



# Replacement Local Development Plan 2018-2033

## Background Paper

December 2018

**BP 04: Sustainability Appraisal of LDP Vision,  
Objectives and Options – Non Technical  
Summary**

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## Conwy LDP Review

Sustainability Appraisal of LDP Vision, Objectives and Options

Non-Technical Summary

On behalf of **Conwy County Borough Council**



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# 1 Introduction

## 1.1 Background

- 1.1.1 Peter Brett Associates (PBA), now part of Stantec, has been commissioned by Conwy County Borough Council (CCBC) to undertake a Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), of the Conwy LDP Review and the emerging Replacement Conwy LDP ('the emerging RLDP'). This Non-Technical Summary supports the Sustainability Appraisal Report ('the SA Report') which documents the findings of the SA carried out in respect of the first stage in the LDP Review, namely the Pre-Deposit Key Stakeholders Consultation. At this stage, the proposed LDP Vision and set of Objectives and a suite of growth and spatial options are being consulted on to inform the content of the emerging RLDP.
- 1.1.2 This introductory section identifies the purpose, objectives and structure of this Non-Technical Summary. It then outlines core statutory requirements for undertaking SA and provides a summary of the proposed content and purpose of the emerging RLDP.

## 1.2 Purpose

- 1.2.1 This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Conwy LDP Review and the emerging Replacement Conwy LDP ('the emerging RLDP'). There are two consultation papers which have been subject to SA:
- **Consultation Paper 1: Priority Issues, Vision & Objectives** – this paper seeks views on the proposed structure of the emerging RLDP, which needs to align with statutory and national policy requirements, and a proposed Vision and supporting Objectives to underpin the RLDP. The paper provides the proposed strategic framework within which pertinent planning matters will be addressed through strategic policies, development management policies, land use allocations and environmental designations; and,
  - **Consultation Paper 2: Growth Level and Spatial Distribution Options** – this paper sets out growth options for the level of housing and employment development which should be planned for in the emerging RLDP and spatial options for where future development should be distributed. In doing so, the paper also seeks views on the settlement hierarchy within the CCBC area.
- 1.2.2 The SA Report responds to relevant statutory requirements, considers the evolution of the emerging RLDP to date and presents an assessment of likely significant effects from the above Consultation Papers. For the purpose of fulfilling statutory SEA requirements, the SA Report acts as the statutory Environmental Report that is required to accompany each substantive component of the emerging RLDP which is subject to public consultation. The Consultation Papers published in tandem with the SA Report set out a proposed Vision and Objectives for the RLDP and consider a suite of potential growth and spatial options, all of which constitute substantive proposals that will inform the emerging RLDP and therefore need to be subject to SA, incorporating SEA.
- 1.2.3 The objectives of this report are to fulfil statutory SA and SEA reporting requirements, to identify likely significant effects from the Consultation Papers and to recommend mitigation and enhancement measures which should be incorporated into the emerging RLDP as it develops to ensure the avoidance of likely significant adverse environmental effects and to enhance its effectiveness.

## 1.3 How to Comment on this SA Report

- 1.3.1 This Non-Technical Summary (NTS) and the SA Report are being issued for consultation alongside the Consultation Papers. Subject to approval from CCBC, all three documents will be consulted on for a period of six weeks. Comments in respect of the Consultation Papers and this SA Report can be provided by email to [cdll-ldp@conwy.gov.uk](mailto:cdll-ldp@conwy.gov.uk). Further details of how to participate in the consultation will be provided on CCBC's dedicated LDP Review website: <http://www.conwy.gov.uk/RLDP>.

## 1.4 Structure of this Report

- 1.4.1 Our report is structured as follows:

- **Section 1:** The remainder of this section identifies core statutory requirements for undertaking the SA, incorporating SEA, of the emerging RLDP;
- **Section 2:** explains the background to the development of the emerging RLDP and provides a summary of its proposed content and purpose;
- **Section 3** outlines key sustainability information and issues which have informed the SA process undertaken to date and which should be taken account of in the emerging RLDP itself. The section is supported by detailed baseline analysis and a review of relevant plans and programmes (RPP) provided in **Appendices A** and **B** of the SA Report respectively;
- **Section 4** provides an overview of the SA process undertaken to date, including how matters raised by the SEA Consultation Bodies at SA Scoping stage have been addressed. The SA Framework used to assess the likely significant effects of the proposed Vision, Objectives and Options (Growth and Spatial) is provided in full in **Appendix C of the SA Report**;
- **Section 5** presents the key findings of the SA undertaken in respect of the proposed Vision and Objectives for the emerging RLDP and in relation to a suite of potential growth and spatial options to inform the content of the emerging RLDP. The full results of the SA undertaken in respect of these substantive components of the emerging RLDP are detailed in **Appendices D** and **E of the SA Report**; and,
- **Section 6** sets out mitigation and enhancement recommendations which should be addressed in future iterations of the emerging RLDP and outlines the next steps in the SA process.

## 1.5 Statutory Requirements

### LDP Preparation and Review

- 1.5.1 In late 2017, CCBC consulted on a draft Conwy LDP Review Report, which recommended that a 'Full Review' should be carried out of the existing Conwy LDP (adopted October 2013) in accordance with the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 as amended ('the 2005 LDP Regulations'). Statutory requirements relating to the preparation of LDPs are therefore now applicable to the LDP Review, including in respect of SA and SEA.
- 1.5.2 In accordance with the 2005 LDP Regulations, the proposed approach, timescales and consultation arrangements for the LDP Review are set out within the finalised Conwy LDP Review Delivery Agreement, which was agreed with the Welsh Assembly Government in May 2018.



## Sustainability Appraisal and Strategic Environmental Assessment

- 1.5.3 Under Section 62(6) of the 2004 Act, emerging LDPs need to be subject to Sustainability Appraisal, which is statutorily required to guide the selection and development of policies and proposals for inclusion in LDPs in terms of their potential social, environmental and economic effects. The SA presently required for the LDP Review will need to build upon the SA, incorporating SEA, prepared for the first Conwy LDP (adopted October 2013). As the 'Full Review' procedure is being used, the LDP Review will effectively mirror the original LDP preparation process and will result in the preparation and adoption of a replacement LDP (rather than the existing LDP only being subject to individual changes).
- 1.5.4 The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 ('the SEA Regulations') require Responsible Authorities, including local authorities such as CCBC, to assess the likely significant environmental effects of implementing relevant plans and programmes, as defined within the regulations. The SEA Regulations also require Responsible Authorities to examine the LSEs of reasonable alternatives to the plan or programme under consideration. Where required, the assessment is to be prepared following a staged reporting process known as Strategic Environmental Assessment (SEA).

### Stages of SA and SEA

- 1.5.5 SA and SEA comprise the following stages:
- **Screening:** This requirement was fulfilled through the inclusion of the draft SEA Screening Determination within the Conwy LDP Review SA Scoping Report (see below) and the subsequent publication of a positive SEA Screening Determination by CCBC;
  - **Scoping:** This requirement was fulfilled through the submission by CCBC of a SA Scoping Report to the SEA Consultation Bodies in August 2018 for a five-week consultation period;
  - **Preparation and Consultation: This is the current stage of the SA, incorporating SEA, process.** Welsh planning authorities preparing LDPs are required "to carry out a sustainability appraisal of the proposals" within it and to "prepare a report of the findings of the appraisal". A SA Report needs to accompany each substantive element of the RLDP as it emerges. An SA Report is therefore required to accompany the current Consultation Papers as these set out a proposed LDP Vision and Objectives which are themselves substantive LDP components, as well as to support the proposed Growth Options outlined in the Consultation Papers. Each iterative SA Report must be consulted on in tandem with the related substantive component(s) of the emerging RLDP, with the SA Report for the final LDP Deposit Document then submitted to the Welsh Assembly Government to support an independent examination of the RLDP. The iterative SA Reports accompanying the emerging RLDP also fulfil the statutory requirement under the SEA Regulations to provide an 'Environmental Report' to "identify, describe and evaluate the likely significant effects on the environment of implementing" the plan, as well as the effects of its reasonable alternatives; and,
  - **Preparation of a Post Adoption Statement:** Once a replacement LDP is adopted, CCBC must prepare a statement setting out, amongst other matters, how environmental considerations have been accounted for in the adopted RLDP, and how the likely significant effects of the RLDP on the environment will be monitored.
- 1.5.6 The SEA Regulations introduce a link between SEA and a need, in some cases, for a separate Habitats Regulation Appraisal (HRA) of plans and projects where there is the potential for significant effects on European Sites (Special Protection Areas and Special Areas of Conservation). A separate HRA will be undertaken by or on behalf of CCBC in tandem with the SA of the LDP Review.

