landscape & townscape	0	✓	?	0	✓	0	0	0	0	✓	0	0	0	0	0	✓	✓	✓	0
12: Cultural heritage	0	?	0	?	0	0	0	0	0	0	0	0	0	0	0	✓	0	0	0
13: Water	0	?	0	0	0	0	0	0	?	?	0	✓	0	0	✓	✓	0	0	0
14: Flooding	0	?	0	0	0	0	0	0	0	0	0	0	0	0	✓	✓	0	0	✓
15: Air quality & GHGs	0	✗	✓	?	0	0	0	0	?	?	0	?	✗	0	✓	0	0	0	✓
16: Energy	0	✓	✓	?	0	0	0	0	0	0	?	✓	✓	0	✓	0	0	0	✓
17: Natural resources	0	✓	✓	?	0	0	0	0	0	?	0	✓	✓	0	✓	0	0	0	✓
18: Welsh Language	0	0	0	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0

5.6 Strategic Policies

In addition to establishing the Council's preferred options for growth and spatial distribution, as well as the Vision and Strategic Objectives, the Preferred Strategy LDP (2017) established 16 Strategic Policies for the LDP (see Table 5-7). Following consultation, updates to planning law and new evidence in Flintshire, these Strategic Policies were updated slightly to form the versions proposed in the Deposit LDP.

Each strategic policy was assessed in the SA Report accompanying the Preferred Strategy LDP (2017) pre-deposit consultation. The only change to the Strategic Policies between the 2017 consultation and the Deposit consultation was the increase in the overall housing requirement of around 300 homes. The updated and final assessments of Strategic Policies are presented in their entirety in Appendix C and summarised below. The scores recorded for each Strategic Policy against each IIA Objective are presented in Table 5-8. Policy STR3 is comprised of two strategic site allocations and is therefore included in the sites assessments discussion below.

Table 5-7: Strategic policies originally established in the Preferred Strategy LDP and now proposed in the Deposit LDP

Strategic Policies
Creating Sustainable Places and Communities
Policy STR1: Strategic Growth
Policy STR2: The Location of Development
Policy STR3: Strategic Sites
Policy STR4: Principles of Sustainable Development, Design and Placemaking
Policy STR5: Transport and Accessibility
Policy STR6: Services, Facilities and Infrastructure
Supporting a Prosperous Economy
Policy STR7: Economic Development, Enterprise and Employment
Policy STR8: Employment Land Provision
Policy STR9: Retail Centres and Development
Policy STR10: Tourism, Culture, and Leisure
Meeting Housing Needs
Policy STR11: Provision of Sustainable Housing Sites
Policy STR12: Provision for Gypsies and Travellers
Valuing the Environment
Policy STR13: Natural and Built Environment, Green Networks and Infrastructure
Policy STR14: Climate Change and Environmental Protection
Policy STR15: Waste Management
Policy STR16: Strategic Planning for Minerals

Strategic policies - Creating Sustainable Places and Communities

The six policies under the banner of Creating Sustainable Places and Communities seek to set the scene and provide clear direction as to how Flintshire will be LDP period. The policies seek to ensure that employment is the main driving factor for Flintshire's continued growth which will, in turn, encourage inward investment and bring about improvements in Flintshire's services and infrastructure.

STR1 and STR2 have been assessed jointly as they should be considered together so as to ensure the strategic growth approach works in relation to the proposed location of development. These policies perform well against the IIA Objectives on housing, employment and economy. It is unclear at this stage how the IIA Objective on social cohesion would be impacted by this policy, and it is considered that there is scope to enhance the level of detail regarding rural considerations (IIA Objective 9) within STR2.

STR3A and STR3B provide a strategic direction on what Flintshire would deem acceptable at two strategic sites – Northern Gateway and Warren Hall respectively. STR3A scores well against the housing, access and crime objectives but the strategic policy does not give a great deal of clarity on how the impact on biodiversity and landscape will be mitigated. A positive effect can be seen on the

flooding objective given that the policy seeks to ensure a sustainable drainage/flood management element to the development at Northern Gateway. STR3B performs well against the housing and access objectives as well as the economy and employment objectives.

STR4, STR5 and STR6 each provide a strategic direction on how development should be implemented within the County, how transport, including public transport and walking/cycling, should be considered throughout the lifetime of the plan and what services should be improved within Flintshire as a result of incoming development. STR4 performs well against the majority of the IIA Objectives although there are uncertain effects on the objective on rural life as it is not clear how such development will reflect within a rural context. Similarly, seeking to protect heritage sites may be beneficial to the objective on Welsh language as it could encourage a renewed interest in Welsh culture, but this is unclear and of low probability.

STR5 and STR6 both perform well against the IIA Objectives although there is an inherent conflict between introducing new transport routes (STR5) and the objectives on biodiversity and land/townscape due to the likely land take needed for such development. In such instances, it will be important for the policies to be read as a whole and therefore also consider the policies on environmental protection. STR6 performs well against almost all IIA Objectives, except for those on crime and health, due to these topics not being referenced within the effects that any new development should be mitigating.

Strategic policies – Supporting a Prosperous Economy

The four policies under the banner of Supporting a Prosperous Economy seek to provide a strategy on how Flintshire's economy will be supported throughout the lifetime of the LDP by a wide range of economic streams for growth from retail, to sustainable tourism and strategic employment sites, focussed around the Deeside/Broughton area. The policies seek to ensure that employment is successful and will aid Flintshire's economic recovery, particularly after the global recession.

STR7, the policy on economic development and employment, scores positively or significantly positively against the social and economic objectives. The aim here is to provide employment that suits Flintshire's existing skillset, but also seeks to ensure that enterprise is rewarded and that the County can grow its skills. This will have benefits on the IIA Objectives around education and social cohesion as well as health. For the environment objectives, a worst-case negative impact has been assumed. Strategic sites aside, there is insufficient detail available at this stage to understand the impact on objectives such as biodiversity and heritage, so these have been scored negatively on a precautionary basis, although mitigation, through other policies such as STR4, STR13 and STR14, has potential to reduce/neutralise these effects.

STR8, employment land provision, scores positively against the access and education objectives, as it seeks to not only protect current employment sites but also provide new sites. The provision of new employment land would make a significant contribution towards reducing local rates of unemployment and deprivation, which in turn would help to combat anti-social behaviour, poverty and depression. A mixed impact is expected on the crime objective as new employment development could be a target for crime in locations where there is currently no development. However, it would also be a regeneration catalyst that could reduce local rates of unemployment or deprivation which subsequently reduces the risk of crime. With mitigation, it is likely that the mix of new sites and expansion of existing employment land will provide both positive and negative effects on the environmental objectives; this mitigation can be provided by ensuring sustainable design (STR4) and applying STR13 (natural/built environment and green networks) to such sites. The Welsh language objective has an uncertain impact applied to it – provision of new employment sites to help stimulate growth could attract new residents to Flintshire and also encourage local, potentially Welsh speaking people, to stay but it is difficult to judge this at this strategic level.

STR9, on retail centres and development, scores positively on health, access and very positively on the social cohesion objectives, as well as against the economic objectives. Town and district centres will be the preferred locations for retail and other uses and this increase could encourage the vibrancy and viability of existing spaces, as well as make use of existing sites. There is a potential positive impact on the landscape/townscape objective as the focus is town-based rather than on out-of-town retail developments, which should help protect greenfield locations. Both positive and negative effects can

be seen on the heritage, air and natural resources objectives – the expansion of sites could increase car use into town centres, but they are also the most accessible via sustainable transport. Similarly, the setting of heritage assets could potentially be both enhanced and detracted from through town-centre development depending on how it is designed. Policy STR4 sets out design principles which could help to mitigate negative impacts on setting or character.

STR10, on tourism, culture and leisure, scores very positively against the economic objectives as the policy seeks to ensure that tourism remains viable as a source of employment and economic growth in Flintshire year-round. This will contribute in turn to a likely positive conservation of protected sites within Flintshire, whether that's biodiversity, landscape/townscape or heritage designations. It is important that such sites are also well managed to avoid any form of degradation due to increased visitor pressure.

Strategic policies – Meeting Housing Needs

The two policies within the Meeting Housing Needs banner relate to provision of housing sites as well as specific provision for other types of communities, such as gypsies, travellers and travelling showpeople.

STR11 has positive effects on almost all of the social objectives, with a mixed impact relating to the objective on crime. New housing developments on greenfield sites have the potential to create new crime targets though it is anticipated that the detail around design of such sites will mitigate such risk. The policy aim is to provide a range of housing that suits the growing and varied needs of Flintshire and at different economic levels. As such, the economic objectives can also be indirectly met as the diverse housing provision encourages a diverse workforce. At this strategic level, the policy does not specify particular locations for housing (this is instead directed broadly by STR2) and as such, a negative impact has been assigned for many of the environmental objectives on a precautionary basis. It is thought, that with reference to the other environmental policies within the Preferred Strategy, that many of these effects can be neutralised.

STR12 relates specifically to gypsy, traveller and travelling showpeople provision. The assessment shows mainly uncertain and neutral effects. This is due to the policy not identifying how sites for gypsies, travellers and travelling showpeople will be identified and it's therefore been difficult to ascertain how the policy will contribute to the wider sustainability aims of such groups within Flintshire.

Strategic policies – Valuing the Environment

The policies within Valuing the Environment seek to provide a range of environment related guidance for the development and protection of Flintshire's assets. Strong environment policies in the LDP will ensure that the environmental impact of the growth proposals is minimised as much as possible.

