

Conwy Local Development Plan Deposit Plan 2007 – 2022



BACKGROUND PAPER 10

Sustainability Appraisal Summary of the Conwy Deposit LDP

April 2009

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1 Non-technical summary - Introduction

- 1.1 This report is the non-technical summary of the combined sustainability appraisal (SA) and strategic environmental assessment, of the Deposit version of the Conwy County Borough Council Local Development Plan (LDP). The main SA report shows the appraisal findings in full.
- 1.2 This non-technical summary intended to provide an overview of the findings of the appraisal, with more detail of the process and outputs included in main report.
- 1.3 The main purpose of carrying out an SA is to assess what the impacts of development proposed in the LDP might be on the economy, the environment and society. Where potential negative effects are identified the SA then makes recommendations for how the LDP can be modified, or controls put on development, to avoid or mitigate against these. This is part of a process where successive stages of the emerging LDP are appraised and findings fed into the next stage of plan preparation.
- 1.4 The full SA report is a public document and its purpose is to show how the sustainability considerations are integrated into preparing the LDP. The SA report is also intended to allow readers of the plan an idea of how effective the LDP might be in delivering more sustainable development, and where there might be adverse impacts.

2 Sustainability appraisal stages

- 2.1 The SA is a process that continues throughout the preparation of the LDP. So far, the appraisal has included several stages and reports. These demonstrate the feedback process between plan making and the sustainability appraisal, allowing sustainability considerations to be integrated into the LDP during preparation.
- 2.2 The SA reports from earlier stages of appraisal are available on the Conwy Borough Council website.

Scoping Report

- 2.3 Part of the statutory requirements for a strategic environmental assessment is to consult with named organisations on what issues the assessment should cover. This is set out in a 'scoping report', an essential first step in appraisal, it includes:
 - a characterisation of the sustainability baseline of the County Borough, to identify key sustainability issues that should be addressed in the LDP
 - a review of other plans and programmes covering the County Borough that may influence SA and LDP

- a set of sustainability objectives to define sustainable development for the SA
 - an outline of the proposed methodology for SA.
- 2.4 Responses from the consultees were taken into account in moving forward with the SA.

SA of the options report and initial preferred strategy

- 2.5 This stage the sustainability appraisal considered the alternative levels of housing and employment for the LDP. The SA also assessed the proposed options for distributing this development around the plan area, to identify the sustainability implications of these alternatives.

SA of the Preferred Strategy

- 2.6 The SA at this stage assessed the sustainability implications of the full preferred strategy version of the LDP. This included an appraisal of the chosen growth option and distribution of development.

3 The sustainability objectives

- 3.1 A set of sustainability objectives have been developed for the SA. These objectives are based on agreed national definitions of sustainable development, but adapted using the information gathered at scoping to tailor them to the needs of the appraisal of the Conwy LDP. They cover a range of sustainable issues related to the protection of the environment and natural resource, the economy and society.
- 3.2 The purpose of the objectives is to provide a consistent definition of sustainable development for the SA process. The emerging objectives, policies and proposals of the LDP can then be tested against them as part of a process of systematic appraisal. Table 1 shows the sustainability objectives.

Table 1: Sustainability objectives for the SA of the Conwy LDP

Concern	Sustainability objective
Social progress which recognises the needs of everyone	
Access to services	<ul style="list-style-type: none"> • Ensure access for all to facilities, goods and services in order to combat social exclusion and deprivation
Community and culture	<ul style="list-style-type: none"> • Maintain and enhance community cohesion and identity
Health and well-being	<ul style="list-style-type: none"> • Provide a clean, healthy and safe environment for all
Housing	<ul style="list-style-type: none"> • Ensure all have access to good quality housing to meet their needs, including affordable housing for local needs
Effective Protection of the Environment	
Biodiversity	<ul style="list-style-type: none"> • To maintain and enhance the diversity and abundance of indigenous species in the plan area
Landscape	<ul style="list-style-type: none"> • Ensure special and distinctive, semi-natural and historic