## 2 Overview of the Conwy LDP Review

### Context

2.1.1 CCBC is the unitary authority responsible for local government across a 1130km<sup>2</sup> area of North Wales, as shown in **Figure 2.1**.

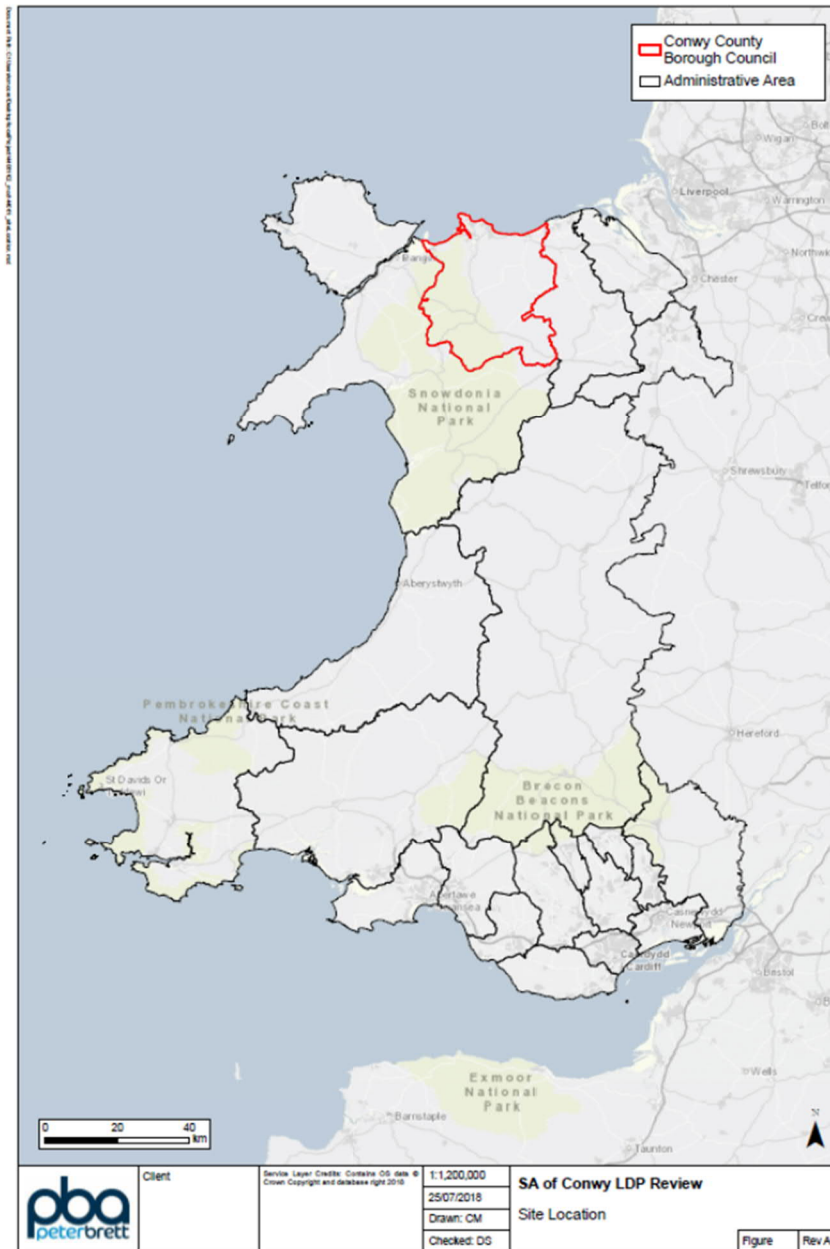
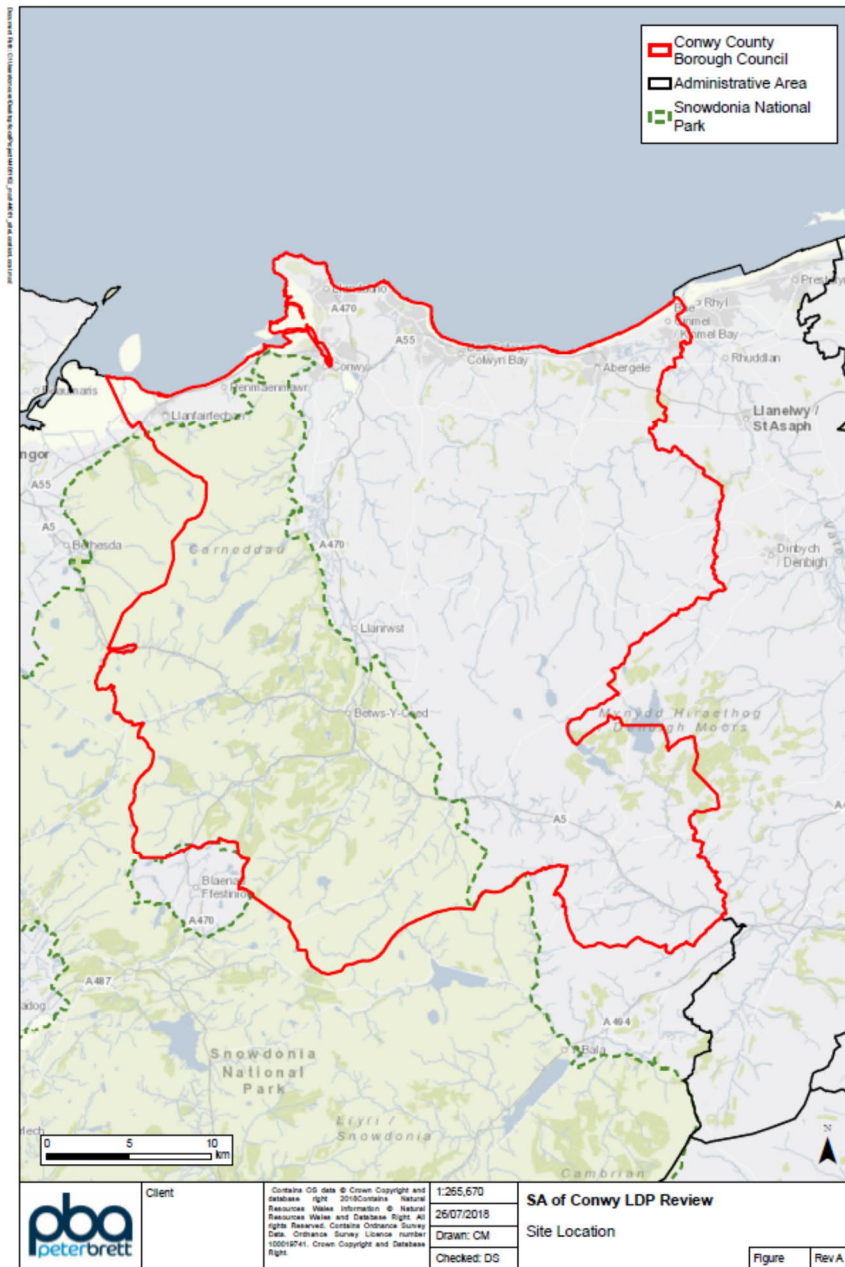


Figure 2.1: The Conwy County Borough Council Area

2.1.2 In accordance with the Planning and Compulsory Purchase Act 2004 ('the 2004 Act'), CCBC adopted its first LDP in October 2013. This LDP covers the part of CCBC's administrative area outside Snowdonia National Park (refer to **Figure 2.2** below), which is subject to separate planning control by Snowdonia National Planning Authority and is covered by the Eryri LDP.

The first Eryri LDP was adopted in July 2011 and at the time of writing (December 2018) an independent examination of proposed Short Form Revisions to the LDP is ongoing.

Figure 2.2: Relationship between CCBC Administrative Area and Snowdonia National Park



2.1.3 CCBC has undertaken regular monitoring since 2013 and has prepared a LDP Review Report (April 2018) which concludes that the LDP should be subject to a ‘Full Review’ in accordance with applicable statutory provisions (see below). This review (hereafter ‘the LDP Review’) is needed to allow CCBC to prepare and adopt a replacement LDP (‘the RLDP’) prior to the expiry of the existing LDP in 2022 and to ensure that the statutory Development Plan for the CCBC area remains up to date. In particular, the RLDP is needed to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adoption of the existing LDP.