STR13 focuses on the protection and enhancement of Flintshire's wide range of natural and built assets. Maintaining and increasing greenspace provision will have a positive impact on the health, access and social cohesion objectives. An indirect positive link can be seen in the IIA Objective on economy, as better green spaces may attract further inward investment, through increasing the attractiveness of the area to both employers and employees. Overwhelmingly there is a positive effect on the environmental objectives as the policies seek to protect and enhance both protected and unprotected spaces.

STR14, on climate change and environmental protection, would be likely to have a positive impact due to measures to improve air quality and mitigate land contamination. Whilst measures to minimise business impact on climate change could be costly for business and potentially discourage investment, it could also help to enhance the sustainability of the local economy whilst attracting greater inwards investment.

STR15, on waste management, has a neutral effect on all the social objectives and the majority of the economic objectives. The development of new waste facilities could, however, attract inward investment into Flintshire (a benefit for the IIA economy objective). An indirect positive effect is likely against the biodiversity and land/townscape objectives, as the policy seeks to ensure sites are located on existing and already allocated sites rather than new greenfield spaces. Furthermore, positive effects are likely against the energy and natural resource objectives, as investment in newer waste facilities could help to clean up smaller, more polluting sites as well as provide an alternative energy source for the County.

The diversion of waste from landfill would help to reduce greenhouse gas emissions, particularly methane, which would have a positive effect on climate change.

STR16, on minerals planning, has a neutral effect on the social IIA objectives, and an uncertain impact on the housing one with regard to the sterilisation of minerals due to other development. A positive effect is seen across the IIA economy objectives as the policy ensures that Flintshire's rich mineral resource will be protected from sterilisation and therefore can be a continued source of materials to support Flintshire's employment and economy. Both positive and negative effects are expected for the environmental objectives – extraction of a resource such as aggregate carries an environmental cost but this can be offset against ensuring that protected sites remain protected and that restoration plans for such mineral rich areas consider biodiversity, landscape, heritage and water issues.

Table 5-8: SA scores recorded for each Strategic Policy against each IIA Objective

++	Major Positive Effect									--	Major Negative Effect								
+	Positive Effect									?	Uncertain impact – more information required								
O	No Impact / Neutral									+/-	Positive and Negative Effects								
										-	Negative Effect								
Strategic Policy	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
	Creating Sustainable Places and Communities																		
	STR1	+/-	+/-	+/-	++	+	+/-	++	++	+/-	--	-	-	-	-	+/-	-	-	+/-
	STR2	+/-	+/-	+/-	++	+	+/-	++	++	+/-	--	-	-	-	-	+/-	-	-	+/-
	STR4	+	O	+	+	+	+	O	O	+	++	++	++	++	+	++	+	+	?
	STR5	+/-	+	+	+	++	+	++	++	+	+/-	+/-	?	-	-	+/-	+/-	+/-	?
	STR6	?	++	+	+	+	+	+	+	+	+/-	+/-	+/-	+	+	+/-	O	O	+
	Supporting a Prosperous Economy																		
	STR7	+	+	+	+	+	+	++	++	++	--	-	-	-	-	-	-	-	?
	STR8	+/-	+	+	+	+	+	++	++	+	--	-	O	-	-	-	-	-	?
	STR9	+/-	O	+	O	+	++	+	+	+	O	+	+/-	-	-	+/-	-	+/-	+
	STR10	O	+	+	O	+	+	++	+	++	+	+	+	+	+	+	+	+	?
	Meeting Housing Needs																		
	STR11	+/-	+	+	++	+	+	+	+	+	-	-	-	-	-	+/-	-	-	?
	STR12	?	?	?	+	?	?	O	O	O	-	-	-	?	-	?	?	?	?
	Valuing the Environment																		
	STR13	O	O	+	O	+	+	+	O	?	++	++	++	+	++	+	O	+	+
	STR14	O	O	+	O	O	O	+/-	O	O	+	+	O	++	++	++	++	++	O
STR15	O	O	O	O	O	O	+	+	O	+	+	-	+	O	+	+	+	O	
STR16	O	O	O	+/-	O	O	+	+	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	O	

6. Stage B: Development Management Policies and Site Allocations

6.1 Introduction

The Deposit LDP (September 2019) sets out the version of LDP that Flintshire CC intend to submit for examination and eventually adopt. The Deposit LDP (September 2019) brings together the Vision, Strategic Objectives and Strategic Policies (including the Strategic Options) established during previous versions of the LDP, with Development Management (DM) Policies and site allocations. The purpose of this chapter is to determine how DM Policies and site allocations have been identified and selected as well as the SA assessment results of each.

6.2 Development Management Policies

The range of DM Policies proposed in the Deposit LDP (September 2019) are listed in Table 6-1. Each of these policies has been assessed in detail in Appendix C. Table 6-2 presents the scores recorded for each policy against each IIA Objective.

Table 6-1: Development management policies in the Deposit LDP

Development Management Policies
Creating Sustainable Places and Communities
Policy PC1: The Relationship of Development to Settlement Boundaries
Policy PC2: General Requirements for Development
Policy PC3: Design
Policy PC4: Sustainability and Resilience of New Development
Policy PC5: Transport and Accessibility
Policy PC6: Active Travel
Policy PC7: Passenger Transport
Policy PC8: Airport Safeguarding Zone
Policy PC9: Protection of Disused Railway Lines
Policy PC10: New Transport Schemes
Policy PC11: Mostyn Docks
Policy PC12: Community Facilities
Supporting a Prosperous Economy
Policy PE1: General Employment Land Allocations
Policy PE2: Principal Employment Areas
Policy PE3: Employment Development Outside Allocated Sites and Principal Employment Areas
Policy PE4: Farm Diversification
Policy PE5: Expansion of Existing Employment Uses
Policy PE6: Protection of Employment Land
Policy PE7: Retail Hierarchy
Policy PE8: Development within Primary Shopping Areas
Policy PE9: Development outside Primary Shopping Areas
Policy PE10: District and Local Centres
Policy PE11: Edge and Out of Town Retail Development
Policy PE12: Tourist Accommodation, Facilities and Attractions
Policy PE13: Caravan Development in the Open Countryside
Policy PE14: Greenfield Valley
Meeting Housing Needs
Policy HN1: New Housing Development Proposals
Policy HN2: Density and Mix of Development
Policy HN3: Affordable Housing
Policy HN4: Housing in the Countryside

Development Management Policies
Policy HN4-A: Replacement Dwellings
Policy HN4-B: Residential Conversion of Rural Buildings
Policy HN4-C: Infill Development in Groups of Houses
Policy HN4-D: Affordable Housing Exceptions Schemes
Policy HN5: House Extensions and Alterations
Policy HN6: Annex Accommodation
Policy HN7: Houses in Multiple Occupation
Policy HN8: Gypsy and Traveller Sites
Policy HN9: Gypsy and Traveller Accommodation
Valuing the Environment
Policy EN1: Sports, Recreation and Cultural Facilities
Policy EN2: Green Infrastructure
Policy EN3: Undeveloped Coast and Dee Estuary Corridor
Policy EN4: Landscape Character
Policy EN5: Area of Outstanding Natural Beauty
Policy EN6: Sites of Biodiversity Importance
Policy EN7: Development Affecting Trees, Woodland and Hedgerows
Policy EN8: Built Historic Environment and Listed Buildings
Policy EN9: Development in or Adjacent to Conservation Areas
Policy EN10: Buildings of Local Interest
Policy EN11: Green Barriers
Policy EN12: New Development and Renewable and Low Carbon Energy Technology
Policy EN13: Renewable and Low Carbon Energy Development
Policy EN14: Flood Risk
Policy EN15: Water Resources
Policy EN16: Development on or near Landfill Sites or Derelict and Contaminated Land
Policy EN17: Development of Unstable Land
Policy EN18: Pollution and Nuisance
Policy EN19: Managing Waste Sustainably
Policy EN20: Landfill Buffer Zone
Policy EN21: Locations for Waste Management Facilities
Policy EN22: Criteria for Waste Management Facilities and Operations
Policy EN23: Minerals Safeguarding
Policy EN24: Minerals Buffer Zones
Policy EN25: Sustainable Minerals Development
Policy EN26: Criteria for Minerals Development
Policy EN27: Secondary and Recycled Aggregate

6.3 Summary of assessments

DM Policies - Creating Sustainable Places and Communities

DM policies under this theme were consistently predicted to make positive contributions towards most IIA Objectives with a range of significant positive effects predicted. Overall, these policies would be likely to help ensure that new development in Flintshire is of a scale, type and location that is relatively sustainable and that contributes towards the formation of high-quality and resilience places. In particular, these policies would be likely to make a major contribution towards reducing crime and the fear of crime; improving the health and wellbeing of local people; protecting and enhancing biodiversity and landscapes and reducing the County's carbon footprint and GHG emissions. Minor negative effects were predicted for Policy PC10 against IIA Objectives 10 and 11, primarily due to the potential effects of new transport schemes on ecological connectivity (new routes can impede the free movement of wildlife and lead to isolated islands of habitat) and landscape character.

DM Policies - Supporting a Prosperous Economy

Policy PE1 allocates sites for employment development and so is considered further in the site assessments section below. All other Prosperous Economy DM policies proposed in the LDP would be expected to help ensure that new development in Flintshire over the Plan period is of a scale, type and location that ensures local and county-wide employment needs are met whilst the County's economy can grow, diversify and play an important role in the regional economy. Major positive effects were predicted for these policies against IIA Objectives 7 and 8, which focus on employment and the economy, with minor positive effects predominantly predicted elsewhere. The only negative effects predicted were minor negative effects predicted for policies PE12, PE13 and PE14 against the natural resources objective, primarily due to the potential losses of soils caused by development on greenfield.

