

Flintshire Local Development Plan 2015 - 2030

Preferred Strategy Consultation
Document Flintshire Integrated
Impact Assessment
(Welsh Language,
Health and Equalities)

November 2017

Health, Equalities and Welsh Language Impact Assessment of the LDP Preferred Strategy

Background

As part of the LDP process there is a requirement to carry out ongoing impact assessments as the plan is developed to ensure all aspects of the community are considered. This Background Paper provides the policy context for impact assessments, a brief overview of the first stage of the Flintshire Integrated Impact Assessment tool, how this fits with the development of the LDP and how it links in with the Sustainability Appraisal. The Flintshire Integrated Impact Assessment (FIIA) includes Equalities, Welsh Language and Health assessments for LDP.

This Background Paper covers the following issues:-

- i) Introduction to the LDP Preferred Strategy
- ii) Policy Context, relevant guidance in PPW/TAN/LDP Manual.
- iii) An Integrated Impact Assessment approach to be used by Flintshire.
- iv) Initial findings
- v) Links to the Integrated Impact Assessments (IIA) which incorporates the Sustainability Appraisal of the LDP. The IIA/Strategic Environmental Assessment/ Sustainability Appraisal (IIA/SEA/SA) is a separate piece of work being carried out by consultants, Arcadis, alongside the LDP to ensure there is an independent assessment of the LDP.

1. Introduction

1.2 The Flintshire Local Development Plan (LDP) provides the sustainable framework for land use planning in the County up to the year 2030, and a platform for development thereafter. It will shape Flintshire's future physically and environmentally, and influence it economically and socially. It will respond to the needs of a growing population and regionally important economy, in making provision for new jobs, homes, infrastructure and community facilities, but it must do this in a way that ensures the well-being of its communities is maintained, and the impacts of the development and use of land are managed and mitigated sustainably.

1.3 Flintshire County Council (FCC) is in the process of developing the new LDP, to replace the existing adopted Unitary Development Plan (UDP). The Planning and Compulsory Purchase Act 2004 (the Act) requires each local planning authority in Wales to prepare a LDP. The LDP will run from 2015 to 2030.

1.4 The Preferred Strategy is the first principal part of the Flintshire LDP and is important in setting out how Flintshire is expected to evolve over the period to 2030. It represents the completion of a period of pre-deposit plan preparation and engagement, the outcome of which has had a clear influence over the selection of the Preferred Strategy. The key components of the LDP Preferred Strategy therefore comprise:

- Provision for 7,645 new homes to deliver a requirement of 6,950;
- Provision of opportunities to deliver 8 -10,000 jobs in the County;
- Provision of 223 ha of employment land; and

- Application of Spatial Option 5 – Sustainable Distribution plus Refined Approach to Rural Settlements with concentration of development in the following sustainable locations:
- Key Strategic Sites of Northern Gateway, Deeside and Warren Hall, Broughton;
- Main Service Centres Local Service Centres; and Sustainable Villages - in accordance with the settlement hierarchy;
- Delivering development in a sensitive needs driven sustainable manner in the Defined and Undefined Villages;

1.5 Strategic Policies The Preferred Strategy also sets out the Strategic Policies which will form the framework for implementing and delivering the Council's Deposit LDP. The Strategic Policies are grouped according to the three elements of Sustainable Development - Community, Economy (which is further subdivided into employment growth and housing growth) and the Environment. The four sections of the Preferred Strategy that define the Council's Strategic Policies are therefore:

- Creating Sustainable Places and Communities
- Supporting a Prosperous Economy
- Meeting Housing Needs
- Valuing the Environment

1.6 As part of a continuous process of appraising and testing the LDP the Council are undertaking an assessment of the sustainability of the Plan through an Integrated Impact Assessment which incorporates a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). The IIA/ SA/SEA is an assessment being carried out by specialist independent consultants to appraise the emerging Plan against a set of sustainability criteria (social, environmental and economic aspects are all taken into consideration) in order to ensure sustainable development.

1.7 As part of researching and progressing the Equalities, Welsh Language and Health assessments the Council has developed a Flintshire Integrated Impact Assessment tool (IIA), which has been used to carry out the assessment of the Preferred Strategy. This has been undertaken in conjunction with Officers in the Strategic Policy Advise Team. This is explained in more detail below.

2. Planning Policy Context

It is a legal requirement to carry out the SA at each stage of preparing the plan. It is also a statutory requirement to carry out an Equalities Impact Assessment. The following sections explain the planning policy context for the three types of impact assessments.

Equalities Impact Assessment

2.1 Planning Policy Wales states in para 2.1.9 '*Plan preparation should be inclusive and recognize the requirements of all sectors of society including compliance with the Equality Act 2010.*'

2.2 LDP Manual (Edition 2 August 2015).

The Manual suggests that EIA and WLIA can be carried out through the Sustainability Appraisal, with Para 3.2.3 stating. '*This integrated SA process can also encompass other types of plan appraisal for example equality⁶, disability and Welsh language implications should be considered as part of the social impacts of the plan. However*

Habitats Regulations Assessment (HRA) is different from SA in terms of procedure and should be undertaken separately.'

The Welsh Language Impact Assessments (WLIA)

2.3 Planning Policy Wales (9th edition) states that the Welsh Language is part of the social and cultural fabric of Wales (para 4.13.1) and that the land use planning system should also take account of the Welsh Language and in doing so can contribute to its well-being (4.13.2)

2.4 It goes on to say that, " *All local planning authorities should include in the reasoned justifications to their development plans a statement on how they have taken the needs and interests of the Welsh language into account in plan preparation, and how any policies relating to the Welsh language interact with other plan policies*" (4.13.3). It also states " *If required, language impact assessments may be carried out in respect of large developments not allocated in, or anticipated by, a development plan proposed in areas of particular sensitivity or importance for the language*" (4.13.5).