2.1.4 In February 2018 CCBC consulted on a draft Delivery Agreement to underpin the LDP Review process and the finalised Conwy Replacement LDP Delivery Agreement was subsequently agreed with the Welsh Assembly Government in May 2018. The Delivery Agreement sets out the process, timescales and consultation arrangements to undertake a 'Full Review' of the existing LDP and in doing so to prepare and adopt the Conwy RLDP by September 2021.

## 2.2 Proposed Form and Content of the Replacement Conwy LDP

2.2.1 The 2004 Act stipulates the process which must be undertaken for the LDP Review, in particular the preparation of LDP Pre-Deposit and Deposit Documents by the LPA, followed by an independent examination. Of note, the Pre-Deposit Key Stakeholders Consultation is not statutorily required under the 2004 Act or the 2005 Regulations; rather, it is being undertaken by CCBC on a voluntary basis to encourage early engagement in the LDP Review and to inform the development of the Preferred Strategy for the emerging RLDP. Building upon this Pre-Deposit Key Stakeholders Consultation, the Preferred Strategy will be subject to separate consultation and SA in June 2019.

2.2.2 The 2004 Act and the 2005 Regulations prescribe the minimum content which must be included within any Welsh LDP, namely:

- The name of the area of the LPA for which the LDP is prepared;
- The date of adoption and expiry of the LDP;
- The LPA's objectives in relation to the development and use of land in their area;
- The LPA's general policies for the implementation of those objectives;
- A proposals map of the LPA's area showing the proposals for the development and use of land; and,
- A reasoned justification of the policies contained within the LDP.

2.2.3 In addition, LDPs typically include an overarching vision, suite of objectives and a spatial strategy, although none are specifically required under the 2004 Act or the 2005 Regulations.

2.2.4 At this stage, it is envisaged that the replacement LDP for the CCBC area will comprise the following substantive components:

- Proposed LDP Vision and Objectives;
- A spatial strategy (and potential sub-area strategies) to implement the LDP vision and objectives;
- Strategic policies to implement the spatial strategy and LDP objectives and to respond to key sustainability issues (**Section 4.2** and **Appendix A of the SA Report**) and legislative requirements (**Section 4.3** and **Appendix B of the SA Report**). In particular, strategic policies will need to implement specific requirements from the 2004 Act, the 2005 LDP Regulations, Planning Policy Wales – 10<sup>th</sup> Edition (December 2018), the Conwy and Denbighshire Local Wellbeing Plan (2018 – 2023) and the Well-being of Future Generations (Wales) Act 2015;
- Development management policies to implement the spatial strategy and strategic policies; and,
- Site allocations.

- 2.2.5 The above list of intended LDP components is not exhaustive and may change through the LDP Review. Each emerging substantive component of a replacement Conwy LDP will need to be subject to SA, incorporating SEA, in line with the approach set out within this Scoping Report.
- 2.2.6 To comply with statutory and case law requirements, the replacement LDP will need to include a reasoned justification for the inclusion of each substantive component and be supported by a suite of evidence base documents. These will inform the SA process as well as being required for plan preparation purposes.

## 2.3 Preparation and Evidence Base

- 2.3.1 Since the adoption of the finalised Conwy LDP Review Delivery Agreement in May 2018, the development of the emerging RLDP has focused on evidence gathering and early engagement activities, including:
- Call for Candidate Sites: July – August 2018;
  - SEA Screening and SA Scoping: August – October 2018;
  - Evidence Gathering including Employment Land Review Update (ongoing since June 2018) and the preparation of topic and background papers (ongoing)<sup>1</sup>.
- 2.3.2 The Issues and Options Pre-Deposit Key Stakeholder Consultation which this SA Report supports marks the first time that substantive proposals have been put forward by CCBC to inform the emerging RLDP. The Pre-Deposit Consultation Papers presently being consulted on comprise:
- Consultation Paper 1: Priority Issues, Vision & Objectives;
  - Consultation Paper 2: Strategic Growth and Spatial Distribution Options; and,
  - Suite of Topic Papers:
    - Housing;
    - Economy, Skills & Employment;
    - Retail;
    - Tourism;
    - Community Facilities;
    - Natural Environment;
    - Historic Environment;
    - Transport;
    - Renewable Energy;
    - Minerals & Waste;

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<sup>1</sup> Background papers will present a detailed analysis of relevant evidence (baseline data, legislative requirements, etc.), with the implications of related papers for the emerging RLDP set out within a suite of thematic Topic Papers. The Topic Papers will in turn inform the Preferred Strategy and detailed content of the emerging RLDP.

- Wellbeing, Health & Equalities; and,
- Recreational Spaces.

2.3.3 These documents are supported by a set of Background Papers which present an analysis of relevant evidence (baseline data, legislative requirements, stakeholder priorities, etc.) on a thematic basis to identify key issues which should be addressed in the emerging RLDP. The Background and Topic Papers have also taken account of the key sustainability issues identified through SA Scoping, as detailed in **Section 3.2** of the SA Report. Three Background Papers in particular have influenced the content of the Consultation Paper 2 regarding growth and spatial options for the emerging RLDP, namely:

- i. BP/1 Growth Level Options Report Paper;
- ii. BP/2 Spatial Distribution Options Paper; and,
- iii. BP/3 Hierarchy of Settlement Paper.

2.3.4 The Consultation and Topic Papers listed above are being subject to non-statutory consultation. However, early discussions on the evidence base and key issues to be addressed in the emerging RLDP are critical for securing buy-in from key stakeholders and delivering an effective LDP. CCBC has therefore determined that focussed consultation should take place on the proposed Vision, Objectives and potential options for the RLDP prior to future statutory consultation on the Preferred Strategy for the RLDP. Owing to the inclusion in the Consultation Papers of substantive proposals for the emerging RLDP (i.e. the proposed Vision, Objectives and potential spatial and growth options), these proposals need to be subject to SA, as detailed within this SA Report, with the SA findings consulted on in tandem with the Consultation Papers.

## 3 Environmental and Policy Context

### 3.1 Introduction

3.1.1 **Section 3.2 of the SA Report** provides a summary of relevant baseline environmental and socio-economic conditions identifying key sustainability issues of relevance to the LDP Review. **Section 3.3 of the SA Report** then summarises the relationship between the Conwy LDP and other relevant plans and programmes. Each section is supported by detailed baseline and policy reviews provided in **Appendices A and B** of the main SA of LDP Vision, Objectives and Options Report ('the main SA Report') respectively.

### 3.2 Key Sustainability Issues

3.2.1 With reference to the environmental topics prescribed within Schedule 2 of the SEA Regulations, a summary of the key sustainability issues identified in **Appendix A** which need to be addressed within the LDP Review and taken account of in the associated SA is provided in **Table 3.1** of the main SA Report. The identification of key sustainability issues has also been informed by consideration of the likely evolution of baseline conditions in the absence of the LDP Review, as detailed in **Appendix A.4** of the main SA Report. In short, this concludes that the absence of the LDP Review is likely to result in a planning policy vacuum within the CCBC area which could lead to development coming forward in unsustainable locations and contrary to CCBC's preferred spatial strategy simply to meet identified needs, principally for new housing.

Table 3.1: Key Sustainability Issues relating to the Conwy LDP Review

| SEA Topic   | Key Sustainability Issues  |
|---|--|
| Biodiversity, Flora & Fauna                           | <p>The need to conserve, protect and enhance biodiversity including important species and sites designated for reasons of biodiversity conservation or ecological importance. This relates to the protection of designated sites located within the CCBC area (including within and outwith the area covered by Snowdonia National Park) as well as designated sites in neighbouring authorities, all of which have the potential to be affected by the LDP Review and development activity within the CCBC area.</p> <p>The need to safeguard and enhance the green infrastructure network in the CCBC area and green infrastructure connections to neighbouring authorities. Green networks are of particular importance for providing ecosystem services and habitat connectivity in a changing climate.</p>  |
| Population (including relevant socio-economic issues) | <p>The need to maximise socio-economic benefits from the implementation of the emerging Growth Deal for North Wales.</p> <p>The need to align with the preparation of a potential Strategic Development Plan (SDP) for the A55 corridor.</p> <p>The need to deliver a sufficient quantum of good quality and well located new housing to meet a range of identified needs.</p> <p>The need to deliver economic growth and increase employment opportunities, including for local residents.</p> <p>The need to tackle deprivation, including areas with existing deprivation linked to poor accessibility to key services, facilities and economic opportunities.</p> <p>The need to ensure that community facilities and services are appropriate and accessible to users to meet the diverse needs of residents and workers.</p> <p>The need to improve the accessibility of key destinations within the CCBC area and to other key locations through enhancing the transport network.</p> |
| Human Health  | <p>The need to enhance all aspects of the health and wellbeing of the population, including physical health, mental health, social wellbeing, safety and security.</p>   |