DM Policies - Meeting Housing Needs

HN1 allocates new sites for housing and HN8 allocates sites for gypsy and traveller accommodation. These policies have therefore been considered further in the discussion of site allocations below. All other housing policies would help to ensure that over the Plan period the varied needs of Flintshire's growing population can be satisfied. These policies would be expected to make a major contribution towards ensuring new and existing people in Flintshire can live in safe and high-quality homes that are of a scale, location and type that is appropriate to local needs, enables relatively sustainable living and contributes towards cohesive communities. A very limited number of potentially minor negative effects were predicted, predominantly due to the risks associated with new development, such as the loss of greenfield and open space, as well as the influx of new residents potentially increase visitor access associated disturbances on sensitive habitats.

DM Policies - Valuing the Environment

Policy EN25 allocates sites for solar farm development and so this policy is considered further. These policies were consistently predicted to result in positive effects on IIA Objectives, regularly evaluated as being significantly positive, with no negative effects predicted. It is highly likely that these policies would help to ensure that new development in Flintshire is designed, managed, constructed, laid out, located and scaled in a way that helps to minimise risks to the natural environment whilst maximising opportunities for enhancing the environment. These policies were particularly predicted to result in significant positive effects on IIA Objectives related to protecting and enhancing biodiversity and landscapes/townscapes.

Table 6-2: Scores recorded for each Development Management Policy against each IIA Objective

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
Creating Sustainable Places and Communities DM Policies																		
PC1	0	0	0	0	+	0	0	+	0	+	+	0	0	0	+	0	+	0
PC2	++	0	+	+	+	+	+	+	0	+	+	+	+	+	++	0	0	0
PC3	++	0	++	+	+	0	0	0	0	++	++	++	0	+	0	0	0	0
PC4	+	0	+	+	0	0	0	0	0	++	++	+	+	++	+	++	+	0
PC5	+	0	+	0	++	+	+	+	0	0	0	0	0	0	++	0	0	0
PC6	+	+	+	0	+	+	+	+	0	0	0	0	0	0	++	0	0	0
PC7	0	+	0	0	+	+	+	+	0	0	0	0	0	0	++	0	0	0
PC8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PC9	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
PC10	0	0	0	0	+	0	+	+	+	-	-	0	0	0	+/-	0	0	0
PC11	0	+	0	0	+	+	++	++	0	+	+	0	+	0	+	0	0	0
PC12	0	++	+	0	+	++	0	+	+	0	0	0	0	0	0	0	0	0
Supporting a Prosperous Economy DM Policies																		
PE2	++	+	+	+	+	++	++	+	0	+	+	+	0	0	+	0	+	+
PE3	++	+	+	+	+	++	++	+	0	+	+	+	0	0	+	0	+	+
PE4	+	+	0	0	0	0	++	++	+	0	+	+	0	0	0	0	0	+
PE5	+	+	+	+	0	++	++	++	0	+	+	+	0	0	+	0	+	+
PE6	+	+	0	0	0	0	++	++	0	0	0	0	0	0	0	0	0	+
PE7	+	+	+	0	+/-	+	++	++	0	+	+	0	0	0	+	0	+	+
PE8	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
PE9	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
PE10	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
PE11	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
PE12	+	+	0	0	+	0	++	++	+	+	+	+	0	0	0	0	-	+
PE13	+	+	0	0	+	0	++	++	+	+	+	+	0	0	0	0	-	+
PE14	+	+	0	0	+	0	++	++	+	+	+	+	0	0	0	0	-	+
Meeting Housing Needs DM Policies																		
HN2	++	0	0	++	0	+	0	0	0	++	+	0	0	0	0	0	+	+
HN3	++	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	+
HN4	++	0	0	++	0	+	+	+	++	+/-	+	0	-	0	0	0	0	+
HN4-A	+	0	0	+	0	+	0	0	0	0	++	++	0	0	0	0	0	+
HN4-B	+	0	0	+	0	+	+	+	+	0	++	++	0	0	0	0	0	+
HN4-C	+	0	0	+	+	+	0	0	0	+/-	++	++	0	0	0	0	0	+
HN4-D	+	0	0	+	0	0	0	0	0	-	+	0	0	0	0	0	-	+
HN5	+	0	0	+	0	0	0	0	0	0	+	+	0	0	0	0	0	+
HN6	+	0	0	+	0	0	0	0	0	0	+	+	0	0	0	0	0	+
HN7	++	0	+	++	++	+	0	0	0	0	0	0	0	0	+	0	0	+
HN9	+	0	0	++	++	0	0	++	0	-	-	0	0	+	0	0	+	+
Valuing the Environment DM Policies																		
EN1	+	0	++	0	++	++	0	0	0	++	++	0	0	0	0	0	0	0
EN2	0	0	++	0	++	+	0	0	0	++	++	0	+	+	++	0	0	0
EN3	0	0	+	0	+	0	+	0	0	++	++	0	0	+	0	0	0	0
EN4	0	0	+	0	0	0	0	0	0	++	++	+	0	0	0	0	0	0
EN5	0	0	+	+	+	0	+	+	+	++	++	++	0	0	0	0	0	0
EN6	0	0	+	0	+	0	0	0	0	++	+	++	0	0	0	0	0	0
EN7	0	0	+	0	0	0	0	0	0	++	++	0	0	+	+	0	0	0

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
EN8	O	O	O	O	+	O	O	O	O	O	++	++	O	O	O	O	O	O
EN9	O	O	O	O	+	O	O	O	O	O	++	++	O	O	O	O	O	O
EN10	O	O	O	O	+	O	O	O	O	O	++	++	O	O	O	O	O	O
EN11	O	O	+	+	O	O	O	O	+	++	++	O	O	O	O	O	+	O
EN12	O	O	O	O	O	O	O	O	O	O	O	O	O	O	++	++	O	O
EN13	O	O	O	O	+	O	O	O	O	O	O	O	O	O	++	++	O	O
EN14	O	O	O	O	O	O	O	O	O	O	O	O	O	++	O	O	O	O
EN15	O	O	O	O	O	O	O	O	O	+	O	O	++	O	O	O	+	O
EN16	O	O	O	+	O	O	O	O	O	+	+	+	O	O	O	O	++	O
EN17	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	++	O
EN18	+	O	+	+	O	+	O	O	O	++	+	O	O	O	+	O	O	O
EN19	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	+	O
EN20	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O
EN21	O	O	O	O	O	+	+	+	O	+	+	+	O	O	O	O	O	O
EN22	O	O	O	+	O	+	+	+	O	O	+	+	O	O	O	O	+	O
EN23	O	O	O	+	O	+	+	+	O	O	O	O	O	O	O	O	+	O
EN24	O	O	O	O	O	O	+	+	O	O	O	O	O	O	O	O	+	O
EN26	O	O	-	+	O	+	+	+	O	+	+	+	O	O	O	O	+	O
EN27	O	O	O	+	O	+	+	+	O	O	+	O	O	O	+	O	+	O

6.4 Summary of recommendations for Development Management Policies

Mitigation involves putting in place measures to prevent, reduce or offset any identified adverse sustainability effects. Mitigation measures may also include recommendations for enhancing positive effects. The first priority should, however, be avoidance of adverse effects. Only when all alternatives that might avoid an adverse effect have been exhausted, should mitigation be sought to reduce the harmful effect. Alongside the assessments of development management policies recommendations have been made to help avoid or mitigate likely negative effects or to help enhance positive effects. These can be summarised as follows:

- New development could be encouraged to be laid out and designed in a manner that helps to combat the risk of crime, such as by facilitating high rates of natural surveillance;
- Walking and cycling routes could be incorporated into the wider GI network of the County and managed in a way that helps to maximise the benefits gained in terms of biodiversity, character, flood risk, climate change and air quality whilst also providing residents with a safe and attractive walking and cycling route. Walking and cycling routes should provide good access to community facilities, recreational spaces, retail, exercise opportunities and employment areas;
- Policies PC4, PC5, PC6 and PC7 could help to ensure residents live in areas of high quality whilst limiting rates of local traffic;
- New development should be considered for the extent to which it provides residents with walking and cycling access to key areas of employment;
- It is recommended that the Council consider the extent to which any development in rural locations caters for the need of internet users;
- When determining the extent to which a proposal harmonise with the character under PC2, is of a suitable design under PC3 or a suitable resilience under PC4, or provides necessary transport infrastructure under PC5, the Council could seek to maximise opportunities for ensuring new

developments incorporate GI of a type and layout that contributes towards a coherent GI network throughout the County, is well-managed to maximise the benefits it provides in terms of providing a safe and coherent wildlife corridor of high biodiversity value whilst increasing the total tree canopy in Flintshire;

- PC4 could potentially encourage the use of Sustainable Urban Drainage Systems and GI to help sustainable manage surface runoff and thereby reduce the risk of pollution or contamination of waterbodies;
- PC3 could require proposals to evidence the likely energy efficiency of development to help reduce the likely GHG emissions associated with new builds;
- Policies PC3 or PC4 could potentially require development proposals to evidence the likely energy efficiency of new builds. The Council should consider the possibility of moving towards carbon neutral homes towards the end of the LDP period or soon after;
- PC4 could require development proposals to show how the development would avoid or minimise the erosion, compaction or excavation of soils other than that which is absolutely necessary for the construction phase. Developers could be encouraged to adopt best practice in terms of sustainable soil management during the construction phase, as per guidance provided by NRW;
- The Council could potentially require proposals to demonstrate how new employment, retail or tourist development can be accessed by employees, customer or visitors via sustainable and efficient transport modes including walking, cycling and public transport;
- New development should demonstrate how good access to digital infrastructure and good internet speeds is provided for to reduce the need to travel by facilitating meetings and interactions online, particularly for development in rural locations. Ideally, access to digital infrastructure that is equipped to facilitate future technologies such as 5G would be provided;
- Proposals for development on greenfield land should be required to demonstrate how sustainable soil management technique would be employed during the construction phase in order to avoid any unnecessary erosion, compaction or excavation of soils. Where feasible, development should seek to make efficient uses of land in previously undeveloped locations; and
- It will become increasingly important to move towards carbon neutral development and this is something the Council could consider towards the end of the LDP period.