2.5 Although not directly stipulating that a Language Impact Assessment needs to be carried out as part of the Development Plan, PPW does state that the needs and interests of language do have to be taken into account. The later statement then suggests that some kind of assessment should be carried out when allocations are made in sensitive areas.

2.6 Technical Advice Note 20 "Planning and the Welsh Language" (October 2013) places greater emphasis on assessing impacts of development on the Welsh Language when preparing Local Development Plans (LDP) and that an assessment of impact should be included as part of the Sustainability Appraisal of a plan.

2.7 There is considerable emphasis in TAN 20 on the preparation of the Single Integrated Plan (SIP) (Now the called the Assessment of Local Well-being of Flintshire 2017) and to ensure its conclusions are reflected in the land use policies of the LDP. This Local Well-Being Plan for Flintshire suggests that more is needed in the County to help and encourage the use of the language in the community. TAN 20 also identifies this and suggests promotion of the language by including the use of mitigation measures to reduce adverse effects on the language. In terms of what Planning can do, it is advised, this can be facilitated through using a Section 106 Agreements or the Community Infrastructure Levy schedule.

2.8 TAN 20 also states in para " 3.2 Sustainability Appraisals 3.2.1 *Where a single integrated plan has identified the protection and/or enhancement of the Welsh language as a priority for an area, the LDP should consider this priority in so far as it is relevant to the use of land. The mechanism for doing so is the Sustainability Appraisal (SA) and associated site assessment processes that take place during plan preparation. Where relevant to the use of land, the SA should assess evidence of the impacts of the spatial strategy, policies and allocations on the Welsh language. Where evidence indicates a detrimental impact, given the single integrated plan priority, mitigation measures should be identified in the LDP or the strategy should be amended.*

3.2.2 Where a local authority does not consider the Welsh language to be of significance in any or some parts of the local planning authority area, the LDP should include reference either to the evidence that supports the absence of policies on land use and the Welsh language or to the lack of evidence that supports policies on land use and the Welsh language.”

2.9 LDP Manual (Edition 3 August 2015) states in para 2.8.1 ‘The Welsh Language (Wales) Measure 2011 introduced *duty on organizations including LPAs to comply with the standards to do with the Welsh language*’.

2.10 Para 3.2.3 states.’ *This integrated SA process can also encompass other types of plan appraisal for example equality⁶, disability and Welsh language implications should be considered as part of the social impacts of the plan*’.

Page 48 –‘*Information of particular relevance to be considered as part of the evidence base for the LDP*’ - *includes Welsh Language Community Demographics.*’

2.11 The Wales Spatial Plan 2010, identifies the important role the Welsh language plays in our communities and notes that it is important to promote the language. It states that developing the Spatial Plan Area in accordance with the vision of Iaith Pawb of creating a modern bilingual community is a key priority. The vision for north-west Wales tries to sustain a sense of place and sustain and promote the culture, heritage and the Welsh language.

Health Impact Assessments (HLA)

2.12 Although there is no direct reference to require a HIA, health and well-being is an important aspect of any LDP and it is considered good practice to carry out a HIA on the LDP alongside the EIA and the Sustainability Appraisal /Strategic Environmental Assessment. It is believed that new regulations are due to be coming in in the near future, which will require a HIA to be carried out.

2.13 LDP Manual (Edition 3 August 2015)

Page 48 –‘*Information of particular relevance to be considered as part of the evidence base for the LDP*’ - *includes capacity of physical and social infrastructure.*

2.14 *Land needs and availability; candidate sites*

Discussions should take place with public service providers, including the authority’s own municipal waste department, and health and utilities, to identify whether sites for any additional facilities need to be included in the LDP. For example there may also be an identified need for additional open space in urban areas or sites to accommodate Gypsy and Traveller requirements. Needs may already have been established through the SIP / NPMP.

3. Flintshire Integrated Impact Assessment,

3.1 The Flintshire Integrated Impact Assessment is a new tool that has been developed by Flintshire County Council to assess the impact of proposed strategies and policies on equality and diversity issues, the Welsh language and health and wellbeing (including child poverty). This tool assesses whether a plan or policy meets the needs and requirements of all individuals affected and if it doesn’t, that the negative impacts are recognised and minimised. The key themes covered by the FIIA are drawn from the

Flintshire Improvement Plan and the Well-being Plan with the aim to achieve a consistent and coordinated approach across the Authority.

3.2 Previously three different assessments would have been carried out and it is recognised that a coordinated approach provides a more effective method of assessment. Combining the various assessments will not only take less time, but will also ensure that negative and positive impacts are not viewed in isolation because often they are interrelated.

3.3 The assessment is set out in the form of a series of questions relating to each of the themes set out below. The questions are to consider whether the policy or practice concerned will have a positive, negative or neutral impact.

3.4 Where a negative impact is identified the IIA considers what steps can be taken to mitigate the effects. The answers from the assessment questions indicate what level of impact the plan or policy may have on the topic area in terms of positive impact, neutral impact and negative impact. The overall assessment of the answers can assist in developing actions to mitigate or minimise any negative impacts.

3.5 The main part of the Assessment is a table highlighting the 6 main equality, health, welsh language and the environmental implications. The following are the main headings:

- UN Conventions on Rights of the child,
- Environmental and Biodiversity,
- Equality and Human Rights,
- Poverty
- Health
- Welsh Language.

3.6. In developing the methodology a small working group has been set up with both internal and external representatives from:

- Planning Policy,
- Planning Development Management,
- Economic Development,
- Ecology,
- Energy Services,
- Housing Asset Management,
- Environmental Health
- Public Health Wales,
- Minerals and Waste.