| SEA Topic        | Key Sustainability Issues  |
|------------------|--|
|                  | <p>The need to protect and enhance access to high quality open space provision and active travel routes.</p> <p>The need to create healthy and liveable urban environments.</p>  |
| Soil             | <p>The need to encourage and/or facilitate development on previously developed brownfield land.</p> <p>The need to maximise the efficient the use of available land and prioritise the redevelopment of brownfield land.</p> <p>The need to safeguard geodiversity important soil resources and to remediate areas of known contamination.</p> <p>The need to protect and restore peatlands.</p>   |
| Water            | <p>The need to protect and enhance the quality of water sources and the water environment. This extends to the protection of cross-boundary watercourses which flow through the CCBC area and to the River Conwy which flows northwards into the Menai Strait in the Irish Sea.</p> <p>The need to locate new development away from areas of flood risk or to fully mitigate potential risks, considering the effects of climate change and risks of flooding from all sources (sea, rivers, surface water, reservoirs and/or ground water).</p> |
| Air              | <p>The need to minimise the emissions of air pollutants.</p> <p>The need to safeguard and improve air quality, including through addressing areas with poor air quality.</p>   |
| Climatic Factors | <p>The need to ensure that the built environment and infrastructure is resilient and adaptable to the effects of climate change, taking account of the coastal location of the CCBC area.</p> <p>The need to mitigate climate change including through the decarbonisation of key economic sectors.</p>  |
| Material Assets  | <p>The need to maximise the efficient use of land, natural resources and existing infrastructure. This includes the need to prioritise the redevelopment of brownfield land.</p>   |

| SEA Topic             | Key Sustainability Issues   |
|-----------------------|---|
| Cultural Heritage     | The need to preserve, protect and enhance cultural heritage assets and their settings within the CCBC area.<br><br>The need to safeguard and support the use of the Welsh language.   |
| Landscape             | The need to protect and enhance landscape character, townscape character, seascape character, key views and visual amenity. This extends to the protection of landscapes within the Snowdonia National Park and in other neighbouring authorities, as well as heritage coasts and marine character areas. |
| Inter-related Effects | The need to deliver holistic improvements to wellbeing and to contribute to the delivery of sustainable development across the CCBC area.   |

3.2.2 The key sustainability issues listed in **Table 3.1 above (and within the equivalent table in the main SA Report)** are evidenced within relevant Background and Topic Papers prepared for the LDP Review and reflected in the substantive proposals for the emerging RLDP set out within the Consultation Papers. In overall terms, this helps to ensure that the direction of travel for the emerging RLDP responds to key sustainability issues as identified through the SA process. However, it is still necessary to examine each emerging substantive component of the emerging RLDP individually and in combination to determine their likely significant effects and to what extent they contribute to the achievement of sustainable development.

### 3.3 Review of plans, programmes and strategies

3.3.1 The following types of plans and programmes were examined for their relevance to the LDP Review and this SA:

- International conventions and treaties;
- European Directives and associated legislation;
- Legislation enacted by the UK Parliament and the Welsh Assembly; and,
- Policy documents and strategies published at the national, regional and local levels, including by the UK Government, the Welsh Assembly Government (and its agencies) and CCBC.

3.3.2 A detailed review of the other plans and programmes identified as relevant to the LDP Review is provided in **Appendix B of** the main SA Report. From this review it is clear that the emerging RLDP should:

- Align with relevant national planning policy requirements as set out within Planning Policy Wales (PPW) – 10<sup>th</sup> Edition (December 2018);
- Seek to capitalise on the socio-economic opportunities presented by the emerging Growth Deal for North Wales;
- Align with the emerging National Development Framework (NDF) for Wales and the preparation of a possible SDP for the A55 Corridor;
- Seek to enhance all aspects of health and wellbeing for the population of the CCBC area, including through providing high quality health infrastructure, improving physical and mental health and providing opportunities to enhance social wellbeing. The LDP must seek to implement the locally defined wellbeing objectives set out within the Conwy Wellbeing Plan (2018-2023);
- Secure sustainable economic growth and inward investment across the CCBC area through allocating suitable sites for development and by delivering the infrastructure required to increase connectivity, improve community and social infrastructure and increase access to high quality employment and economic opportunities. It will also be important for the LDP to set out a spatial strategy which maximises the economic competitiveness of the CCBC area and improves social wellbeing, taking account of its rural setting and current socio-economic conditions;
- Identify and plan to meet the needs of all residents and workers within the CCBC area, in particular with respect to the provision of adequate community infrastructure;
- Deliver well-designed and affordable homes to meet identified housing needs, including providing a range of sizes and tenures;

- Reduce car dependencies and improve active travel infrastructure;
  - Deliver improved and expanded transport links, public transport and enhanced communications infrastructure, both to communities within the CCBC area and to key destinations in neighbouring authorities;
  - Protect and enhance access to high quality outdoor sports facilities, parks and open spaces;
  - Conserve, preserve, protect and enhance sites designated at international, national and local levels for reasons of biodiversity conservation, ecological importance, geological importance or heritage significance, in ways appropriate to their status;
  - Develop effective community engagement techniques to respond to the views of wider communities and facilitate effective community cohesion;
  - Promote the efficient use of resources, including moving towards a low carbon economy, use of waste as a resource, energy efficient buildings, and appropriate renewable and low carbon energy;
  - Take measures to protect air quality levels and aim to mitigate any activity which could affect air quality levels across the CCBC area;
  - Ensure there are no significant negative impacts on internationally and nationally designated nature sites (refer to separate Habitats Regulations Assessment Initial Screening Report for further details);
  - Give full consideration to the potential impacts on water, including water quality, ecosystems, sustainable use of water, capacity of sewerage, flood risk and the opportunities to improve flood risk management;
  - Seek ways to maximise multi-functional green infrastructure coverage and ensure they provide a network of linked wildlife corridors (across a wide range of scales and increase ecosystems services including biodiversity);
  - Seek ways to maximise the health benefits of green infrastructure;
  - Use land efficiently by prioritising the use of previously developed land;
  - Consider soil quality and agricultural land classification when assessing potential development sites;
  - Recognise the different landscapes in the CCBC area and Snowdonia National Park and their capacity to accommodate change; and,
  - Promote development that minimises landscape impacts and protects landscapes appropriate to their significance.
- 3.3.3 As with the identified key sustainability issues, the identified key policy issues are addressed within relevant Background and Topic Papers prepared for the LDP Review and reflected in the substantive proposals for the emerging RLDP set out within the Consultation Papers. In overall terms, this helps to ensure the emerging RLDP responds to applicable legislative and policy requirements.

## 4 The Sustainability Appraisal Process

### 4.1 Introduction

4.1.1 This section provides an overview of the SA process, incorporating SEA, which has been undertaken to date for the emerging Conwy RLDP. In doing so the section explains the approach which has been adopted for undertaking the SA of the Pre-Deposit Key Stakeholders Consultation.

### 4.2 SA and SEA Purpose and Objectives

4.2.1 In accordance with the SEA Regulations the purpose of SEA is to identify, assess and evaluate the likely significant environmental effects of a qualifying plan, programme or strategy (PSS). Under the 2004 Act, the purpose of SA is to assess the contribution of a LDP to delivering sustainable development. SA and SEA therefore share a common focus on assessing environmental and wider sustainability performance and can be undertaken and reported together, as in this report.

4.2.2 A common objective of SA, incorporating SEA, is to enhance the environmental and wider sustainability performance of emerging plans and programmes. This is achieved through identifying any likely significant effects from implementation of the emerging plan as drafted, proposing mitigation measures to address any identified significant adverse environmental effects, and identifying enhancement measures to improve the overall performance of the plan as it evolves. As such, SA incorporating SEA is an integral part of good development planning and should not be viewed as a separate or retrospective activity. This means that SA, incorporating SEA, should be undertaken in respect of each emerging substantive component or proposal for an emerging plan at the time when the relevant component or proposal is itself being consulted on.

### 4.3 SA Project Team

4.3.1 The SA of the emerging Conwy RLDP is being undertaken independently by Peter Brett Associates on behalf of Conwy County Borough Council (CCBC). PBA previously carried out the SA, incorporating SEA, of the first Conwy LDP, which was adopted by CCBC in 2013.

4.3.2 The independence of the consultant team involved in carrying out this SA helps to ensure the objectivity of the SA and to identify components requiring improvement throughout its development. This allows independent mitigation and enhancement recommendations to be developed and implemented as the emerging RLDP evolves in order to improve its effectiveness.