6.5 Assessments of Sites

The Deposit LDP (September 2019) proposes a range of sites in Flintshire to be allocated for various types of development in order to ensure that the County's development needs over the Plan period can be satisfied. In order to arrive at the list of sites proposed in the Deposit LDP (September 2019), the Council considered a range of alternative locations for development and have ultimately selected sites that would accommodate the required levels of development, are available, viable and deliverable whilst conforming with the LDP preferred strategy. The sustainability of each location has also been a key consideration for the Council when allocating sites for development. Table 6-3 sets out the range of sites allocated in the LDP, including the policies under which they are allocated, as well as the reasonable alternative locations considered by the Council. All site allocations and reasonable alternatives have been assessed in detail for their likely sustainability effects in Appendix E.

Table 6-3: Site allocations proposed in the Deposit LDP and reasonable alternatives

LDP Policy / site ref.	Location	Proposed/potential development
Allocated sites		
PC12.1	Community Centre, Woodlane	Community Facilities
PC12.2	Greenfield Cemetery	Community Facilities
PC12.3	Treuddyn Cemetery	Community Facilities
H1.1	Well Street	Housing
H1.2	Broad Oak holding, Mold Road	Housing
H1.3	Highmere Drive, Connah's Quay	Housing
H1.4	Northop Road	Housing
H1.5	Maes Gwern	Housing

LDP Policy / site ref.	Location	Proposed/potential development
H1.6	Land between Denbigh Road and Gwernaffield Road	Housing
H1.7	Holywell Road / Green Lane	Housing
H1.8	Ash Lane	Housing
H1.9	Wrexham Road	Housing
H1.10	Cae Isa, A5119	Housing
H1.11	Chester Road	Housing
HN8.1	Magazine Lane	Gypsy and Traveller Sites
HN8.2	Gwern Lane	Gypsy and Traveller Sites
HN8.3	Riverside Park	Gypsy and Traveller Sites
HN8.4	Castle Park	Gypsy and Traveller Sites
EN25.1	Hendre Quarry	Minerals Development
EN25.2	Pant y Pwll Dwr Quarry	Minerals Development
EN25.3	Ddol Uchaf Quarry	Minerals Development
EN25.4	Fron Haul Quarry	Minerals Development
PE1.1	Manor Lane, Chester Aerospace Park	Employment
PE1.2	Manor Lane, Hawarden Park Extension	Employment
PE1.3	Drury New Road	Employment
PE1.4	Greenfield Business Park Phase II	Employment
PE1.5	Greenfield Business Park Phase III	Employment
PE1.6	Broncoed Industrial Estate	Employment
PE1.7	Mold Business Park	Employment
PE1.8	Adjacent Mostyn Docks	Employment
PE1.9	Chester Road East	Employment
PE1.10	Antelope Industrial Estate	Employment
PE1.11	River Lane	Employment
PE1.12	Rowley's Drive	Employment
STR3A	Northern Gateway Mixed Use Development Site	Mixed use strategic site
STR3B	Warren Hall Mixed Use Development Site	Mixed use strategic site
EN13.1	Crump's Yard, Dock Road	Solar Farms
EN13.2	Castle Park	Solar Farms
Reasonable alternative locations for development		
BUC022/035	Adj Catheralls Ind Est	Housing
DRU001	Bank Lane Holding (Land west of Bank Lane)	Housing
HOL017	Land South of Ffordd Beuno, Holway	Housing
HOL024-AS	Land North of A5026 / West of Ffordd Beuno, Holway	Housing
MOL047 & 046	Land South of Gwernaffield Road	Housing
MOL017	County Hall	Housing
BROU001	Bretton Road	Housing
GRE002	Tan Y Felin	Housing
HCAC025	Pool House, Denbigh Rd/West of Beechwood Close	Housing
CAE006	North of Summerhill Farm	Housing
BUC030/037	Chester Road / Bannel Lane	Housing
DRU009	Woodside Cottage, Bank Lane	Housing
LEE004	Side/Rear Wesley Methodist Church, King Street	Housing
MOS002	Ffordd Pennant	Housing
NEW003	Land Between Moorcroft and A494(T)	Housing
NEW001	Land East of Haven Green, A5119	Housing
BAG014	Former Canton Depot	Housing
NEWSITE	Bedol Farm	Housing
NEWSITE	East of Drury New Road	Housing
NH020	Land South of Wellfield Farm, Village	Housing
PEN037	Land North of Wood Lane Farm	Housing
SYCH022	Land North East of the Vownog Cottage	Housing
NEWSITE	Halkyn Road	Housing
COE005	Former Clwyd Alloys	Housing
LEE007	Southern Part of Former Laura Ashley Site	Housing

6.6 Justification for the Preferred Allocations

The Council's process of identifying sites available for development and selecting their preferred options from these has been a lengthy, thorough and robust process supported by numerous studies and evidence documents as well as consultation with stakeholders at key stages. The Council have prepared a background paper for the Deposit LDP titled 'Background Paper 8: Assessment of Candidate and Alternative Sites' which provides a clear and proportionate justification for the Council's selection of allocated housing sites in light of the reasonable alternatives dealt with. Generally speaking, the Council have sought to allocate sites that comply with the LDP strategy and which have clear sustainability benefits.

The Council have considered that reasonable alternative sites for other types of development were not available for consideration.

6.7 Summary of Site Allocations Assessments

Housing sites

The assessments of housing site allocations identified a range of effects. A limited number of the residential site allocations coincide with land at risk of flooding and so careful siting of the development could be required to ensure new homes are not situated within an incompatible level of flood risk. Many of the sites, particularly those in Local Service Centres and Sustainable Villages, are in proximity to natural waterbodies and so there could be a risk of new construction and occupation posing a risk to water quality in some locations.

Minor negative effects on most natural environment objectives couldn't be ruled out in many cases. The construction and occupation of new homes would be likely to result in an increase in the consumption of natural resources in relation to existing levels, including water and air. Many of the sites are greenfield and so new development in these locations would be likely to result in the loss of soils whilst posing a risk to local ecological connectivity, the character of the surrounding area and the setting of nearby heritage assets.

The allocation of these sites would help to ensure that the varied housing needs of Flintshire's growing population over the Plan period could be satisfied. The location of the housing sites generally could help to ensure that new residents would have good or excellent access to key services, amenities and spaces including schools, health centres, employment areas, community centres, retail areas and recreational opportunities.

The scores recorded for each housing allocation against each IIA Objective are presented in Table 6-4.

Table 6-4: Scores recorded for each housing site allocation against each IIA Objective

Policy / Site ref.	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
H1.1	0	+	+	++	+	++	0	++	0	-	-	-	-	-	-	-	-	+
H1.2	-	+	+	+	+	++	0	++	0	-	-	0	-	0	-	-	-	+
H1.3	-	++	+	++	-	++	0	++	0	-	-	0	0	0	-	-	-	+
H1.4	0	++	+	++	-	++	0	++	0	-	-	-	-	-	-	-	-	+
H1.5	0	++	++	++	++	++	0	++	0	-	-	-	-	0	-	-	-	++
H1.6	-	+	+	++	+	-	0	++	0	-	-	-	-	0	-	-	-	++
H1.7	0	+/-	-	++	-	++	0	++	0	-	-	0	-	-	-	-	-	+
H1.8	0	+/-	++	++	+	-	0	+	0	-	-	-	-	-	-	-	-	+
H1.9	0	++	+	+	++	-	0	+	0	-	-	-	-	-	-	-	-	+
H1.10	0	+	++	++	++	-	0	+	0	-	-	-	-	-	-	-	-	+