3.7 An initial meeting was held with the working group to discuss each question and whether a positive, negative or neutral impact was likely for each of the Preferred Strategy policies. Examples of the likely impacts and what evidence was available to the authority on the various different issues were also discussed. Finally how the plan could

mitigate the negative effects was also considered. It was recognised by the group that the Preferred Strategy is a framework for the LDP and as such many of its strategic policies are high level and are not specific. As progress is made towards the deposit version of the LDP, the policies will become more detailed and specific. By highlighting the issues now at this early stage, all the issues can be taken into account when the full policies are drawn up. Although it may seem that the preferred strategy policies do not contain enough details to fully understand the impacts, it is valuable to carry out the IIA at this early stage to raise awareness of the issues when it comes to developing the full policies.

3.8 Each question includes a tick box to identify which level the plan impacted the specific topic, a summary of the likely impacts and how the plan could ensure a positive impact and mitigate against negative impacts. Appendix shows the table of questions and responses.

4. Links to the Sustainability Appraisal

4.1 The Integrated Impact Assessment included in the Sustainability Appraisal (SA) follows a number of prescribed steps and mandatory reporting outputs. It is a legal requirement and must meet the requirements of the Strategic Environmental Assessments Regulations. The IIA/ SEA/SA is being carried out at each stage of the LDP to ensure the plan promotes sustainable development. Some of the issues are the same as the FIIA but the appraisal is set out in the form of objectives, indicators and targets rather than impact on different groups or environment. There is some overlap but the FIIA focusing more on the Welsh Language, Equality and health issues.

5. Initial Findings.

5.1 The process has been useful in identifying the fact that the plan does address the 6 main issues in the FIIA. The main principle of the plan is to enable sustainable land use development, the planning system can only facilitate and influence developers and service providers. The planning process can only enable new development. In the same way, the LDP can only inform the services providers of likely future demands and does not actually provide the services needed. In terms of the LDP consultation process, one issue which has been highlighted is that there is a need for more focused consultation with certain groups, particularly the young.

5.2 The FIIA has also drawn out the inequalities facing certain groups in the community and in certain areas of the county. Statistical evidence tells us that certain areas of deprivation occur within the county where people are more likely to suffer poverty or unemployment or have difficulty accessing services. This greater understanding of the issues will be useful when drawing up the more detailed policies in the Deposit LDP. The LDP will positively deliver on many key issues such as, guiding sustainable development, access to new homes and affordable homes and to increasing employment opportunities. The LDP will play a part in increasing opportunities for people in the areas of deprivation in both urban and rural areas. Overall, it was concluded that the Preferred Strategy sets out the framework for policies which have

the potential to be highly beneficial to the population of Flintshire and support some of the most vulnerable in society.

5.3 The next stage of the FIIA will involve consultation on the assessment carried out so far by consulting widely and specifically Key Stakeholder Forum (KSF) members. The KSF includes, amongst others, all the main statutory bodies such as the Betsi Cadwaladr Health Trust, Police, Fire Service, the Welsh Government and the Natural Resources Wales who have been involved in consultation on the plan throughout the process so far. This is to ensure that all statutory bodies and interested parties are aware of the FIIA. The information and evidence gathered as part of the FIIA will be now used to inform the next stage of the LDP, the Draft Deposit Version of the Plan the FIIA table can be used to help develop more detailed policies for the final LDP.

Appendix 1

Planning Policy Wales Edition 9 November 2016

Para.2.1.10 Welsh Language (Wales) Measure 2011 requires local Planning Authorities to comply with the standards to do with the Welsh Language. This primarily relates to producing information in Welsh as part of the LDP process and consultation.

Para 2.4.4. The sustainability appraisal is required to include an assessment of the likely effects of the plan on the use of the Welsh Language in the area of the authority.

Para "4.13. Supporting the Welsh Language

4.13.1 The Welsh Language is part of the social and cultural fabric of Wales. The Welsh Government is committed to ensuring that the Welsh Language is supported and encouraged to flourish as a language of many communities all over Wales. *'A living Language: a Language for living'* sets out how the Welsh Government intends to achieve its goal of strengthening the use of the Welsh Language in everyday life.

4.13.2 The goals set out in the Wellbeing of Future Generations Wales Act 2015 include the aim of achieving "a Wales of vibrant culture and a thriving Welsh language". The future well-being of the language across the whole of Wales will depend on a wide range of factors, particularly education, demographic change, community activities and sound economic base to maintain thriving sustainable communities. The land use planning system should also take account of the Welsh Language and in doing so can contribute to its well-being. The Planning Wales as Act 2015 contains provision relating to the consideration of the Welsh Language in the appraisal of developments plans. And in dealing with applications for planning permission.

4.13.3. Local Planning Authorities must consider the likely effects of their development plans on the use of the Welsh Language in the Sustainable Appraisal of their plans, and should keep their evidence up to date. All local planning authorities should include in the reasoned justifications to their development plans a statement on how they have taken the needs and interests of the Welsh language into account in plan preparation, and how any policies relating to the Welsh language interact with other plan policies.

4.13.4 It should be the aim of local planning authorities to provide for the broad distribution and phasing of housing development taking into account the ability of different areas and communities to accommodate the development without eroding the position of the Welsh language. Where possible, the planning system should seek to create conditions which are conducive to the use of the Welsh language. Appropriate development plan policies about the broad scale, location and phasing of new development could assist in achieving this aim. Policies relating to affordable housing could also be of benefit. However, policies must not introduce any element of discrimination between individuals on the basis of their linguistic ability, and should not seek to control housing occupancy on linguistic grounds.

4.13.5 Considerations relating to the use of the Welsh language may be taken into account by decision makers so far as they are material to applications for planning permission. If required, language impact assessments may be carried out in respect of large developments not allocated in, or anticipated by, a development plan proposed in areas of particular sensitivity or importance for the language. Any such areas should be defined clearly in the development plan. Decisions on applications for planning permission must not introduce any element of discrimination and should not be made on the basis of any person(s)' linguistic ability.