### 4.4 Previous SA and SEA Reporting

4.4.1 The only previous stages of SA undertaken in respect of the emerging RLDP were the preparation and consultation of a SA Scoping Report (incorporating SEA Screening) (August 2018), followed by the publication of a SEA Screening Determination by CCBC.

4.4.2 The dual purpose of the SA Scoping Report was to provide relevant information to enable the SEA Consultation Bodies to consider the need for SEA and to form a view on the consultation period and scope/level of detail appropriate for SA Report(s) to accompany each substantive component of the emerging RLDP. A key objective of the SA Scoping Report was to identify an evidence-based SA Framework to assess in a systematic way the likely sustainability effects from substantive components of the emerging RLDP. This SA Framework comprises a series of Sustainability Objectives and Guide Questions regarding identified socio-economic and environmental issues of relevance to the CCBC area.

- 4.4.3 Following the submission of the SA Scoping Report to the SEA Consultation Bodies in August 2018, the SEA Consultation Responses responded to the SA Scoping Report within statutory timescales and agreed with the view expressed that owing to likely significant effects on the environment from the implementation of the emerging RLDP, a full SEA should be carried out. As detailed in **Table 4.1 of the SA Report**, the SEA Consultation Bodies recommended a number of minor modifications to the proposed SA Framework and to the baseline analysis, policy review and key sustainability issues as set out within the SA Scoping Report. In accordance with information requirements prescribed within the SEA Regulations, these matters have been addressed in this SA Report and will be carried forward to future SA Reports to accompany the LDP Pre-Deposit and Deposit documents.
- 4.4.4 Taking account of the minor modifications requested by the SEA Consultation Bodies, the final Conwy LDP Review SA Framework which is being used to assess the emerging RLDP is provided in full within **Appendix C – SEA Framework** of the main SA Report.

## 4.5 Preparation of this SA Report

### Overview

- 4.5.1 In accordance with the Conwy LDP Review Delivery Agreement (2018) and the SEA Regulations, the Conwy LDP Review SA Scoping Report (August 2018) identified the need to undertake SA of all emerging substantive components of the emerging RLDP. This was originally envisaged to be through undertaking SA of LDP Pre-Deposit Documents, including the LDP Preferred Strategy (expected June 2019) and subsequently of LDP Deposit Documents (expected January 2020). However, CCBC subsequently decided that an additional, non-statutory consultation should be held regarding the proposed LDP Vision and Objectives and a suite of potential growth and settlement options, with the outcome of this consultation used to inform the development of Pre-Deposit Documents, including the LDP Preferred Strategy. As this Pre-Deposit Key Stakeholders Consultation sets out substantive components and proposals which are likely to underpin the emerging RLDP, it is clear that these need to be subject to SA at the present time.
- 4.5.2 The draft Pre-Deposit Key Stakeholder Consultation Papers were approved by CCBC's LDP Task and Finish Group in September 2018, following which PBA commenced work on the SA of the Vision, Objectives and Options Consultation in October 2018 (after the completion of the SA Scoping process). To inform this SA, relevant Background Papers accompanying the Consultation Papers were provided by CCBC to PBA in late October 2018.
- 4.5.3 The SA Report presents the findings of an appraisal carried out to identify, assess and evaluate the likely significant effects of the substantive proposals contained within the Consultation Papers. In doing so, each substantive component within each Consultation Paper, together with any reasonable alternatives (see below), have been subject to assessment against the 14 SA Objectives defined within the finalised Conwy LDP Review SA Framework (provided in **Appendix C of the SA Report**). The findings of this SA are documented in the SA Report.

### Consideration of Reasonable Alternatives

- 4.5.4 The SEA Regulations require the likely significant effects of implementing both a plan or programme (i.e. the emerging RLDP) and reasonable alternatives to it to be examined, as well as the rationale for identifying reasonable alternatives to be described. The SEA Regulations further state that to be considered as reasonable alternatives, options (e.g. alternative policy criteria or site allocations) must relate to the plan or programmes' corresponding objectives and geographical scope. To be eligible for consideration in this SA process (incorporating SEA), reasonable alternatives must therefore be:
- Realistic, in that they are plausible alternatives which could be implemented instead of proposals within the emerging RLDP and are consistent with relevant national and other policy frameworks;

- Related to the objectives of the emerging RLDP; and,
- Within the geographical scope of the emerging RLDP, i.e. any reasonable alternatives would need to relate to the distribution or characteristics of future development within the CCBC area.

4.5.5 Owing to the strategic and consultative nature of the substantive proposals and options set out within the Consultation Papers, it has not been possible to identify any further reasonable alternatives. In particular:

- **Vision and Objectives:** As reasonable alternatives must relate to the objectives of the plan under consideration, no reasonable alternatives to the proposed Vision or Objectives contained within Pre-Deposit Consultation Paper 1 could be identified, as any alternatives would change the strategic direction of the emerging RLDP. However, the SA has sought to identify any deficiencies within the proposed LDP Vision Objectives, with recommendations for how these components could be strengthened set out in Section 6 – Mitigation and Enhancement Recommendations; and,
- **Growth and Spatial Options:** The suite of potential growth and spatial options contained within Pre-Deposit Consultation Paper 2 themselves represent ‘reasonable alternatives’, with different options being consulted on to inform the development of an LDP Preferred Strategy (subject to future consultation at LDP Pre-Deposit stage). The potential growth and spatial options presently subject to consultation represent a ‘shortlist’ of options, derived from a more varied ‘long-list’ of potential options set out within three supporting background papers<sup>2</sup>. As detailed within these Background Papers, a number of potential growth and settlement options from the original long-list of options have been discounted on the grounds of not being a reasonable alternative, with reference to the three criteria listed above.

## SA Reporting

- 4.5.6 All substantive components and proposals set out within the Consultation Papers were appraised using matrices to identify their compatibility with the SA Objectives defined within the Conwy LDP Review SA Framework (**Appendix C of the SA Report**).
- 4.5.7 Owing to the high-level nature of the proposed LDP Vision and Objectives and of the potential growth and spatial options, it was not possible to identify with any certainty whether these strategic components would themselves be likely to result in significant effects. Rather, the focus of the SA at this stage is on ensuring sufficient coverage of the identified key sustainability issues within the proposed LDP Vision and Objectives when read as a whole to allow these issues to be addressed in more detail through other, non-strategic components of the LDP which will ultimately flow from the Vision and Objectives. The matrices and scoring system adopted also allowed for any incompatibilities, inconsistencies or uncertainties to be noted and for associated mitigation and enhancement recommendations to be developed.
- 4.5.8 The SA of the proposed LDP Vision and Objectives and of potential growth and spatial options are reported using a standard set of SA compatibility matrices in **Appendices D and E**, with the key findings summarised in **Section 5** below. Where the SA identified uncertainties, inconsistencies or the potential incompatibility of an assessed component with a SA Objectives (or, more widely, with the Conwy LDP Review SA Framework), corresponding mitigation and enhancement recommendations to address these issues are set out in **Section 6**. These recommendations should be implemented in future iterations of the emerging RLDP to address the identified issue.

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<sup>2</sup> BP/1 Growth Level Options Report Paper; BP/2 Spatial Distribution Options Paper and BP/3 Hierarchy of Settlement Paper.

## 5 SA Findings

### 5.1 Introduction

- 5.1.1 This section provides the results of the SA prepared for the Pre-Deposit Key Stakeholders Consultation. The following emerging RLDP components have been subject to SA and are considered below in turn:
- LDP Vision;
  - LDP Objectives;
  - Potential LDP Growth Options; and,
  - Potential LDP Spatial Options (including settlement hierarchy);
- 5.1.2 This section of the SA Report summarises the findings from the SA, whereas the detailed SA matrices for each plan component are provided separately in the following appendices:
- Appendix D – SA of Proposed LDP Vision and Objectives; and,
  - Appendix E – SA of Growth and Spatial Options.
- 5.1.3 **Sections 5.2 – 5.3** below identify (pre-mitigation) effects from these substantive components, as set out within the Pre-Deposit Key Stakeholders Consultation Papers ('the Consultation Papers'). Mitigation and enhancement recommendations to address any identified inconsistencies, uncertainties or potential incompatibilities with SA Objectives from the Conwy LDP Review SA Framework are then detailed in **Section 6** of this report.