Policy / Site ref.	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
H1.11	0	++	+	++	-	++	0	+	0	-	-	0	-	0	-	-	-	+
Reasonable alternative sites																		
BUC22/035	-	++	+	++	-	++	0	++	0	-	-	0	-	-	-	-	-	+
HOL017	-	+	++	+	-	-	0	0	0	-	-	-	-	-	-	-	-	++
HOL024-AS	0	+	+	++	-	-	0	0	0	-	-	-	-	-	-	-	-	+
MOL047&46	0	+	++	++	+	++	0	++	0	-	-	-	0	-	-	-	-	++
MOL017	0	0	+	++	++	-	0	++	0	-	0	-	-	-	-	-	-	++
BROU001	-	+	+	++	-	-	0	+	0	-	-	0	-	-	-	-	-	+
GRE002	-	+	++	++	-	++	0	0	0	-	-	-	-	-	-	-	-	+
HCAC025	0	++	++	+	-	++	0	0	0	-	-	-	0	0	-	-	-	+
CAE006	0	++	+	+	++	++	0	+	0	-	-	-	0	0	-	-	-	+
BUC030/037	-	+	++	++	-	-	0	++	0	-	-	0	-	0	-	-	-	+
DRU001	0	++	+	+	-	++	0	+	0	-	-	0	0	0	-	-	-	+
DRU009	0	+	+	+	++	++	0	+	0	-	-	0	0	-	-	-	-	+
LEE004	0	++	++	+	+	++	0	+	0	-	-	0	-	0	-	-	-	+
MOS002	-	++	+	+	-	++	0	+	0	-	-	0	-	0	-	-	-	+
NEW003	0	++	+	+	+	-	0	+	0	-	-	-	0	-	-	-	-	+
NEW001	0	++	+	+	+	-	0	+	0	-	-	-	0	0	-	-	-	+
BAG014	0	+	+	+	-	++	0	++	0	-	0	0	-	-	-	-	-	+
Bedol Farm	0	+	+	++	-	++	0	++	0	-	-	0	0	0	-	-	-	+
E.Dr. N. Rd	0	++	+	++	-	++	0	+	0	-	-	0	-	-	-	-	-	+
NH020	0	++	++	+	++	++	0	+	0	-	-	0	-	-	-	-	-	+
PEN037	0	++	++	++	-	-	0	+	0	-	-	0	-	-	-	-	-	+
SYCH022	0	++	+	+	-	++	0	+	0	-	-	0	-	0	-	-	-	+
Halkyn Rd.	0	++	+	++	+	++	0	++	0	-	-	-	-	-	-	-	-	+
COE005	0	0	+	+	+	-	0	0	0	-	+	0	-	-	-	-	-	+

Employment

The proposed employment site allocations in the Flintshire LDP are generally in highly accessible locations and would be expected to make a major contribution towards ensuring that employment needs in the County over the Plan period can be satisfied. The local economy would be expected to significantly benefit from each site due to the provision of new land for new and expanding businesses to operate and succeed. The provision of new employment opportunities would be likely to contribute towards reducing crime rates in Flintshire whilst enhancing the range of skills learning opportunities for local people.

Many of the employment sites are within high flood risk areas and careful siting of development could be required to ensure new development avoids flood risk with which it is incompatible. In some locations of Flintshire new employment development could potentially pose a risk to the local character, although this is partly dependent on details of the design and layout of such development. New employment development would also be likely to lead to an increase in emissions, energy and resource consumption associated with business operations.

The scores recorded for each employment allocation against each IIA Objective are presented in Table 6-5.

Table 6-5: Scores recorded for each employment site allocation against each IIA Objective

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
PE1.1	+	+	O	O	-	+	++	++	O	-	-	O	-	+	-	-	-	O
PE1.2	+	+	O	O	-	+	++	++	O	-	-	O	-	+	-	-	-	O
PE1.3	+	+	O	O	++	+	++	++	O	+	-	O	-	-	-	-	-	O
PE1.4	+	+	O	O	+	+	++	++	O	+	-	-	-	+	-	-	-	O
PE1.5	+	+	O	O	+	+	++	++	O	+	-	O	-	-	-	-	-	O
PE1.6	+	+	O	O	+	+	++	++	O	O	+	O	-	+	-	-	-	O
PE1.7	+	+	O	O	-	+	++	++	O	-	-	-	-	-	-	-	-	O
PE1.8	+	+	O	O	+	+	++	++	O	+	-	O	-	+	-	-	-	O
PE1.9	+	+	O	O	++	+	++	++	O	-	-	-	-	+	-	-	-	O
PE1.10	+	+	O	O	+	+	++	++	O	-	-	-	-	+	-	-	-	O
PE1.11	+	+	O	O	+	+	++	++	O	+	-	O	-	O	-	-	-	O
PE1.12	+	+	O	O	++	+	++	++	O	-	-	O	-	+	-	-	-	O

Mixed-use strategic sites

The Deposit LDP (September 2019) allocates to strategic sites for mixed-use development through Policy STR3. Both sites would make a significant contribution towards satisfying Flintshire's growing and varied housing and employment needs and could make a major boost to the local economy.

Given the size of these sites, and that a large portion of both sites is greenfield, there is a risk of negative effects on natural environment objectives but particularly natural resources given the likely significant losses of ecologically and agriculturally important soils. STR3b is in proximity to natural waterbodies and contains land at a high risk of flooding. These are expected to be incorporated into a small wooded area as part of the site's GI strategy and so potential adverse impacts on water quality or flood risk are likely to be minor. STR3A is in an area of high crime levels and so could expose new site users to a higher risk of crime than other areas of Flintshire. At the same time, the proposed development could help to reduce local rates of employment, deprivation and homeless and subsequently contribute towards a reduction in crime.

Scores recorded against each IIA Objective for both mixed-use sites are presented in Table 6-6.

Table 6-6: Scores recorded for each mixed-use strategic site allocation against each IIA Objective

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
STR3A	+/-	++	+	++	++	-	++	++	O	-	-	-	-	-	-	-	+	O
STR3B	O	-	+	++	+	-	++	++	O	-	-	-	-	+	-	-	+	O

Community Facilities

Given the nature of community facilities, effects on most IIA Objectives are expected to be neutral or negligible. The provision of these facilities, which are generally in accessible locations, would be likely to deliver benefits to the local community and could help to reduce the risk of crime or anti-social behaviour. Each site could potentially pose a minor risk to the local ecological connectivity and landscape/townscape character. The scores recorded for each community facilities allocation for each IIA Objective are presented in Table 6-7.

Table 6-7: Scores recorded for community facility site allocations against each IIA Objective

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
PC12.1	+	0	0	0	+	++	0	0	0	-	-	0	0	0	0	0	0	0
PC12.2	+	0	0	0	+	++	0	0	0	-	-	0	0	0	0	0	0	0
PC12.3	+	0	0	0	+	++	0	0	0	-	-	0	0	0	0	0	0	0

Gypsy and Traveller Sites

The proposed Gypsy and Traveller site allocations in the Deposit LDP (September 2019) would help to ensure that the needs of the gypsy, traveller and travelling showpeople community in Flintshire are satisfied over the Plan period. These sites are generally in highly accessible locations and would provide site users with good access to key services amenities and facilities. It is unclear if amenity blocks and waste management facilities would be provided to reduce fly tipping and potential watercourse issues from foul water drainage if not connected to the mains. Due to the nature of the location of these sites, which are typically adjacent to or on semi-natural habitats and greenfield, the proposed site development could also lead to a very minor increase in the consumption of energy, resources and water in relation to existing levels. The scores recorded for each site against each IIA Objective are presented in Table 6-8.

Table 6-8: Scores recorded for each gypsy and traveller site allocation against each IIA Objective

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
HN8-1	0	-	+	+	-	++	0	+	0	-	-	0	-	0	-	-	-	0
HN8-2	0	-	++	+	+	++	0	+	0	-	-	0	-	0	-	-	-	0
HN8-3	0	+	+	+	++	++	0	+	0	-	-	0	-	0	-	-	-	0
HN8-4	0	+	+	+	+	+	0	+	0	-	-	0	-	0	-	-	-	0

Minerals Development

Policy EN25 allocates four mineral site extensions. These could provide a major boost to employment opportunities in this industry and could help to deliver major economic gains to Flintshire. It could also provide new skills-learning opportunities to local people. New minerals would also increase the local supply of materials for building homes. The sites are generally situated away from residential communities and thus community cohesion should be preserved. There is a risk that the expansion of these facilities could lead to an increase in the energy consumption and emissions associated with each site, as well as the quality of natural waterbodies in proximity to the mineral resources. The scores recorded for each site against each IIA Objective are presented in Table 6-9.

Table 6-9: Scores recorded for each mineral development allocation against each IIA Objective

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
EN25-1	0	+	0	+	0	+	++	++	0	0	0	0	-	0	-	-	+	0
EN25-2	0	+	0	+	0	+	++	++	0	0	0	0	-	0	-	-	+	0
EN25-3	0	+	0	+	0	-	++	++	0	-	-	0	-	0	-	-	-	0
EN25-4	0	+	0	+	0	+	++	++	0	0	0	0	-	0	-	-	+	0

Solar Farms Development

Policy EN13 allocates two sites for solar farm development. Both sites could help to make a meaningful contribution towards renewable energy generation in Flintshire, which in turn could help to facilitate a more sustainable local economy as well as lowered emissions. Given their proximity to European designated sites at the Dee Estuary there could potentially be a minor risk of indirect negative effects on biodiversity, although the HRA has ruled out any significant effects and it is expected that a combination of screening vegetation and best-practice measures being adopted during construction make contamination of the water unlikely. The scores recorded for each site against each IIA Objective are presented in Table 6-10.

Table 6-10: Scores recorded for each mineral development allocation against each IIA Objective

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
EN13-1	O	O	O	O	O	O	+	O	O	-	O	O	O	O	+	++	O	O
EN13-2	O	O	O	O	O	O	+	O	O	-	O	O	O	O	+	++	O	O

6.8 Summary of recommendations for site allocations

A wide range of recommendations have been made in the SA alongside the assessments, as summarised in Table 6-11.