Appendix 2

TAN 20 Planning and the Welsh Language October 2013

3.7 Deposit plan considerations and preparation

3.7.1 The deposit plan is the plan that the local planning authority considers to be sound. The information supporting the plan should be sufficient to explain and justify the contents of the plan.

3.7.2 Where the Welsh language has been identified as a significant part of the social fabric (This seems is slightly different from the wording in PPW Para 4.13 in PPW in the latest edition version 9 Nov 2016) of some or all of the community, the local planning authority should build on earlier LDP preparation and ensure plan strategy, policies and land allocations in the deposit LDP have regard to the needs and interests of the Welsh language. All LDPs should include a short reasoned justification of the regard had by the local planning authority to social, economic and environmental considerations, including the needs and interests of the Welsh language, and how any policies relating to the Welsh language interact with other plan policies. The further evidence on how this has been achieved should be provided by the SA report and a short explanation as to how the assessment has influenced the final document.

3.7.3 The distribution of economic growth can also affect the social character and sustainability of communities. Policies to ensure that there is a sufficient level and range of economic opportunities, including sites and premises, to support and develop local communities could also benefit the Welsh language. Further advice on how the planning system can support sustainable communities by providing an appropriate mix of housing and employment opportunities is provided by PPW and national planning guidance⁴.

3.7.4 LDP policies which take into account the needs and interests of the Welsh language should not seek to introduce any element of discrimination between individuals on the basis of their linguistic ability. Planning policies should not seek to control housing occupancy on linguistic grounds.

Appendix 3

LDP Manual Edition 2. August 2015

Para 2.3.2

Where the use of the Welsh language is part of the social fabric of a community, the needs and interests of the language should be taken into account in the formulation of policies set out in the plan (PPW 4.13/ TAN 20). - - This seems to be out of date now as this is not stated in Para 4.13 in PPW in the latest edition version 9 Nov 2016).

2.8 Use of English and Welsh

2.8.1 The Welsh Language (Wales) Measure 2011 introduced a duty on organisations including LPAs to comply with standards to do with the Welsh language. The Standards provide clarity about the services that should be provided in Welsh and require organisations to use the Welsh language in a reasonable and proportionate manner. Many of the Standards are likely to be relevant to all stages of the process of preparing and revising LDPs but particularly to the way in which LPAs publicise proposals, consult with the public, communicate with those making representation and make arrangements for the conduct of examination proceedings. Use of the Welsh language in communications should be identified in the Community Involvement Scheme (CIS). Pre-hearing meetings provide a forum where practical questions relating to the languages used at the hearing sessions can be discussed so that those who wish to participate through the medium of either the English or Welsh language may do so effectively.

Appendix 4 Health and Well-being Guidance - Taken from Cardiff's LDP SEA/SA

Health and wellbeing PPPs	Implications for the LDP
Wales	
<p>'Climbing Higher': The Welsh Assembly Government Strategy for Sport and Physical Activity (Welsh Assembly Government 2005) Sets targets that, by 2025,</p> <ul style="list-style-type: none"> • The percentage of people in Wales using the Welsh natural environment for outdoor activities will increase from 36% to 60% • 95% of people in Wales will have a footpath or cycle path within a 10 minute walk • No-one should live more than a 6 minute walk (300metres) from their nearest natural green space • All public sector employees and 75% of all other employees will have access to sport and physical activity facilities at, or within 10 minutes walk of the workplace 	<p>The LDP should provide a framework for sport and recreation and set out a strategic approach to such development. It should:</p> <ul style="list-style-type: none"> • Protect areas of open space that have recreation, amenity and/or conservation value • Identify standards of open space and recreational provision • Promote measures to assist walking and cycling <p>The LDP should support the achievement of the 'Climbing Higher' targets. This will have implication on open space and footpath/bridlepath provision.</p>
<p>Technical Advice Note 16: Sport Recreation and Open Space (Welsh Assembly Government 2009) Provides guidance on planning for sport, recreation and informal open spaces, as well as protecting existing facilities and open spaces. Includes guidance on developing Open Space Assessments and standards of provision and the links between health and well being, sport and recreational activity and sustainable development.</p>	<p>The LDP should provide a framework for sport and recreation and set out a strategic approach to such development. It should aim to:</p> <ul style="list-style-type: none"> • Provide the 'benchmark standard' of, per 1000 population: 1.2 ha of land for playing pitches; 1.6 ha of land for all outdoor sport; 0.25ha children's designated equipment playing space; 0.55ha for children's informal playing space; and 0.80 ha for children's playing space • Provide 'local areas' for play or informal recreation within 100 metres of homes; 'locally equipped or landscaped areas' within 400 metres; and 'neighbourhood equipped areas' within 1000 metres • Protect areas of open space that have recreation, amenity and/or conservation value
<p>Technical Advice Note 11: Noise (Welsh Assembly Government 1997) Provides advice on how the planning system can minimise the adverse impact of noise without placing unreasonable restrictions on development or unduly adding to the costs and administrative burdens of business.</p>	<p>Policies and proposals in LDPs should:</p> <ul style="list-style-type: none"> • Locate noise sensitive developments away from existing or planned sources of significant noise • Locate potentially noisy developments where noise will not be such an important consideration • Promote design that minimises or mitigates noise generation

Appendix 5

LDP Spatial Options – Equalities Impact Assessment Quality Assurance Meeting 21/11/16 10 am Video Conference Room

Notes and Feedback

Attendees

Stephanie Aldridge (SA), Fiona Mocko (FM), Vicky Weale (VW)

1. Introduction. VW explained the Strategic options, 6 growth options and the 5 spatial options. That this consultation will help to decide on a Preferred Strategy which will be produced in Spring of 2017 when further consultations will be carried out.