### 5.2 SA of Proposed LDP Vision and Objectives

- 5.2.1 This section considers the sustainability implications of the proposed LDP Vision and Objectives as set out within Consultation Paper 1 – Priority Issues, Vision & Objectives. The proposed components seek to provide an overarching strategic framework to underpin all other components of the emerging RLDP including strategic policies, site allocations and development management policies. As such it is vital that the LDP Vision and Objectives include sufficient and unambiguous coverage of all key sustainability issues to allow them to be addressed in more detail through other, non-strategic components of the LDP.

#### Vision

- 5.2.2 Informed by the Conwy and Denbighshire Well-being Plan, the Well-being of Future Generations (Wales) Act 2015, Draft Planning Policy Wales (PPW) – 10<sup>th</sup> Edition and the Welsh Government's National Sustainable Placemaking Outcomes, Consultation Paper 1 sets out a proposed spatial vision for the development of the CCBC area up to 2033. This vision statement is shown in **Figure 5.1** below and then examined with respect to its coverage of key sustainability issues and alignment with the Conwy LDP Review SA Framework. A full SA of the proposed LDP Vision is provided in **Appendix D** of the main SA Report., whilst an assessment of the relationship between the proposed LDP Vision and the priorities and themes within the Conwy and Denbighshire Well-being Plan (2018) is provided in Appendix 2 of Consultation Paper 1.



Figure 5.1: Proposed Conwy LDP Vision

**Conwy 2033**

*By 2033, Conwy will be an area that has contributed positively to the creation and enhancement of ‘Sustainable Places’. This will have been achieved through inclusive and ‘Sustainable Placemaking’, which focuses on the promotion and delivery of ‘Active and Social Places’, ‘Productive and Enterprising Places’ and ‘Distinctive and Natural Places’.*

- 5.2.3 The proposed LDP Vision focuses heavily on placemaking as an enabler of positive wellbeing outcomes. As a high-level statement, the LDP Vision is therefore likely to support a greater emphasis on the delivery of a new spatial strategy and place-based policies within the emerging RLDP than the existing adopted LDP, which would enhance local distinctiveness and the implementation of policies to meet the differential needs of communities. The proposed LDP Vision is therefore considered to be compatible with achieving sustainable development. Furthermore, the direct alignment of the proposed LDP Vision with the priorities detailed within the Conwy and Denbighshire Well-being Plan (2018) and the themes within the Draft Planning Policy Wales – 10<sup>th</sup> Edition (2018) should allow the emerging RLDP to contribute to positive wellbeing outcomes and support the implementation of national planning policies. As wellbeing is used as the cross-cutting thread to bind all SA Objectives within the Conwy LDP Review SA Framework, the proposed LDP Vision should therefore be able to contribute, whether directly or indirectly to the achievement of these SA Objectives.
- 5.2.4 However, the proposed LDP Vision lacks specificity in relation to how individual key sustainability issues (as identified through SA Scoping) and key planning problems (as identified in Table 2 of Consultation Paper 1) should be addressed through the emerging RLDP. This is symptomatic of placemaking being viewed as an outcome rather than an enabler of specific spatial outcomes, as the actual purpose of creating and enhancing “sustainable places” is not fully defined in the vision. Rather, key sustainability/planning issues and problems which the emerging RLDP should respond to are identified after the proposed LDP Vision is set out within the Consultation Paper and are therefore left for the suite of associated LDP Objectives to address. We also note that the proposed LDP Vision is reliant upon the use of capitalised terms defined in Planning Policy Wales – 10<sup>th</sup> Edition (2018) and the Conwy and Denbighshire Well-being Plan (2018) which may not be familiar to all LDP readers and require further explanation, as demonstrated within Consultation Paper 1. Therefore, whilst the proposed LDP Vision provides an appropriate high-level statement to underpin the emerging RLDP, the enhancement recommendations set out in Section 6 focus on improving its direct coverage of key sustainability issues and spatial outcomes, as well as on clarifying key terms in a succinct manner.

## Objectives

- 5.2.5 The proposed LDP Vision is supported by a set of 16 Objectives which indicate how the vision will be achieved. These Objectives are set out in Table 3 of Consultation Paper 1 and listed in **Table 5.1** below.

Table 5.1: Proposed LDP Objectives (Table 3 of Consultation Paper 1)

| Objective Title  | Objective Wording  |
|--|--|
| <i>Contribute to the creation and enhancement of Sustainable Places in Conwy through inclusive Placemaking</i> |  |
| <i>Strategic Objective 1 (SO1)<br/>Creating Sustainable Places in Conwy</i>                                    | <i>Contribute to the creation of sustainable places, social inclusion and improved wellbeing overall in Conwy through the delivery of inclusive placemaking and regeneration that ensures future growth levels and development takes place in sustainable and accessible locations, seeks to promote good design and healthier places, protects Welsh language and is supported by the necessary social, environmental, cultural and economic infrastructure to create great places.</i> |
| <i>Active and Social Places in Conwy</i>   |  |
| <i>Strategic Objective 2 (SO2)<br/>Housing</i>   | <i>Promote a holistic and co-located employment and housing growth strategy by delivering new homes, including affordable homes and gypsy and traveller accommodation needs in sustainable and accessible locations, and ensuring that the right range of housing types, sizes and tenure are brought forward alongside the necessary community infrastructure.</i>  |
| <i>Strategic Objective 3 (SO3)<br/>Retailing and Commercial Centres</i>  | <i>Achieve vibrant, attractive and viable town and commercial centres in Conwy by redefining their role and by encouraging a diversity of activities and uses.</i>   |
| <i>Strategic Objective 4 (SO4)<br/>Community Facilities</i>  | <i>Contribute to a sense of place and overall health, wellbeing and amenity of local communities by ensuring that the existing and future population groups have access to a sustainable mix of community facilities.</i>  |
| <i>Strategic Objective 5 (SO5)<br/>Recreational Spaces</i>   | <i>Encourage physical and mental wellbeing through the provision and protection of high quality, accessible green spaces and recreation space networks.</i>  |
| <i>Strategic Objective 6 (SO6)<br/>Transport</i>   | <i>Deliver sustainable development and seek to tackle the causes of climate change by extending the choice of sustainable transport to enable Conwy's communities to access jobs and key services through the promotion of shorter and more active and efficient walking, cycling and public transport use and by influencing the location, scale, density, mix of uses and design of new development.</i>   |
| <i>Productive and Enterprising Places in Conwy</i>   |  |
| <i>Strategic Objective 7 (SO7)<br/>Economic Development</i>  | <i>Support long-term economic prosperity, diversification and regeneration, by taking advantage of Conwy's strategic position within the wider regional growth deal and by promoting a holistic and co-located employment and housing growth strategy, which will facilitate new jobs growth of the right type in sustainable and accessible locations, support business networks and clusters, increase skills in high value employment and provide the</i>                             |

| Objective Title   | Objective Wording  |
|---|--|
|   | <i>necessary new infrastructure, which overall will enable new businesses to locate in Conwy and existing business to grow.</i>  |
| <i>Strategic Objective 8 (S08) Tourism</i>  | <i>Encourage and support the provision of sustainable tourism where it contributes to economic prosperity and development, conservation, rural diversification, regeneration and social inclusion, while recognising the needs of visitors, businesses, local communities and the need to protect historic and natural environments.</i> |
| <i>Strategic Objective 9 (S09) Rural Economy</i>  | <i>Promote and support sustainable and vibrant rural communities by establishing new enterprise, expanding existing business and by adopting a constructive approach to agriculture and changing farming practices.</i>  |
| <i>Strategic Objective 10 (S010) Energy and Climate Change:</i>                         | <i>Secure an appropriate mix of energy provision, including the promotion of a Tidal Lagoon, which maximises benefits to Conwy’s economy and communities whilst minimising potential environmental and social impacts.</i>   |
| <i>Strategic Objective (S011) Minerals and Waste</i>                                    | <i>Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and providing an adequate supply of minerals and materials for construction.</i>   |
| <i>Distinctive and Natural Places in Conwy</i>  |  |
| <i>Strategic Objective 12 (S012) Landscapes and Historic Environments</i>               | <i>Conserve and enhance Conwy’s high quality natural and cultural heritage assets.</i>   |
| <i>Strategic Objective 13 (S013) Coastal Areas</i>                                      | <i>Support growth, regeneration and development opportunities in Coastal Areas, whilst at the same time being aware and responsive to the challenges resulting from natural pressures.</i>   |
| <i>Strategic Objective 14 (S014) Green Infrastructure and Biodiversity</i>              | <i>Protect and enhance biodiversity and build resilient ecological networks.</i>   |
| <i>Strategic Objective 15 (S015) Water, Air, Soundscape and Light</i>                   | <i>Reduce exposure to air and noise pollution, balance the provision of development and lighting to enhance safety and security, and protect and enhance the water environment and water resources, including surface and groundwater quantity and quality.</i>  |
| <i>Strategic Objective 16 (S016) Unlocking Development Potential through De-risking</i> | <i>Unlock growth, regeneration and development potential in Conwy by taking a de-risking approach.</i>   |