character	landscapes and their specific features are conserved and enhanced
Built environment	<ul style="list-style-type: none"> • Conserve and enhance the existing built form and design, and ensure new developments are built to high design standards
Cultural heritage	<ul style="list-style-type: none"> • Conserve and enhance the built and archaeological cultural heritage features of the area
Prudent use of natural resources	
Energy	<ul style="list-style-type: none"> • Ensure new development takes into account the need for more efficient energy use, and the LDP promotes energy generation from renewable resources
Land	<ul style="list-style-type: none"> • Make the most efficient use of land through appropriate allocations and determination of need, and through ensuring the appropriate remediation of contaminated land where relevant
Water	<ul style="list-style-type: none"> • Prevent pollution of all water bodies, including surface and groundwaters, and ensure development takes into account the need for efficient water use, development must also be located so as not to increase the risk of flooding or the risk from flooding
Air and Atmosphere	<ul style="list-style-type: none"> • Reduce all forms of air pollution locally and globally to improve the atmosphere
Minerals and primary resources	<ul style="list-style-type: none"> • Safeguard non-renewable resources and promote reuse of primary resources
Maintenance of high and stable levels of economic growth and employment	
Economic diversification	<ul style="list-style-type: none"> • Encourage diversification of the economic base in rural and urban areas
Employment access	<ul style="list-style-type: none"> • Ensure that there is good access for all to employment
Encouraging investment	<ul style="list-style-type: none"> • Emphasise and increase factors conducive to wealth creation and attractiveness to investors

4 Sustainability appraisal of the growth options

- 4.1 An important part of any SA is considering how alternative ways of delivering development area could lead to different impacts for delivering sustainable development.
- 4.2 As shown in paragraphs 2.5 and 2.6, prior to this stage of the SA the appraisal process assessed the relative impacts on sustainability of alternative ways of delivering growth and distributing development. New options were presented for growth at this Deposit stage.
- 4.3 The appraisal identified that the chosen housing growth option was relatively low, based on the need for more houses simply to accommodate the existing population. As more people live alone and live longer so the number of people in each home is gradually decreasing pushing up demand. Therefore, the level of growth is almost as small as is possible to help provide homes to meet the needs of existing residents, natural population change, and meet some of the inevitable demand from people moving into the area whatever reason.

- 4.4 The SA notes that pursuing higher levels of growth may have more impacts on the natural environment, through the need for more land. However, it could also have benefits for the communities of the County Borough by helping to provide more affordable homes, and help more young people remain in the area and perhaps support better economic growth. However, how effectively this is achieved would rely on option chosen for the spatial distribution of growth. To support successful rural communities would mean more housing to rural villages, with the potential for negative impacts related to the LDP objective of reducing the need to travel.
- 4.5 The appraisal of the strategy for distributing development around the County Borough shows that the chosen approach likely to lead to similar patterns of development to what already exists. The focus on the coastal towns is likely to help support these communities, with more development supporting more accessible services, and therefore helping to reduce the need to travel.

5 A sustainable spatial strategy

- 5.1 Creating a sustainable strategy is an essential part of creating a sustainable LDP. 'Frontloading' of the plan to have a sustainable spatial strategy should mean that the rest of the plan could simply follow this in order to deliver sustainability development in the plan area. Using development control policies to fine-tune the deliver and get the most out of development.
- 5.2 One of the principle roles of a spatial strategy is to deliver more sustainable development by reducing reliance on car travel. This can be done through supporting public transport improvements, walking, and cycling routes. However, more important than this a spatial strategy that sets a pattern of development that reduces the need and distance to travel in the first place.
- 5.3 The spatial strategy has an essential role in distributing development and therefore shaping the future shape of the towns and villages. It needs to look for ways to provide a mix of different land uses, such as homes, jobs and services, which people can access without getting in their car. The strategy needs to link where people live to where they work. Everyday commuting creates a large number of unsustainable car trips and often puts those who cannot travel by car at a disadvantage.
- 5.4 Reducing travel can have some major sustainability benefits. These include:
- reducing emission to air, with benefits for local air quality and helping mitigate against climate change
 - lowering Conwy's contribution to climate change
 - reducing congestion can be beneficial for the economy
 - health benefits, from reduced air pollution and reducing adverse impacts on wellbeing of congested roads