Points coming out of the discussions

2. Issues for disabled people, the layout and design of houses and housing estates is an important issue. Also proximity of new houses to essential services such as health care services and public transport. The issue of adequate blue badge parking spaces also came up, in relation to retail and town centres. The plan should include policies to ensuring there are enough disabled parking spaces in close proximity to the shops and services.
3. Increase in traffic due to new houses and more people moving into area where there is already congestion on the roads.
4. Transgender issues will relate to designing out crime, safety on new development and in new houses.
5. Welsh Language – translations are being monitored so we need to keep a record how much we spend on translations so they can assess the overall cost is over one year. Welsh Language Standards for all new policies FM to send to VW. Welsh Language Impact assessments to be included in policies in the plan. VW to Check that the Strategic Environmental Assessment (SEA)/ Sustainability Appraisal (SA) includes Welsh Language as part of the Cultural and Heritage section.
6. Increase in the number of Eastern European workers to parts of the County implications for the level of growth.
7. 21st Century Schools project possible school closures at Lixwm, Rhos Helyg and Brynford implications for the plan, Policy officers need to meet up with Education.
8. Consultation with Young People how can we reach young people - Schools Councils Emma Murphy, Mick Holt Youth Service, and Alison Thomas may be able to help.

Integrated impact assessment												
LDP Preferred Strategy												
UN Conventions Rights of the child												
What potential and actual impacts will this proposal have on children's rights to	Impact	Describe the impacts and the evidence			Mitigating actions							
	<table border="1"> <tr> <td>Positive</td> <td>Negative</td> <td>Neutral</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </table>	Positive	Negative	Neutral				<p>Evidence - Flintshire Improvement Plan 2016 - 2017, Assessment of Well being for Flintshire 2017. Gypsy and Traveller Accommodation Needs Assessment 2013. Is Wales Fairer Report (2015) Published by the Equality and Human Rights Commission</p>				
Positive	Negative	Neutral										

<p>Non discrimination</p>	<p>x</p>	<p>The plan will ensure that all children have access to education, housing and to community services. Gypsy and traveller children included. Poverty and social exclusion affects children and young people to a greater extent than other groups. Access to well paid jobs is also important as this will impact on the ability of a family to access housing etc, so policies STR 7 and 8 will be important . Fuel poverty also affects this group disproportionately: access to good quality, affordable, energy efficient housing is important in minimising/reducing incidents of fuel poverty, so policy STR 14 will be important. Physical accessibility is also important for this age group as they are more likely to be reliant on public transport, so policy STR 5 will be of relevance. Pockets of deprivation are located along the coastal strip with settlements along the entire strip experiencing deprivation to some extent (WIMD 2014). The strategy identifies a number of settlements already experiencing deprivation as main service centres which will be the main location for new housing development. It is essential that the necessary services accompany the housing development and that housing provision meets a range of needs</p>	<p>Policy STR6 Services Facilities and Infrastructure, STR12 Provision for Gypsies and Travellers, STR7 Economic Development, Enterprise and Employment, STR8 Employment Land Provision. STR14 Climate Change and Environmental Protection. STR5 Transport and Accessibility.</p>
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<p>Right to survival and development</p>	<p>x</p>		<p>The plan will ensure the provision of new and safeguarding of existing play areas and green spaces. Children and young people are less likely to be able to respond effectively to the effects of environmental factors such as flooding, air quality and noise and are more likely to need access to the outdoors as part of their development. Directing new development, including affordable housing and open space to those areas which are less affected by such environmental factors can mitigate the impact on children and young people, so policy STR 14 will be important. Supporting schemes which result in environmental improvements, for example, flood protection, could also help mitigate the impact on existing communities.</p>	<p>STR 13 Natural and Built Environment, Green Networks and Infrastructure. STR14 Climate Change and Environmental Protection.</p>
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Right to be heard	x			General Consultation on the LDP	Consultation on the LDP is not targeting schools but could try to reach the younger members of the community through the Youth Action Group
Environmental and Biodiversity	x				
What potential and actual impacts will this proposal have on	Impact			Describe the impacts and the evidence	Mitigating actions

	Positive	Negative	Neutral		
				<p>Biodiversity Action Plan (FCC 2000), A Green Space Framework Strategy for Flintshire 2013, FCC Open Space Strategy 2007, Flintshire Coastal Park Green Infrastructure Action Plan 2011 . Local Air Quality Management in Wales 2017, ProPG Planning and Noise Policy and Guidance for New Residential Development 2017.</p>	