- 5.2.6 Section 5 of Consultation Paper 1 makes clear that the proposed LDP Objectives are intended to reflect both the proposed LDP Vision and to address the key sustainability and planning issues identified from wider baseline analysis, policy reviews and through SA Scoping. These identified issues and the resulting proposed LDP Objectives are grouped thematically in Tables 2 and 3 of Consultation Paper 1 to correspond with the proposed thematic structure of the emerging RLDP and in turn the structure of Draft Planning Policy Wales (PPW) – 10<sup>th</sup> Edition (2018).
- 5.2.7 As with the proposed LDP Vision, the proposed LDP Objectives are aspirational and generally compatible with achieving beneficial sustainability outcomes. Additionally, the appraisal provided in **Appendix D (of the SA Report)** demonstrates that, read as a whole, the suite of proposed LDP Objectives has good coverage of most of the SA Objectives within the Conwy LDP SA Framework. Indeed, the wording of some proposed LDP Objectives (especially SO2, SO6, SO11, SO12, SO14 and SO16) closely matches the corresponding thematic SA Objectives within the Conwy LDP Review SA Framework (**Appendix C of the SA Report**) whilst SO1 provides a strong focus on enhancing wellbeing and environmental quality.
- 5.2.8 Read as a whole, the proposed LDP Objectives therefore appropriately respond to identified key sustainability issues and planning problems. However, read in isolation, all but one of the proposed 16 LDP Objectives cannot implement the proposed LDP Vision or more widely achieve sustainable development. The possible exception is SO1, which as worded seeks to deliver “*sustainable placemaking*” and to address a range of specified socio-economic and environmental issues in a holistic manner. SO1 could therefore be interpreted itself as a thematic vision statement, albeit it presently sits beneath the proposed LDP Vision. The relationship between SO1 and the proposed LDP Vision is therefore unclear and should be clarified in the next iteration of the emerging RLDP.
- 5.2.9 The individual thematic focus of the proposed LDP Objectives and their sheer number, coupled with the limited consideration afforded to key sustainability issues and spatial outcomes within the proposed LDP Vision (see above) may present a difficulty in using the new LDP strategic framework (i.e. the LDP Vision and Objectives) to tackle key sustainability issues and planning problems. This could lead to policy tensions whereby conflicting policies may be developed in response to individual proposed LDP Objectives rather than to implement the higher-level LDP Vision and in doing so to contribute to the achievement of relevant LDP Objectives. Recommendations to address this issue in the next iteration of the emerging RLDP are provided in **Section 6**.

### 5.3 SA of Growth and Spatial Options

- 5.3.1 Consultation Paper 2: Growth Level and Spatial Distribution Options sets out a range of growth and spatial options which could underpin the Preferred Strategy for the emerging RLDP. The paper outlines three main types spatial considerations for the emerging RLDP, with multiple options identified for each:
- Settlement Hierarchy;
  - Growth Options (Levels of Housing and Employment Growth to 2033); and,
  - Spatial Distribution Options for Growth.
- 5.3.2 These growth and spatial options are subject to a detailed SA in **Appendix E of the SA Report**, with the key findings outlined below. Of note, the settlement hierarchy options listed within Consultation Paper 2 have not been appraised separately as the identification of any individual settlement within the CCBC area as having a particular place in the LDP Settlement Hierarchy is not itself likely to result in significant effects. Rather, it is the level of growth (housing, employment and other development) across the CCBC area and its distribution within specific places across the settlement hierarchy which has the potential to result in significant effects and therefore requires to be subject to SA.

- 5.3.3 Within **Appendix E, Table E2.1 of the SA Report** provides an appraisal of the identified growth options whilst an appraisal of the identified spatial distribution options is set out in **Table E3.1 of the SA Report**. As with the SA of the proposed LDP Vision and Objectives, this SA focuses on assessing the compatibility of each individual growth and spatial distribution option with the Conwy LDP Review SA Framework, without ranking the options or recommending a set preferred set of options.
- 5.3.4 The headline conclusions from the SA of Growth Options (**Table E2.2 of the SA Report**) are:
- GO2, GO3 and GO4 are assessed as having broadly similar sustainability effects as they involve broadly similar levels of growth. Whilst there is inevitable uncertainty at this stage, effects on socio-economic related SA Objectives are likely to be positive under these growth options, with some concerns in regards to likely adverse effects on environmental related SA Objective; and,
  - GO1 is considered likely to result in uncertain or potentially adverse effects on the socio-economic related SA Objectives owing to insufficient growth being planned for. However, this does not mean the growth option would necessarily perform well in environmental terms, owing to the increased likelihood of ‘planning by appeal’ should a greater scale of growth emerge organically. Conversely, GO5 envisages a scale of growth which is potentially over-ambitious and undeliverable. This is likely to result in a disjointed approach to growth, with consequential adverse effects in relation to many of the SA Objectives.
- 5.3.5 The headline conclusions from the SA of Spatial Distribution Options (**Table E3.2 of the SA Report**) are:
- SDO2, SDO3, SDO4, SDO5 are assessed as having broadly similar sustainability effects as they involve concentrating growth in similar locations. Whilst there is inevitable uncertainty at this stage, effects on socio-economic related SA Objectives are likely to be positive under these spatial distribution options, with some concerns in regards to likely adverse effects on environmental related SA Objectives; and,
  - SDO1, is broadly a general distribution approach which may result in adverse effects in relation to most of the SA Objectives. Similarly, SDO6 proposes a new settlement but without a clear justification, resulting in a very risky approach which is likely to result in adverse effects across the spectrum of SA Objectives.
- 5.3.6 Regardless of the individual settlement hierarchy, growth level and spatial distribution options selected to underpin the LDP Preferred Strategy within the Replacement Conwy LDP Pre-Deposit Document (expected to be published for consultation in June 2019), the general mitigation and enhancement measures defined in **Section 6** should be implemented in the next iteration of the emerging RLDP to ensure the avoidance of likely significant adverse effects and to enhance the sustainability performance of the plan.

## 6 Mitigation and Enhancement Recommendations

### 6.1 Overview

- 6.1.1 The identification of any assumptions and uncertainties is an important element of SA, as all components of the emerging RLDP need to be unambiguous to ensure they can be implemented as intended. In addition, the SEA Regulations require consideration to be given to “*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*”. A key role of the SA process, incorporating SEA, is therefore to devise appropriate mitigation and enhancement recommendations in order to address identified uncertainties, resolve deficiencies and strengthen the sustainability performance of the plan or programme being assessed.
- 6.1.2 There are several general methods which can be used to mitigate potential adverse or uncertain effects from LDP components and more widely enhance the contribution of the emerging RLDP to the delivery of sustainable development. In relation to the strategic LDP components being consulted on at this stage through the Pre-Deposit Consultation Papers, these methods centre on:
- Adjusting or expanding the wording of existing proposed LDP components to ensure these can be implemented successfully and as intended in pursuit of sustainable development. This could include clarifying delivery mechanisms or strengthening wording to help deliver the desired output from each component of the emerging RLDP; and/or
  - Devising and implementing additional LDP components within the emerging RLDP to address key sustainability issues not fully addressed within the LDP components as currently proposed or to mitigate potential adverse effects from the currently proposed components. In due course this could include the development of site specific briefs to ensure that individual site allocations, as part of wider growth and spatial options, avoid likely significant adverse effects.
- 6.1.3 The assessment of each substantive LDP component or proposal within the Pre-Deposit Consultation Papers has been undertaken on a pre-mitigation basis to allow any ambiguities and other weaknesses to be identified. This has enabled the independent consultant team undertaking the SA to develop appropriate mitigation and enhancement recommendations, as detailed below. To address the uncertainties, inconsistencies and issues identified in **Section 5** and **Appendices D** and **E**, these recommendations should be addressed within the next iteration of the emerging RLDP. This will help to demonstrate how the SA has informed and positively influenced the development of the emerging RLDP.