Table 6-11: Summary of measures recommended for each IIA Objective for site allocations to help avoid or mitigate negative effects or to enhance positive effects

IIA Objective		Summary of Recommendations
1	Crime	Where development would be situated within areas of relatively high crime rates, proposals should demonstrate that the design of the development incorporates measures for reducing the risk and fear of crime and minimises opportunities for anti-social behaviour, such as by creating natural surveillance, providing safe and secure storage spaces for bicycles or providing a well-lit public realm.
2	Education	New residential development should only take place when adequate local school capacity has been demonstrated. Where new residential development would place pressure on the capacity of local schools, additional provision should be agreed, prior to development being approved. Where necessary, contributions from developers towards the expansion of schools could be considered. All new residential development should encourage walking and cycling and ensure safe and convenient walking and cycling access to primary and secondary schools.
3	Health	New residential development proposals should demonstrate a provision of adequate space, outdoor amenity space and access to communal open spaces as well as a diverse range of natural habitats. All new residential developments should enable and encourage walking and cycling and provide safe and convenient walking and cycling access to a nearby GP surgery.
5	Access	Some sites allocated for development are in proximity to, or adjacent to, the PRoW network. At some sites, a PRoW runs through the site. In such cases, development proposals should demonstrate that the capacity, function and quality of the PRoW is not diminished during the construction or operation phases of the proposed development.
6	Strong & cohesive communities	New residential development proposals should demonstrate that new residents would have appropriate access to community facilities. The development should provide appropriate levels of outdoor amenity space and communal areas that facilitate interactions and socialisation between members of the community.
8	Employment	All new residential development should enable and encourage walking and cycling that would provide safe and convenient walking and cycling access to key employment areas.

IIIA Objective		Summary of Recommendations
9	Quality of life in rural areas	Where new development takes place in rural locations it should be demonstrated that site users would have good access to the internet.
10	Biodiversity	<p>Many of the new sites allocated for development are greenfield sites that could potentially be of a high biodiversity value or could be supporting priority and protected species and habitats. Appropriate ecological surveys should be conducted prior to development starting and, where appropriate, appropriate measures taken to ensure protected species are not adversely impacted.</p> <p>At sites containing existing green infrastructure and wildlife elements, such as hedgerows, mature trees or small ponds, including those delineating site perimeters, these should be preserved and protected from negative impacts caused by new development. Where the removal of trees, hedgerow or other habitat is necessary for development to proceed these should be replaced by similar wildlife features of a similar quantity, quality and composition nearby. This is not only to attempt to secure the protection and, preferably, enhancement of the site's biodiversity value but to preserve the connectivity of the wider ecological network and to prevent habitats being cut off or isolated from the network.</p>
11	Landscape / Townscape	<p>Where sites contain existing green infrastructure elements, such as trees or hedgerow, that make a meaningful contribution to the local character it has been recommended that these are preserved as much as possible and supported by the provision of additional GI elements.</p> <p>Development proposals should demonstrate that, when they are situated within or adjacent to existing communities, they respect the local character and if appropriate adopt vernacular architecture in order to preserve and preferably enhance the local townscape or landscape character.</p>
12	Heritage	<p>In some cases site locations are relatively close, such as within 300m, of Scheduled Monuments (e.g. Bryn y Cwm, a large earthwork motte and partially surviving counterscarp bank) and it may therefore be appropriate to ensure that archaeological surveys of the site are completed prior to development taking place.</p> <p>Archaeological surveys could potentially be required to help ensure that below ground archaeology is not harmed as a result of the proposed development.</p> <p>Design that accords with the existing local townscape and local sense of place, in addition to the incorporation of green infrastructure into development, would be likely to help ensure that the impacts of new development on greenfield or brownfield sites on the setting as well as the views of and from and on the setting of heritage assets, such as Listed Buildings, are avoided or minimised.</p>
13	Water resources	Where sites are within 100m of, adjacent to or contain waterbodies careful consideration should be given to the potential impacts of the proposed development on the quality of the nearby waterbody. Dust or other contaminants entering the waterbody through surface runoff should be prevented and the local water table should remain unaltered by development.
14	Flood risk	<p>Where sites contain a relatively small area of land at a High risk of surface water flooding, a careful layout of the proposed development could ensure that this flood risk is avoided.</p> <p>Where GI is within or delineates sites it should be preserved. New GI provided within developments should seek to be positioned in a way that maximises its flood risk alleviation potential (where flood risk is present).</p>
15	Air quality & GHGs	<p>All new residential development should enable and encourage walking and cycling and provide safe and convenient walking and cycling access to key services, amenities and facilities.</p> <p>Low or zero emission vehicles should be encouraged during construction and site use.</p> <p>New residential development should be encouraged to provide electric car charging infrastructure.</p>
16	Efficient & renewable energy	<p>It may be appropriate to use a Development Brief some of the larger site allocations.</p> <p>A Design and Access Statement is a Welsh Government requirement for most planning applications in Wales. This would include an explanation of sustainable design, proportionate to the scale and type of development proposed. This should include the likely energy consumption of the proposed development during construction and operation and to identify and seek out opportunities for improving energy efficiency and employing low and zero carbon technologies.</p>

IIIA Objective		Summary of Recommendations
17	Natural resources	Promote the use of recycled/ reused materials in order to decrease the demand on raw materials during construction and provide on-site waste separation facilities wherever possible. Promote sustainable management soils during construction and re-use excavated soils where feasible.

6.9 Cumulative and synergistic effects

The assessments of site allocations in the appendices consider the cumulative effects of allocations on a settlement by settlement basis. The purpose of this section is to predict and evaluate the likely cumulative and synergistic effects of all policies and site allocations in the Deposit LDP in-combination (see Table 6-12).

SEA Directive Annex I

(f) the likely significant effects... (footnote) these effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

SEA Directive Annex II

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to... the cumulative nature of the effects.

Table 6-12: Cumulative and synergistic effects of all policies and site allocations in the Deposit LDP (September 2019) in-combination

IIA Objective	Overall score	Description of effects
1 Crime	+	Development proposed in the Deposit LDP would be expected to make a major synergistic contribution towards reducing rates of homelessness, unemployment, poverty, deprivation and inequality. In so doing, it is likely that it would make a meaningful contribution towards combatting crime in Flintshire. Policies in the LDP seek to ensure that new development is also designed in a way that reduces the risk of crime, such as through high rates of natural surveillance. Much of the proposed development is situated on greenfield land in areas with relatively high crime rates. New development in these locations could potentially have the greatest cumulative impact in combatting crime rates, through creating employment, providing high quality developments and improving natural surveillance, and engendering a sense of community pride through regeneration, but at the same time could also introduce new targets of crime to the area.
2 Education	++	The LDP would be expected to situate the majority of new residents in locations where they have excellent cumulative access to education opportunities. The provision of new employment land would also help to improve opportunities for learning. In some locations it is likely that the capacity of education facilities would be expanded. This is tempered to some extent by a risk of the capacity of some schools being placed under additional pressure due to new development, although, in line with LDP policies, it is expected that new residential development will only take place when adequate local school capacity has been demonstrated. Overall, sites and policies in the LDP would be likely to result in a major positive synergistic effect on this IIA Objective.
3 Health	++	Policies in the LDP would be expected to provide a major positive synergistic contribution towards improving the physical and mental health and wellbeing of local people. The significant provision of homes and jobs would reduce local rates of homelessness, unemployment, poverty, deprivation and inequality with resulting benefits to people's physical and mental health. Due to the location of site allocations, new and existing residents would be expected to have good access to health facilities, including hospitals and GP surgeries; recreational facilities, as well as exercise opportunities, social spaces and a diverse range of semi-natural habitats.
4 Housing	++	The LDP would be expected to help ensure that the growing and varied housing needs of Flintshire's diverse community are catered for over the Plan period. A major positive cumulative effect on this IIA Objective would be highly likely.
5 Access	++	Strategic and development management policies would require proposals to demonstrate that site users of new development have good accessibility via walking, cycling and public transport modes. The proposed site allocations are situated in

IIA Objective	Overall score	Description of effects
		locations which, for the most part, are within a short distance of key services and amenities including community buildings, recreational opportunities, employment areas and retail areas, which could lead to significant positive cumulative effects.
6 Communities	++	Strategic and development management policies would be likely to synergistically and cumulatively help ensure that the cohesiveness of communities across Flintshire is protected and enhanced. New development is predominantly directed towards areas of existing similar built form, with new residents likely to be living amongst an existing community and employment uses directed towards business or industrial areas. The capacity and quality of existing community facilities are protected whilst three new community facilities have been allocated. Overall, the LDP would be expected to make a major positive synergistic contribution towards improving the cohesiveness of communities across Flintshire.
7 Economy	++	The LDP sets out strategic and development management policies that would be expected to help synergistically and cumulatively enhance the sustainability and diversity of Flintshire's economy by providing support and encouragement for particular types of businesses that are key to local economic growth. New employment sites allocated for certain uses, such as B2 office-use, would provide a boost to the local economy. Their location versus the location of new residential allocations helps to ensure that businesses and retail spaces have good access to customers and employees. It is likely that improvements to local educational attainment as well as Flintshire's digital infrastructure would also benefit the local economy. Overall, the LDP would be highly likely to result in a major positive synergistic impact on Flintshire's economy.
8 Employment	++	The LDP allocates a range of employment sites, whilst also supporting and encouraging new employment development in existing business and industrial locations and would therefore be expected to cumulatively ensure that local rates of unemployment decreases whilst people are afforded greater access to a broader range of high-quality jobs. Improved educational attainment would also improve the employability of Flintshire's residents and so a major positive synergistic impact on employment in Flintshire would be likely.
9 Rural life	++	The distribution of new residential and employment development would be expected to cumulatively help enhance the vitality of rural communities throughout Flintshire whilst not exceeding the capacity of these places to accommodate new development.
10 Biodiversity	-	Development management and strategic policies would be likely to act in synergy when helping to ensure that biodiversity in Flintshire is protected and enhanced, including the wildlife found across the county and its overall ecological connectivity. It is expected that in many cases new development would avoid negative effects on biodiversity as a result of these policies. Where development has been proposed on brownfield sites there is the potential for development to realise a local net gain in biodiversity. However, the majority of new site allocations would result in the loss of significant quantities of greenfield land and would be likely to cumulatively result in a loss of sensitive habitats or supporting habitats in some locations. In some areas of Flintshire it is likely that ecological connectivity would be diminished and there is a risk of habitats becoming cut off and isolated from the network.
11 Landscape	-	Strategic and development management policies would be likely to synergistically help ensure that new development in Flintshire is of a high quality and visually attractive design that respects the local character and is in-keeping with the local form. In some cases new development is potentially an opportunity to enhance the local character. However, the majority of new development would be on greenfield sites that results in the loss of open spaces and GI elements that play an important role in defining the local character. Whilst the development would be of a high quality design, alternations and potentially negative impacts on the landscape character in rural settlements or edge of settlements throughout Flintshire cannot be ruled out. Site allocations are often adjacent to, or within, areas of similar built form and this may cumulatively help to avoid or mitigate negative impacts in many cases.
12 Heritage	-	Development management and strategic policies in the LDP are designed to ensure that the rich cultural heritage of Flintshire is preserved and enhanced and that new development avoids or mitigates negative impacts as much as possible. These policies would be likely to work in synergy when achieving this effect. This would largely be achieved through requiring development to be designed, laid out and positioned in a manner that respects the local setting. However, as with IIA Objective 11, negative impacts cannot be ruled out primarily due to the cumulative loss of open space and greenfield land that alters the views of and from heritage assets such as Listed Buildings.