<p>Reducing greenhouse gas emissions</p>	<p>x</p>	<p>x</p>	<p>New housing and industrial development will increase greenhouse gas emissions, new development must therefore adhere to Building Regs and new buildings to reduce the negative impacts. By creating sustainable development close to existing services and facilities the intention is to reduce the need to travel and reliance on the car so reducing gas emissions. Replacement of existing development and the reuse of brownfield land can have a positive impact on greenhouse gas emissions through improved technology which is less polluting and through remediation of polluted sites. Development which displaces the need for more polluting fossil fuels (e.g. gas rather than coal), which utilises more energy efficient technology (could include carbon capture) or which utilises renewable energy can all help reduce greenhouse emissions. Diverting waste from landfill will also reduce greenhouse gas emissions. Policy STR 14 is relevant, as is STR 15.</p>	<p>STR4 Principles of Sustainable Development and Design, STR 14 Climate Change and Environmental Protection, STR15 Waste Management.</p>
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<p>Plan for future climate change</p>		<p>x</p>	<p>This is about mitigation but also about adaptation. Directing new development away from the flood plain, ensuring that new development can cope with the impacts of climate change through the provision of attenuation or other flood proofing measures. The Local Development plan will consider climate change in its policies and allocations, taking into consideration climate change resilience for the future.</p>	<p>Policy STR4 Principles of Sustainable Development Policy STR14 Climate Change and Environmental Protection, STR11 Provision of Sustainable Housing Sites</p>
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<p>Pollution: air/ water/ soil/noise/vibration and emissions</p>	<p>x</p>	<p>x</p>	<p>New development and increased use of roads may lead to greater air/ noise pollution but also regeneration of polluting older industries may result in cleaner air . Also there are opportunities for developer contributions to regenerate polluted sites which will result in a cleaner environment. Policies in the plan will be directing new housing away from areas where pollution is known to be harmful to health is as important as ensuring that new development doesn't cause harm to residential development.</p>	<p>Policy STR 14 Climate Change and Environmental Protection, STR11 Provision of Sustainable Housing Sites</p>
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<p>Protect coastal and inland waters</p>	<p>x</p>			<p>The coastal waters around Flintshire and the Dee Estuary are highly designated for protection being a Site of Special Scientific Interest, Ramsar and Special Protection Area policies in the plan aim to protect these areas from any new development. There is and has been significant development pressure along the coast and it's likely that some development will need to be located there, however, directing new development away from the floodplain will help minimise the impact on both coastal and inland waters.</p>	<p>STR 13 Natural and Built Environment, Green Networks and Infrastructure, STR14 Climate Change and Environmental Protection.</p>
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<p>Enhancing biodiversity</p>	<p>x</p>			<p>The plan aims to safeguard special areas of biodiversity and to ensure that appropriate mitigation occurs when new developments take place. Flintshire Biodiversity Action Plan 1. Environment (Wales) Act 2015 Under Section 6 Environment (Wales) Act (2016) 2. The Conservation of Habitats and Species Regulations 2010, and the Wildlife and Countryside Act 1981 (as amended) protect those sites designated within Flintshire (by NRW) 3. The Conservation of Habitats and Species Regulations 2010,</p>	<p>Policy STR4 Principles of Sustainable Development, STR13 Natural and Built Environment, Green Networks and Infrastructure also requires</p> <ul style="list-style-type: none"> • a Habitats Regulations Appraisal of land use plans to determine whether the plan alone or in combination with other plans or projects is likely to have a significant effect on any European sites or European offshore marine sites.
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<p>Encouraging resource efficiency (energy, water, materials and minerals)</p>	<p>x</p>			<p>Policies in the plan encourage increased resource efficiency in any new development. The plan will result in new development which will consume further resources. Ensuring that new development is built using sustainable materials, which themselves can be reused or recycled once the development has finished its beneficial life.</p>	<p>Policy STR4 Principles of Sustainable Development. STR16 Strategic Planning For Minerals. STR14 Climate Change and Environmental Protection</p>
<p>Reducing waste production and increase recycling, recovery and re-use of waste</p>	<p>x</p>			<p>The LDP aims to facilitate the sustainable management of waste by securing opportunities to minimise the production of waste and ensuring the sustainable management of waste once it has been produced. Waste can be produced during all stages of a development and the provision of more houses and industry will increase the production of waste. It is likely that the LDP will have both a positive and a negative effect under this category.</p>	<p>STR15 Waste Management, STR 14 Climate Change and Environmental Protection</p>

<p>Reducing need to travel and promote sustainable forms of transport</p>	<p>x</p>			<p>It is a fundamental principle that sustainable development should form the basis of planning policy . New housing and employment allocations will be located close to existing settlements where facilities exist in an attempt to reduce the need to travel. North Wales Regional Transport Plan2009-2015. North Wales Joint Local Transport Plan. There is a potential tension between this category and the need to sustain rural communities and that therefore there is both a positive and negative impact (potentially).</p>	<p>STR4 Principles of Sustainable Development, STR5 Transport and Accessibility, STR14 Climate Change and Environmental Protection, STR11 Provision of Sustainable Housing Sites</p>
<p>Improving the physical environment: housing, public space, access to and quality of green space</p>	<p>x</p>			<p>The policies in the plan provide for new housing on strategic sites at Northern Gateway, Garden City and Warren Hall near Broughton. In general new development will create well designed new housing and public open space . Developer contributions can also help to improve existing green space.</p>	<p>STR 4 Principles of Sustainable Development, STR 13 Natural and Built Environment, Green Networks and Infrastructure, STR11 Provision of Sustainable Housing Sites</p>

<p>Protecting and enhancing the historic environment and architectural, archaeological and cultural heritage</p>	<p>x</p>			<p>One of the main aims of the LDP is to protect and enhance the historic environment. Policies in the preferred strategy form the framework for more detailed policies to safeguard the historic environment in the Deposit LDP.</p>	<p>STR4 Principles of Sustainable Development, STR13 Natural and Built Environment, Green Networks and Infrastructure</p>
<p>Equality and Human Rights</p>					
<p>What potential and actual impacts will this proposal have on the duty to advance equality, eliminate discriminate and foster good relations on people with protected characteristics:</p>	<p>Impact</p>			<p>Describe the impacts and the evidence</p>	<p>Mitigating actions</p>

	Positive	Negative	Neutral	Evidence - Assessment of Local Well-being for Flintshire 2017 Flintshire Improvement Plan 2016 - 2017. TAN12 Design and Guidance on Sites and Context Analysis. Wales Fairer? Report (2015) The State of Equality and Human Rights and Equality issues in wales - a research review (2009) Equality and Human Rights Commission	

Age	x	<p>All ages are potentially affected by the LDP, in terms of school places, or specialist housing requirements or job opportunities. However children, young people and old people experience poverty and social exclusion to a greater extent than other groups. They are also more likely to be reliant on public transport and suffer fuel poverty. Ensuring that provision is made for affordable housing which is energy efficient and which is appropriate for their needs (i.e. lifetime housing) and which is located close to amenities (including open space) and/or public transport can help mitigate the impact on these groups and even have a positive effect.</p>	STR6 Services Facilities and Infrastructure, STR 2 Location of Development
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Disability		x	<p>Policies on development and access issues will help to resolve negative impacts. However disabled people are far more likely to be out of work compared to other groups and are more likely to be reliant on public transport (Equality Issues in Wales (2009) Equality and Human Rights Commission). Ensuring that employment is well located and accessible can have a positive impact on this group. Again, there is a tension between mitigating any negative impacts of the LDP on disabled people and sustaining rural communities.</p>	Supplementary Planning Guidance Note No 13 Access for All, STR5 Transport and Accessibility.
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Gender Reassignment			x	<p>As progress has been made on the LDP, meetings have been held with the EIA Quality Assurance Group . This group has suggested that as a land use plan there will be neutral effects on gender reassignment issues. More generally comments were made suggesting that affordable housing , a mix of housing types would be needed and that crime was highlighted as an issue. The plan will address crime by including policies on community safety in new housing development in the Deposit version of the LDP.</p>	<p>TAN Note 12 Design and Guidance on Sites and Context Analysis including community safety. STR11 Provision of Sustainable Housing Sites</p>
Marriage and civil partnership			x		
Pregnancy and maternity			x		