- social benefits, as more people have equitable access to jobs and services where the priority is not on people who can or choose to travel by car.
- 5.5 In principle, the strategy of the LDP is compatible with this approach to creating a sustainable spatial strategy. The strategy focuses the majority of development in the 'Urban Development Strategy Area' and should help promote more sustainable patterns of development, reducing the need to travel.
- 5.6 In addition, permitting a proportion of development in the rural area can help support vibrant and viable rural communities, through the provision of new affordable homes for local people and new rural enterprise.
- 5.7 The spatial distribution of development is supported by a policy that requires all sites deliver a high proportion affordable house for local needs. This could have benefits in helping reverse the decline of rural communities and making sure young people can afford to remain in Conwy. However, the SA does note the need to monitor housing delivery to make sure these high targets are not deterring all new housing development, which could potentially have adverse impacts on the economy on Conwy and even risk affordability.
- 5.8 The SA also queries the basis on which housing and employment has been distributed within the Urban Development Strategy Area. The LDP provides little certainty that this is based on meeting the specific needs of different areas. The SA identifies that the distribution of development may be based on site availability, rather than any strategic plan for each town or functional group of towns.
- 5.9 This means the strategy may not be making the best of the opportunities presented by new development. For instance:
- further reducing the need to travel in the coastal area by creating greater self-containment in each town, or functional groups of towns, by balancing levels of jobs and homes, or
 - using growth to stimulate regeneration of towns and support of local services.
- 5.10 The SA does recognise that the spatial strategy in Conwy is restricted in what it can achieve by the quantity of existing housing expected from sites that:
- are committed for housing development and have already been through the planning process
 - houses that have already been built since the start of the plan period
 - houses that are predicated to be developed on sites that are currently unidentified and are not allocated, known as 'windfall'.
- 5.11 This means only 25% of total housing is anticipated from new housing allocations.

- 5.12 The SA also notes that around the same amount of housing is anticipated to be delivered on 'windfall' sites as on allocated housing sites. The SA suggests that, to make sure that these sites come forward in line with the spatial strategy, strategic policies need to be carefully worded to show where development will and will not be permitted, and the scale of development suitable in different towns and villages.

6 Sustainability appraisal of policies

- 6.1 The SA assessed the content of the policies of the LDP. This considered how these policies are likely to contribute to sustainable development as well as recommendations on how they could be improved.
- 6.2 **Principles determining the location of development:** These policies include the main strategy for development, the sustainability of which is part of the spatial strategy SA. Other policies are positive for delivering more sustainable development, and include the principles of good design and sustainable development. The SA recommends some changes to policy and text of avoid duplicating other sections of the LDP.
- 6.3 **Housing strategy:** Strategic issues of housing delivery are addressed in the appraisal of the spatial strategy. The policies on housing should help deliver sustainable development objectives related to social sustainability. For instance, the affordable housing policy could help to support sustainable rural communities.
- 6.4 The SA also makes some recommendations on possible changes to help deliver more sustainable development, including:
- allocated housing sites should be listed in this section
 - housing densities should be maximised to make best use of accessible locations and land
 - a more flexible approach to housing mix should be taken to be able to respond to local demand and make sure land in accessible locations is used efficiently
 - some clarification may be need in the policy on Gypsy, Traveller and Travelling Showpeople sites to make sure these are allocated and determined based on the diverse needs of each community.
- 6.5 The SA also reviewed the housing allocations made in the LDP, using the Council's appraisal of sites as a basis. The Council's appraisal is useful in identifying potential constraints to development on the allocations. These should be followed up in the LDP by including a housing implementation that lists for each site the constraints and sensitivities and how developers will be expected to take these into account in the development proposals.