IIA Objective	Overall score	Description of effects
13 Water	-	Development management and strategic policies in the LDP seek to ensure that new development in Flintshire is relatively water efficient whilst also avoiding negative impacts on natural waterbodies. The policies would be likely to synergistically help enhance the efficiency of water consumption in Flintshire over time. However, given the cumulative scale of development being pursued a net increase in total water consumption in Flintshire is likely. Sites allocated for new development are often in rural locations within 100m of natural waterbodies or near the coastline. Development in these locations would make achieving water quality improvement targets more difficult due to the cumulatively increased risk of contamination or pollution from surface waters as a result of greenfield land (which provide natural water filtering services) being replaced with hard standing.
14 Flooding	-	Policies in the LDP seek to ensure that no new development in Flintshire increases the risk of flooding faced by local people and buildings. However, there are extensive flood risk areas in the county and it has not been possible to always allocate sites away from land at risk of flooding, particularly employment sites, of which several are on land a high risk of flooding (although employment use is compatible with a higher risk of flooding than residential use). The majority of allocated sites are currently greenfield and cumulatively replacing permeable soils with hard standing could to some extent alter the characteristics of overland flow of surface waters. This would to some extent be avoided or mitigated by policies requiring proposals to incorporate sustainable drainage systems into development, avoiding areas of high flood risk within sites themselves from built development, as well as the protection of green spaces in some areas, but an overall minor negative synergistic impact on this IIA Objective cannot be ruled out.
15 Air quality and GHGs	-	The LDP sets out various policies that would be likely to synergistically encourage higher rates of walking, cycling and public transport uptake. It also encourages more energy efficient buildings, improved access to electric vehicle charging infrastructure and increased generation of renewable energy. The LDP allocates two new sites for solar farm developments. In addition, most new sites allocated for residential or employment development facilitate relatively efficient movements for local people with only short journeys required to access key services, amenities and employment areas. However, the scale of the development proposed in the LDP, including the significant growth in housing and employment development, would be expected to cumulatively lead to a net increase in energy consumption and congestion in Flintshire that results in an overall minor negative impact on air quality and carbon dioxide emissions.
16 Energy	-	
17 Natural resources	-	The scale and distribution of development sought through the LDP would be expected to lead to a cumulative, significant, permanent and irreversible net loss of soils throughout Flintshire. This would be synergistically mitigated to some extent by policies seeking to ensure that development makes a relatively efficient use of land; that valuable mineral areas are safeguarded and that fields and open spare are protected as well as due to national policy that requires the best and most versatile agricultural soils to be protected from development. It is likely that the increase in local construction and the number of households and businesses would cumulatively increase local rates of the consumption of materials and the amount of waste sent to landfill. Several development management policies would be expected to help enhance the efficiency of Flintshire's waste management system and could encourage higher rates of reduce, reuse and recycle, but are unlikely to entirely prevent an overall net increase in materials consumption and waste generation.
18 Welsh language	+	A key Objective of the LDP is to protect and support the Welsh Language. This has been carried through to Policy STR4 on the Principles of Sustainable Development, Design and Placemaking i.e. new development must ensure that it supports and sustains the long-term wellbeing of the Welsh language. New sites allocated for development in the LDP, for the most part, would cumulatively provide new residents with access to Welsh-language learning opportunities at schools. Some sites are within proximity to Welsh medium schools. New development is situated within a range of communities, with differing levels of Welsh speaking. Where the rate of Welsh speaking is relatively high there could be a risk of new residents diluting these rates or, alternatively, it could be an effective means of encouraging a greater uptake. It is generally considered that no single community or settlement would be subject to development of a scale that could discernibly dilute rates of Welsh speaking.

6.11 Summary of the HRA Process

Separate to the IIA, an HRA Screening of the LDP has also been carried out by Arcadis on behalf of the Council to determine if any policies or site allocations in the LDP, whether alone or when considered cumulatively, could potentially result in a likely significant effect (LSE) on a European site.

The Habitat Directive requires HRA to follow four distinct stages:

1. **Stage 1: Screening** is the process which initially identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans and considers whether these impacts may have a significant effect on the integrity of the site's qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made. The April 2018 CJEU judgement determined that mitigation to avoid or reduce harmful effects of the plan or project on a European site cannot be taken into account at the screening stage (Stage 1). Where such measures are required, a plan or project will require Appropriate Assessment to be undertaken (Stage 2).
2. **Stage 2: Appropriate Assessment** is the detailed consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
3. **Stage 3: Assessment of alternative solutions** is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.
4. **Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain.** At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the Natura 2000 network.

A critical part of the HRA screening process is determining whether or not the proposals are likely to have a significant effect on European sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance and also its conservation objectives. In considering whether the project is likely to have a significant effect on a European site, a precautionary approach must be adopted:

- The project should be considered 'likely' to have such an effect if the applicant is unable (on the basis of objective information) to exclude the possibility that the project could have significant effects on any European site, either alone or in combination with other plans or projects.
- An effect will be 'significant' in this context if it could undermine the site's conservation objectives. The assessment of that risk must be made in the light of factors such as the characteristics and specific environmental conditions of the European site in question.

The HRA identified 23 European sites within 20km of Flintshire. Where there was no link or conceivable impact pathway between the LDP and the European site, these European sites were screened out of the assessment. This left five European sites under consideration, including Dee Estuary SAC, SPA and Ramsar Site, River Dee and Bala Lake SAC and Deeside and Buckley Newt SAC.

Each European site has known vulnerabilities and pressures that, if exacerbated, could lead to an LSE. The HRA carried out a detailed screening exercise to determine if any proposals in the LDP, including

policies or site allocations, could result in an LSE on any of these five European sites either alone or in combination via the sites' known vulnerabilities and pressures, which in the case of the five sites under consideration includes the impact pathways of air quality, water quality, loss of functionally linked habitat, disturbance/displacement and recreational disturbance. The HRA considered that the impact pathways of air quality and loss of functionally linked habitat could be screened out from further consideration as the LDP would clearly not result in these impacts. Following the detailed screening, the HRA also concluded that an LSE on the five European sites arising from impacts related to water quality, disturbance/displacement and recreational disturbance could be objectively ruled out.

In summary, the HRA has objectively ruled out an LSE on any European site and thus the Appropriate Assessment stage is unwarranted. In accordance with the findings of the HRA process, the assessments in this SA have not identified a significant negative impact of any proposal in the LDP as a result of significant effects on a European site.

6.12 Equalities

During the assessments of strategic options, policies and site allocations the consideration of impacts on equality has been factored into a range of IIA Objectives, particularly those related to health, communities and safety. The assessments have identified, where appropriate, potential impacts on people with characteristics protected under the Equalities Act in Flintshire's community.

Policies and site allocations in the LDP would be expected to make a meaningful contribution towards advancing the equality of opportunity for people in Flintshire, with those most in need likely to have greater access to a broader range of high-quality jobs as well as key services and amenities. The LDP directs new residential development towards existing communities in a manner that could help to foster more diverse and integrated communities without exceeding the capacity of these communities for accommodating new development and, in so doing, this would help to foster good relations between people who share protected characteristics as well as those who do not. Enhancements to walking and cycling routes as well as public transport would be expected to benefit those with protected characteristics and those without.

6.13 Health

The health of people in Flintshire has been an integral consideration of the LDP and this IIA. All options being considered for inclusion in the LDP have been assessed in this IIA in order to predict and evaluate their likely impacts on the IIA Objective of improving the physical and mental health and wellbeing for all people whilst reducing health inequalities. Where options would help to improve residents' access to health and social care services (particularly in more isolated areas), reduce health inequalities, promote healthy lifestyles and/or facilitate stronger and more cohesive communities then they would be highly likely to make a positive contribution towards the health Objective. The assessment results presented in this IIA report show that, for the significant majority of options, these positive impacts have been predicted. The summary of assessment results for residential allocations in Table 6-4 shows that nearly all sites would have at least a minor positive impact on the health objective, with many being likely to have a major positive impact.