Race			x	<p>Designing new developments with Community Safety in mind. Ethnic minorities live disproportionately in poor quality housing. Employment rates for ethnic minorities are lower than for white people: Ethnic minorities also tend to earn less per hour than white people, as a result high levels of poverty exist for ethnic minorities. Ethnic minorities are also more likely to be reliant on public transport. Access to affordable, good quality housing which is well located to employment is therefore important. Again, there is a tension between this and the need to sustain rural communities.</p>	<p>STR4 Principles of Sustainable Development and Design, STR6 Services, Facilities and Infrastructure, STR12 Provision for Gypsies and Travellers</p>
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Religion and Belief

x

As above and also to ensure access to Places of Worship, careful consideration of planning applications for places of worship. There is very little evidence as to the impact of religion on various factors such as housing, transport etc. There is evidence that Muslims are more likely to suffer discrimination at work, however, the LDP is only able to ensure that such groups have access to employment; discrimination is addressed through employment laws. There is also evidence that certain religious groups are more likely to suffer hate crime.

As above

Sex			x	<p>Designing new developments with Community Safety in mind. Women are less likely to have access to private transport and women with children find public transport difficult to use. Women are less likely to be economically active and those who are in work are likely to be paid less. The LDP can help to address through the provision of affordable housing in accessible locations close to public transport and services/community facilities.</p>	As above
Sexual orientation			x	<p>As above. There is very little evidence as to the impact of sexual orientation on various factors such as housing, transport etc. though there is evidence on disadvantage and discrimination experienced by LGB people</p>	
Other groups			x		
What potential impact will this proposal have on:					

Promoting cohesive communities			x	<p>Overdevelopment of a settlement could result in negative effect on existing communities . The plan will ensure that development is in scale with the size of the settlement. Developer contributions should also ensure that any negative effects of new developments are mitigated against for example contributing to schools and providing improvement to existing or new play areas. Assessment of Local Well -being for Flintshire April 2017. The need for affordable housing is higher amongst certain groups including women, ethnic minorities, disabled and old people. Ensuring provision is made within a variety of different settlements and that it is integrated with market housing could help promote cohesive communities.</p>	STR5 Transport and Accessibility, STR6 Services, Facilities and Infrastructure, STR11 Provision of Sustainable Housing Sites.
Human Rights	x			As above	As above

<p>Contributing to the equality objectives</p>	<p>x</p>		<p>Reducing health inequalities, see below. Helping to reduce unequal education outcomes - the LDP will include policies to request developer contributions to pay for school places where appropriate. Reducing employment inequalities by ensuring the provision of land for employment and encouraging economic growth. Reduce inequalities in personal safety by ensuring Designing out Crime or community safety designs are used in planning new development. Reduce inequalities in representation and voice by ensuring that consultation on the LDP covers all aspect of the community. Reduce inequalities in access to information, services, buildings and the environment - the aim of sustainable development is to ensure only those settlements which are able to accommodate new development will grow. Reducing health inequalities: Flintshire has some of the most deprived areas with respect to the physical environment according to the WIMD 2014. These areas correspond with other types of deprivation and are found predominantly along the coastal strip. Directing new development to these areas has the potential to exacerbate existing problems if not carefully planned for but conversely, can also provide opportunity. The</p>	<p>STR2 Location of Development, STR6 Services Facilities and STR7 Economic Development Enterprise and Employment, STR8 Employment Land Availability, STR11 Provision of Sustainable Housing Sites. STR12 Provision for Gypsies and Travellers .</p>
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	<p>capacity of some settlements along the coast is inhibited by issues of flood risk and therefore some of these opportunities will not be realised, potentially exacerbating inequalities in the County. Mitigation will be required in locations where limited growth is proposed to ensure that settlements are able to benefit from opportunities: For example, improving access to employment in nearby settlements.</p>				

Health	Impact			Describe the impacts and the evidence	Mitigating actions/promoting equality
	Positive	Negative	Neutral		
<p>What potential and actual impacts will this proposal have on:</p>				<p>Evidence - Assessment of Local Well-being for Flintshire 2017, Strategic Equality Plan 2016 - 2020, Well being of Future Generations Data, Is Wales Fairer. The State of Equality and Human rights 2015. Improvement Plan 2016 - 2017. Local Air Quality Management in Wales 2017, ProPG Planning and Noise Policy and Guidance for New Residential Development 2017.</p>	

<p>Reducing health inequalities</p>		<p>x</p>	<p>Inadequate facilities within the community - New housing development may be located near, for example, a medical centre which is full. The preferred Strategy spatial strategy aims to locate new developments in sustainable settlements where there will be existing facilities. Health inequalities are differences between people or groups due to social, geographical, biological or other factors. The Welsh Index of Multiple Deprivation identifies 8 different domains: Income, employment, health, education, geographical access to services, community safety, physical environment and housing. The 2014 WIMID identified that the most deprived parts of Flintshire are located along the coast and for the majority of different domains this pattern is reflected, with the exception of access, where rural areas in Flintshire are identified as being most deprived wrt access to services, particularly Gronant, Trelawnyd and Gwaenysgor and parts of Caerwys. The LDP has a fundamental role to play in many of these domains: directing new employment to areas already experience deprivation could help reduce deprivation. Directing new housing away from areas of flood risk and industry can help address</p>	<p>Ensure the Health Authority is consulted and is fully aware of future housing proposals to make sure any deficiencies are resolved. Policy STR6 Services Facilities and Infrastructure. STR12 Provision for Gypsies and Travellers, STR5 Transport and Accessibility, STR11 Provision of Sustainable Housing Sites</p>
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deprivation relating to the physical environment. Concentrating new development along the coast could exacerbate problems of access for more rural areas and should be mitigated.