- 6.6 The SA also queried how decisions were made on the allocated sites being the most suitable, the Council's appraisal contained data gaps for some sites. It is essential that the Council can justify that the choice of allocations are compatible with sustainable development objectives. This includes being able to demonstrate that development of these allocations would not result in harm to the natural and built environment, where comparable alternative sites are available.
- 6.7 **The economic strategy:** Strategic issues of housing delivery are addressed in the appraisal of the spatial strategy. The strategy includes permitting around 20% of new employment development in the rural area, the SA notes that this type of development should only be given permission where it is of a scale suitable to this location, to avoid creating unsustainable travel patterns. However, there may be benefits for rural communities of supporting rural enterprise.
- 6.8 Tourism is an essential part of the Conwy economy, the SA suggests some changes to tourism policies to help make sure they help deliver high quality new development of this type and supporting existing tourism schemes.
- 6.9 **Community facilities and services:** The policies of this section should help support the delivery and protection of accessible facilities and services, essential for viable communities. Policies include supporting retailing and protecting shops from inappropriate change of use, protecting and allocating allotment sites, and delivering new open space in development.
- 6.10 However, the SA makes some recommendations where improvements could be made to policies to help sustainability performance:
- Retail policy could include a strategic sequential approach to delivering this type of development, favouring town centres, to help reduce car travel and out-of-town retailing that can adversely impact on viability of town and village shops.
 - Policies allowing some change of use in shopping centres may help ensure vacant units do not harm the character of these areas. However, it may be suitable to state which types of uses will and will not be permitted to help make sure these areas remain primarily for shopping.
 - To help protect community services there should be an additional policy to protect all existing community facilities, (e.g. community halls and leisure centres) from change of use, unless an alternative site can be found or they can be incorporated into the new development.
- 6.11 **The natural environment:** Protecting, and improving where possible, the natural environment is essential in securing the sustainable delivery of development. However, the SA makes some recommendations where improvements could be made to policy:

- Referring to nationally and internationally protected sites may be suitable in policy. This should not repeat national policies but could reflect on the implications of these designations on the local area, e.g. views to and from Snowdonia national park, and reference to the internationally designated nature conservation sites in Conwy, particularly as allocated development is in close proximity to some of these sites
- in securing renewable energy as part of development, it may be suitable for the LDP set requirements for larger sites to consider viability of combined heat and power.
- a flood risk policy could be included in the LDP to help avoid vulnerable development being put in areas of unsuitable flood risk.

- 6.12 **Cultural heritage:** Conwy contains areas characterised by high quality built historic and cultural heritage. The policies in this section should help in the protection of this, although some changes could be made to improve their clarity.
- 6.13 **Sustainable transport strategy:** The LDP includes policies to help deliver an improved transport network in Conwy. This includes protecting land for public transport, walking and cycling routes, these are essential to help secure a modal shift away from car use, and therefore reduce environmental and health impacts and support equitable access. The policies of the LDP include safeguarding land for new road development. The SA identifies new roads do not perform well in helping achieve more sustainable development. Despite some initial economic benefits from reduced congestion roads will have inevitable longer term negative impacts people and the environment.
- 6.14 **Minerals and waste:** The minerals policies clearly set out that no new hard rock quarries will be permitted in Conwy, although the operation of existing quarries should be protected. This will help reduce the potential impacts of quarrying on people and the environment in the plan area. However, the SA notes that if the long-term demand for hard rock does not decrease, protecting the local environment could simply displace the impacts of quarrying elsewhere nationally or globally. This may also have an increased need for long distance transportation of rock, contrary to principles of sustainability. Policies on safeguarding sand and gravel sites should help reserve this mineral resource for future use.
- 6.15 The LDP lists the type of waste facility that could be developed in the plan area and possible locations. However, to aid delivery of these sites in the short-term, and help deliver more sustainable waste management, it would be better to allocate specific sites and uses through the LDP. Relying on a planning application process to determine sites is likely to be a slower process, particularly if the waste management type is perceived as a risk to health, such as windrow composting or energy recovery.

General comment

- 6.16 To make an LDP that can successfully deliver sustainable development it needs to be easily understood.
- 6.17 Many different types of people will need to make use of the LDP, from householders, planning professionals, interest groups and the planning authorities. This means an LDP that is easier to use should lead to better planning applications and more consistent decision making, resulting in the more successful implementation of sustainable development.
- 6.18 For this reason, the SA makes some general suggestions on changes to the LDP to benefit the clarity and usability of the document.
- 6.19 The LDP is currently quite long and shortening it could make it easier to understand and use. This could include:
- removing some of the repetition in the introduction, strategy and 'reasoned justification' of strategic policies
 - limiting policies to those that directly set development control criteria, in line with current Welsh Assembly Government.
- 6.20 A separation of the 'spatial strategy' text and policies from the development control policies could also help improve the legibility of the LDP. The spatial strategy would set the framework against which all development proposals are tested, with development control policies used to make sure the sustainability benefits of all new development are maximised and adverse impacts avoided.