Most IIA Objectives indirectly relate to the health and wellbeing. For example, achieving a reduction in the risk and fear of crime, delivering new and high-quality homes, improving the accessibility of amenities and services, creating jobs, improving the cohesiveness of communities and the quality of life in rural areas, protecting biodiversity assets, heritage assets and natural landscapes, reducing the risk of flooding, improving water quality and reducing air pollution would all make a major contribution towards improving the physical and mental health and wellbeing of people in Flintshire. The cumulative effects assessment in Table 6-12 shows that, overall, the LDP would be likely to result in a cumulative major impact on the health IIA Objective.

7. IIA Monitoring Framework

7.1 Introduction

This section provides an outline of how the proposed framework for monitoring the significant effects, both positive and negative, of implementing the plan will be developed as the LDP is developed. Monitoring is an ongoing process integral to the plan's implementation and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the IIA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

The SEA Regulations require that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any unforeseen, undesirable, environmental effects are identified, and remedial action is implemented accordingly. Likewise, it is beneficial to check that the effects (including beneficial ones) occur as predicted by the IIA.

Based on the assessment conducted on the Options and identification of potential significant environmental effects, a proposed Monitoring Framework has been drafted. Monitoring will be undertaken following adoption of the LDP and should be linked back to Flintshire's own Annual Performance Report²⁰.

7.2 Approach

The proposed Monitoring Framework will be developed to measure the performance of the plan against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:

- The objectives, targets and indicators that were developed for the IIA Framework;
- Features of the baseline that will indicate the effects of the plan;
- The likely significant effects that were identified during the assessment; and
- The mitigation measures that were proposed to offset or reduce significant adverse effects.

The Monitoring Framework will be designed to focus mainly on significant sustainability effects including those:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty in the IIA, and where monitoring would enable preventative or mitigation measures to be taken.

As well as measuring specific indicators linked to the implementation of the plan, contextual monitoring of social, environmental and economic change has been included i.e. a regular review of baseline conditions in the County. This enables the measurement of the overall effects of the LDP.

There are numerous IIA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions

²⁰ Latest version available online at: <https://www.flintshire.gov.uk/en/Resident/Council-and-Democracy/Annual-Performance-Report.aspx>

and different plans. A thorough analysis of the data collated, and the emerging trends will, therefore, be important.

A fundamental aspect of developing the monitoring strategy is to link with existing monitoring programmes and to prevent duplication of other monitoring work that is already being undertaken. Flintshire will need to consider how their Annual Performance Report can be used for this purpose.

7.3 Proposed Monitoring Framework

The proposed Monitoring Framework is set out in Table 7-1.

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Table 7-1: Proposed Monitoring Framework (MF) for the Flintshire LDP

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency
1. To reduce crime, disorder and fear of crime	<ul style="list-style-type: none"> - Positive effects on crime reduction. - Uncertain effects on fear of crime. 	<ol style="list-style-type: none"> 1. Number and distribution of wards with LSOAs in the bottom 10% most deprived for crime deprivation, targeting a reduction in those living in the bottom 10%; 2. Crime rates per 1,000 of the population for key offences, targeting a reduction; and 3. % rating of residents who perceived their quality of life has worsened due to crime, targeting a reduction. 	Development management, FCC	Every three years
2. To improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> - Good access to education for new residents. - Some schools could be rendered over-capacity as a result of the LDP. 	<ol style="list-style-type: none"> 1. Percentage of population with no qualifications; 2. Percentage of population with NVQ2 and above qualifications. 	Office for National Statistics data on labour market	Annual
3. To improve physical and mental health and wellbeing for all and reduce health inequalities	<ul style="list-style-type: none"> - Good access to health services - Some health services potentially rendered over-capacity 	<ol style="list-style-type: none"> 1. Number of wards in the bottom 10% for health deprivation, seeking a reduction; 2. Percentage of people classified as being in good or very good health, targeting an increase; 3. Percentage of people participating in regular sport or exercise, targeting an increase; and 4. Number of GP surgeries in the County with surplus capacity, seeking to ensure there is enough capacity to satisfy local needs. 	Index of Multiple Deprivation Well-Being Assessment Area Profiles Development management, FCC	Every three years
4. To provide access to good quality, affordable housing that meets the needs and requirements of the community	<ul style="list-style-type: none"> - LDP will satisfy the housing needs of the entire community 	<ol style="list-style-type: none"> 1. Percentage of households prevented from becoming homeless 2. Housing supply in relation to housing need 	Development management, FCC	Annual
5. To improve sustainable access to basic goods, services and amenities for all groups	<ul style="list-style-type: none"> - Some new residents will be likely to have relatively high reliance on personal car use 	<ol style="list-style-type: none"> 1. Journey to work by mode i.e. % of those opting to walk, cycle, bus or train to work, targeting a consistent increase in sustainable transport modes; 2. Average distances travelled to work; and 3. Distance travelled to work, seeking to ensure residents are typically within a few kilometres of their place of work. 	Office for National Statistics data on labour market	Every three years
6. To build strong and cohesive communities	<ul style="list-style-type: none"> - The LDP will ensure new residents are situated within existing communities 	<ol style="list-style-type: none"> 1. Percentage of people who feel that their local area is a place where people from different backgrounds can get on well together; 2. Support provide for those who feel lonely and isolated; 3. % residents living in dangerously low air quality. 	Development management, FCC	Every three years

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IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency
	- The LDP will situate new residents in proximity to air, noise and light pollutants		North Wales Combined Authority Annual Air Quality Progress Report	
7. To promote a sustainable economy, business development and investment	- The LDP will enable sustainable economic growth	1. Gross Value Added per head, seeking an increase; 2. Value Added Tax, seeking an increase; and 3. Economic activity rate, seeking an increase.	Development management, FCC	Every three years
8. To provide employment opportunities across the County and promote economic inclusion	- The LDP would help to facilitate growth in local employment opportunities	1. Number of LSOAs in bottom 10% employment deprived; 2. Percentage of 16-64-year olds unemployed; 3. Proportion of businesses in Flintshire hiring locally; 4. Employment in different sectors, seeking to ensure a varied mix; 5. Number of LSOAs in bottom 10% for income deprivation.	Index of Multiple Deprivation Office for National Statistics data on labour market	Every three years
10. To protect and enhance biodiversity and geodiversity	- The LDP could have adverse effects on biodiversity in some locations.	1. Number of development schemes which adopt biodiversity enhancement measures; 2. Total tree canopy in the County, targeting a net increase; 3. Condition of SSSIs in the County.	Development management, FCC NRW SSSI survey results	Every three years
11. To conserve and enhance the County's landscape and townscape character and quality	- The LDP could have adverse effects on landscape in some locations.	1. Amount of development in the countryside; and 2. Development within, adjacent to or viewable from the AONB.	Development management, FCC	Every three years
12. To protect and enhance the cultural heritage assets	- The LDP could have adverse effects on the historic environment in some locations.	1. Proportion of new development that adopts avoidance or mitigation measures in relation to heritage assets 2. Number of Listed Buildings, on the at-risk register, seeking a reduction.	Development management, FCC	Every three years
13. To protect and enhance the quality of water features and resources	- The LDP could pose a risk to the quality of water in natural waterbodies in some locations. - The LDP would result in a net increase in water consumption.	1. Amount of new development each year that requires a consent to be built in proximity to the Dee 2. Water resource availability as per Water Resource Management Plans (every 5 years).	Development management, FCC	Annual
14. To reduce the risk of flooding	- The LDP would expose a limited number of residents	1. Percentage of development with SuDS 2. Number of applications permitted contrary to NRW advice on flooding.	Development management, FCC	Annual

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IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency
	and businesses to surface water and fluvial flood risk.			
15. To protect and improve air quality and limit greenhouse gas emissions	- The LDP would be expected to result in a net increase in GHG emissions and air pollution	1. Total and proportion of CO ₂ emissions from the transport sector	UK local authority and regional carbon dioxide emissions national statistics: 2005 - 2016	Annual
16. To increase energy efficiency, require the use of renewable energy and sustainable building design	- The LDP would be expected to result in a net increase in energy consumption	1. Average annual fuel bill for residents; 2. Number of renewable energy projects permitted in the County; and	Development management, FCC	Annual
17. To ensure sustainable use of natural resources	- The LDP would be expected to result in a net loss of agriculturally and ecologically valuable soils	1. % of development that takes place on best and most versatile (ALC) land; 2. Percentage of land remediated, as a proportion of total contaminated land in the County; and 3. % of new developments that incorporate waste management facilities.	Development management, FCC	Annual
18. To encourage the protection and promotion of the Welsh Language	- The LDP could risk diluting rates of Welsh speaking in sensitive areas	1. % increase in the number of Welsh speakers in the County; 2. CIL or S106 Agreement contributions from large developments in areas where there is a high percentage of Welsh speakers in the Ward – for lessons or community activities in Welsh or Education.	Development management, FCC	Every three years

8. Next Steps

This IIA Report has now been issued for consultation alongside the Deposit LDP (September 2019) to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, Flintshire CC will review the feedback and incorporate the findings into the Deposit LDP as appropriate.

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

developmentplans@flintshire.gov.uk

or

Andrew Farrow
Chief Officer (Planning and Environment)
Flintshire County Council
County Hall
Mold
Flintshire
CH7 6N