<p>Promoting healthy lifestyles</p>	<p>x</p>			<p>Provision within new development of active travel routes, so adding easy, walking and cycling routes through new housing and employment developments. Making sure new housing is located close to existing services to encourage walking to facilities rather than using the car , ensuring access to open space and the countryside to encourage fitness.</p>	<p>STR13 Natural and Built Environment Green Networks and Infrastructure, STR14 Climate Change and Environmental Protection</p>
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<p>Improving the choice and quality of housing</p>	<p>x</p>		<p>The plan will allocate land for around 7000 new homes for the County over a 15 year period. These homes will be to modern standards and there will be a variety of types of houses to cater for all the different needs of the community. The 2014 WIMD identifies that areas along the coastal strip are most deprived with the housing domain, particularly in the north east of the County. Directing new housing to this area would help improve choice and quality of housing. However, parts of this area are also identified as being deprived in terms of employment and income levels and it is therefore important that the LDP ensures that people can access the housing through the provision of affordable housing.</p>	<p>STR1 Strategic Growth, STR2 Location of Development, STR3 Strategic Sites, STR4 Principles of Sustainable Development and Design, STR11 Provision of Sustainable Housing Sites</p>
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Enabling more people to live well and independently at home			x	As above. Access to services is also critical here, since the majority of housing is existing stock. As identified above, access to services is a particular issue in rural areas and could be exacerbated by directing new facilities towards the coast / urban areas.	As above and TAN Note 12 Design and Guidance on Sites and Context Analysis including community safety and provision of 'lifetime' homes.
Improving outcomes for looked after children			x		
Ensuring adults and children are safeguarded			x		
Poverty					
	Impact			Describe the impacts and the evidence	Mitigating actions

<p>What potential and actual impacts will this proposal have on:</p>	<p>Positive</p>	<p>Negative</p>	<p>Neutral</p>	<p>Evidence - TAN 23 Economic Development, North Wales Local Authorities Economic Ambition, A Strategy for Change 2012 , NE. Wales /West Cheshire Sub Regional Spatial Strategy, Flints, Wrexham and Flintshire Employment Land Review Study, Flintshire Regeneration Strategy 2009-2020, Further Employment Growth Scenarios Assessment.</p>	
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<p>Reducing fuel poverty</p>			<p>x</p>	<p>Provision of new, more energy efficient housing to help reduce energy costs and Affordable housing provision. Fuel poverty is defined as a household which needs to spend more than 10% of income on all fuel to heat its home to an adequate standard of warmth. It is therefore related to income and employment. Fuel poverty maps published by the Welsh Government show that fuel poverty tends to be concentrated along the coastal strip, though there are exceptions to this. Improving access to good quality jobs could also help address fuel poverty by increasing the total income of a household.</p>	<p>STR1 Strategic Growth, STR2 Location of Development, STR3 Strategic Sites, STR11 Provision of Sustainable Housing Sites.</p>
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<p>Improving local employment opportunities</p>	<p>x</p>			<p>Employment land allocations and policies in the plan to encourage economic growth will have a positive impact on job opportunities. Unemployment is concentrated along the coast in areas with significant employment land provision (Deeside) which would indicate that those people living in these areas are not necessarily able to access employment opportunities. This could be due to physical accessibility or skill levels. This could be mitigated through S106 agreements requiring training, apprenticeships etc. The LDP could set the policy requirement for this at the detailed deposit stage.</p>	<p>STR1 Strategic Growth, STR2 Location of Development, STR3 Strategic Sites, STR7 Economic Development, STR8 Enterprise and Employment. STR9 Employment Land Availability, STR9 Town and Other Service Centres.</p>
<p>Maximising traineeships and apprenticeship opportunities</p>	<p>x</p>			<p>Although not a direct influence policies to encourage economic growth will enable training and apprenticeship opportunities.</p>	<p>As above</p>

Protecting people from poverty	x			<p>Employment land allocations and policies in the plan to encourage economic growth will have a positive impact on job opportunities. Accessibility to jobs, either as a result of skills or physical accessibility (see above). Directing new housing to areas already experiencing poverty could potentially exacerbate problems if the underlying causes are not addressed (access to employment/services).</p>	As above
Improving qualification and skills	x			<p>The Plan provides land for new employment development and policies to encourage economic development. As above. It's not enough to simply direct new employment development, local people need to be able to access the jobs which have been created.</p>	As above
Welsh language	Impact			Describe the impacts and the evidence	Mitigating actions/Increasing positive impact

	Positive	Negative	Neutral	Evidence -Assessment of Local Well-being For Flintshire 2017. TAN 20 The Welsh Language 2013, Planning and the Welsh Language 2005, Language Profile of North East Wales 2014	
What potential and actual impacts will this proposal have on:					
Treating the Welsh language no less favourably than the English language		x		Policies in the Plan will ensure the Welsh Language is a material consideration in any land use allocation. If it is considered that there could be a detrimental effect on the language then mitigation measures can be put in place.	STR6 Services, Facilities and Infrastructure, STR10 Tourism, Culture and Leisure
Meeting the Welsh Language Standards	x			During consultation on the LDP all public documents are provided bilingually. Any comments can be made either in English or Welsh.	As above