### 6.2 Recommended Modifications to Proposed LDP Vision

- 6.2.1 The SA of the proposed LDP Vision (**Section 5.2** and **Appendix D of the SA Report**) concludes that whilst this proposed LDP component is compatible with the Conwy LDP SA Framework, it has limited direct engagement with individual key sustainability issues and planning problems. The SA also concluded that the reliance on capitalised terms from other plans (namely the Draft PPW – 10<sup>th</sup> Edition<sup>3</sup>) may weaken the visionary nature of this component and its ability to steer all other substantive components of the emerging RLDP. To address these issues, it is recommended that in the next iteration of the emerging RLDP, the proposed LDP Vision should be expanded to:
- Identify specific sustainability and planning issues or challenges which the emerging RLDP should address. In this regard, it would be appropriate for the LDP Vision to explicitly

<sup>3</sup> The Draft PPW – 10<sup>th</sup> Edition has now been replaced by the finalised PPW – 10<sup>th</sup> Edition (December 2018). The previous PPW – 9<sup>th</sup> Edition has now been revoked.

recognise the need to support economic growth, improve environmental quality, safeguard amenity and improve quality of life for people living or working within the CCBC area. Thematic elements of proposed LDP Objective SO1 could also be incorporated into an expanded LDP Vision;

- Linked to the previous recommendation, placemaking should be viewed as an enabler of positive spatial outcomes rather than an end goal in itself. As such, the LDP Vision would benefit from greater clarity regarding the meaning of “inclusive placemaking” and the aim of creating and enhancing “sustainable places”. Normative terms should be included to provide a clear illustration of the change desired through the emerging RLDP compared with the baseline situation or a no-LDP scenarios; and,
- Consideration should be given to either reducing the reliance upon capitalised terms from other plans within the proposed LDP, or otherwise including an explicit cross-reference in the LDP Vision to explain the origin of these terms and why they are appropriate to underpin the emerging RLDP. Whilst the terms referenced in the proposed LDP Vision remain relevant in the context of the finalised PPW – 10<sup>th</sup> Edition (December 2018) and they do encapsulate a range of relevant sustainability and planning issues, the reliance on these terms prevents the Vision from setting out a clear and visionary statement. To address these concerns, the following draft alternative vision is suggested:

#### CONWY VISION 2033

*The County of Conwy will continue to be thriving area of North Wales, with a sustainable economy built on principles that promote growth and maximise opportunities for all whilst safeguarding the area’s unique landscape, heritage and wider environmental assets. A renewed focus on placemaking and regeneration will ensure that high quality development supports the creation of healthier and more vibrant places, with housing, employment and infrastructure growth directed to sustainable locations to meet the needs of residents, workers and visitors. Through enhanced inward investment, infrastructure provision and strong protection for the Welsh Language, Conwy will become the economic and cultural growth engine of North Wales. It will be a competitive and more inclusive place offering a good quality of life for all, improved environmental quality and enhanced wellbeing for current and future generations. This means that Conwy will have a prosperous network of towns and villages, as well as a viable rural economy which protects and enhances the natural environment.*

*This vision for Conwy will be achieved by all stakeholders involved in planning following the 5 ways of working (collaboration, prevention, integration, long term and involvement) and striving to deliver sustainable development. Placemaking and regeneration efforts will therefore be focused on delivering placed based solutions to social, economic, environmental and cultural challenges facing the area. The vision will therefore be implemented through addressing the following strategic aims and objectives, and in turn through implementing associated policies and proposals.*

- 6.2.2 This draft alternative LDP Vision captures the essence of PPW – 10<sup>th</sup> Edition and the wellbeing agenda introduced through the Well-being of Future Generations (Wales) Act 2015, as well as reflecting local environmental and socio-economic issues in Conwy. It avoids directly referencing themes and headings from other policy documents in order to safeguard its visionary purpose and place specific focus. It is suggested that national planning policy themes and headings could instead be appropriately referenced within relevant individual thematic LDP Objectives underneath the Vision, as detailed below.
- 6.2.3 The draft alternative LDP Vision has been proposed as mitigation by the SA project team at this stage and does not currently represent CCBC’s proposed LDP Vision. Any alternative LDP Vision taken forward as a substantive component of the emerging RLDP will require to be subject to SA, incorporating SEA, in relation to any substantive LDP consultation document where it is set out as a formal proposal. This means that the LDP Vision may need to be re-assessed in the next SA Report accompanying the LDP Preferred Strategy and Pre-Deposit Documents.

## 6.3 SA of Objectives

6.3.1 The SA of the proposed LDP Objectives (**Section 5.2** and **Appendix D** of the main SA Report) concludes that these components are generally compatible with achieving beneficial sustainability outcomes and in many cases their wording is closely matched to the SA Objectives defined in the Conwy LDP Review SA Framework (**Appendix C** of the main SA Report). However, the individual thematic focus of the proposed LDP Objectives and their sheer number (16), coupled with the limited consideration afforded to key sustainability issues and spatial outcomes within the proposed LDP Vision (see above) may present a difficulty in using the new LDP strategic framework (i.e. the LDP Vision and Objectives) to tackle key sustainability issues and planning problems. To address these issues and enhance the sustainability performance of the emerging RLDP, it is recommended that, in the next iteration of the emerging RLDP, the proposed suite of 16 LDP Objectives should be modified to:

- Incorporate proposed LDP Objective 1 within an expanded and spatially focused LDP Vision (as detailed above) rather than as a standalone objective. The inclusion of more normative and thematic content within the LDP Vision may also provide opportunities to reduce the number of thematic LDP Objectives underneath the Vision;
- Rationalise related thematic objectives to reduce their number. This will be needed for the proposed LDP Objectives to provide a clear and manageable set of priorities to steer all other substantive components of the emerging RLDP and to minimise potential policy tensions. To retain a focus on all relevant sustainability and planning issues identified within the proposed LDP Objectives as drafted, detailed thematic aspects could be recast as ‘Outcomes’ underneath a rationalised set of broader LDP Objectives. As noted above it would be appropriate for individual LDP Objectives to refer to relevant national planning policy themes and headings; and,
- Consideration should be given to elevating the status and expanding the content of the four subheadings used in Tables 2 and 3 of Consultation Paper 1 to group the proposed LDP Objectives. These headings could usefully become ‘Strategic Aims’ and thus substantive components of the emerging RLDP in their own right, with thematic LDP Objectives and related Outcomes sitting below these.

## 6.4 SA of Growth and Spatial Distribution Options

6.4.1 Regardless of the individual settlement hierarchy, growth level and spatial distribution options selected to underpin the LDP Preferred Strategy within the Replacement Conwy LDP Pre-Deposit Document (expected to be published for consultation in June 2019), the general mitigation and enhancement measures listed below should be implemented in the next iteration of the emerging RLDP to ensure the avoidance of likely significant adverse effects and to enhance the sustainability performance of the plan:

- The principal mitigation measure to avoid and mitigate impacts from the selected settlement hierarchy, growth and spatial distribution options will be through adopting an evidence based approach to the development of sub-area strategies and the selection of suitable candidate sites for LDP site allocations in order to deliver sustainable development. By minimising growth and site allocations in areas of known high nature conservation value, allocating sites that have good access to a range of services, jobs and facilities in walking distance or with direct public transport connections; avoiding areas of high landscape sensitivity, etc.;
- The SA of candidate sites being undertaken by CCBC should allow appropriate policy level mitigation and site specific design principles to be identified to help avoid and mitigate potential effects;



- If the growth and spatial distribution options involving the concentration of growth in urban areas are pursued, CCBC should undertake infrastructure capacity studies to ensure that development pressures on affected settlements can be planned for and that likely significant cumulative adverse effects can be avoided.

## 6.5 Next Steps

- 6.5.1 This Sustainability Appraisal Report ('the SA Report') has documented the findings of the SA carried out in respect of the first stage in the LDP Review, namely the Pre-Deposit Key Stakeholders Consultation. At this stage, the proposed LDP Vision and Objectives and a suite of potential growth and spatial options are being consulted on to inform the content of the emerging RLDP. Following a six-week consultation on these LDP components and this SA Report, CCBC will review the consultation responses and develop a LDP Preferred Strategy. This will confirm the Vision, Objectives, Growth and Spatial Option and Policy Priorities which will underpin the emerging RLDP.
- 6.5.2 The LDP Preferred Strategy and wider LDP Pre-Deposit Documents will be subject to SA, with the associated SA Report consulted on in tandem with the substantive LDP consultation documents in June 2018. Thereafter, all representations received will be reviewed and CCBC will proceed to develop the LDP Deposit Document, which will set out a full new proposed LDP for the CCBC area. Subject to further consultation in January 2020 (including on an associated LDP Deposit Document SA Report) and a subsequent Examination in Public, CCBC then intends to adopt the finalised Replacement Conwy LDP in 2021 prior to the expiry of the existing Conwy LDP.