

Integrated Impact Assessment of the Flintshire Local Development Plan

IIA Post Adoption Statement

JANUARY 2023

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1 Introduction

1.1 What is the Flintshire Local Development Plan

- 1.1.1 Flintshire County Council ('the Council') is currently preparing the new Flintshire Local Development Plan 2015 – 2030 ('LDP'). The Examination Hearings were held between 13th April and 20th May 2021, with additional sessions held 21st September and 23rd November 2021. Following the proposal of Matters Arising Changes and the Inspector's Report, the LDP is now ready to be adopted.
- 1.1.2 The LDP replaces the existing Flintshire Unitary Development Plan (UDP)¹ and is the framework against which land use planning decisions will be made across the County up to 2030. It shapes Flintshire's future physically and environmentally as well as influence it economically and socially. The LDP responds to the varied needs of a growing population and economy by providing for new jobs, homes, infrastructure and community facilities, in a way that ensures that the well-being of people is enhanced, and the effects of development are sustainably managed.
- 1.1.3 The LDP context is set by national legislation and planning guidance which requires local authorities in Wales to prepare and maintain a development plan that deals with the above challenges in accordance with the sustainable development duty embodied by the Well-Being of Future Generations Act (2015)². The LDP embodies a positive and responsible approach to development in Flintshire and aims to create more high-quality sustainable places in both urban and rural settings. A sustainable place is one with sufficient social, economic and environmental infrastructure to meet the needs of its people whilst being resilient and adaptable in the face of future challenges.

1.2 What is the Integrated Impact Assessment?

- 1.2.1 Flintshire County Council is committed to improving the social, economic, environmental and cultural well-being of Wales now and over the long term. One of the key methods of achieving this is to take an integrated approach to strategy and policy development. Integrated Impact Assessment (IIA) is a process for predicting and evaluating the likely social, economic and environmental impacts of a plan, and aims to ensure that sustainable development is at the heart of the plan-making process. It can also be used to capture cultural impacts, making it consistent with the four components of sustainable development in Welsh law.
- 1.2.2 This IIA incorporates the requirements of a combined Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA), as well as Welsh Language Impact Assessment, Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). Findings in this report are up to date with the latest findings from the Habitats Regulations Assessment (HRA) of the LDP which has been updated to consider phosphate issues and its impact on protected rivers in the County.
- 1.2.3 SEA is a requirement of several pieces of legislation including the European Directive 2001/42/EC on 'the assessment of the effects of certain plans and programmes on the environment' (The Strategic Environmental Assessment Directive)³ which was transposed directly into Welsh law through the SEA Regulations⁴. SEA is a systematic process for evaluating the environmental consequences of plans

¹ Available at: <http://www.cartogold.co.uk/flintshire/> [Accessed 03/01/23]

² Available at: <https://futuregenerations.wales/about-us/future-generations-act/> [Accessed: 03/01/23]

³ Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32001L0042> [Accessed: 03/01/23]

⁴ Available at: <https://www.legislation.gov.uk/wsi/2004/1656/contents/made> [Accessed: 03/01/23]

and programmes to ensure that environmental issues are integrated and assessed at the earliest opportunity in the decision-making process.

- 1.2.4 SA is an assessment of the economic, environmental, and social effects of a Plan carried out from the outset of the Plan-making process to ensure that decisions are made that accord with sustainable development principles. SA is a systematic and iterative process that identifies and reports on the extent to which implementation of the plan will achieve the environmental, social, and economic objectives by which sustainable development can be defined and identifies opportunities for improving plan performance in relation to these.

1.3 IIA and Local Plan process so far

- 1.3.1 The Wales Development Plans Manual - Edition 3 (2020), as well as the ODPM's A Practical Guide to the SEA Directive (2005), provide guidance on conducting an SA/SEA. This has been followed for the purposes of the IIA. The five main stages in conducting an IIA are defined as:

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

- 1.3.2 Key stages in the IIA process are presented in Table 1-1. The table also demonstrates how each of the SA (including SEA), HIA, EqlA and HRA assessment processes and stages are linked to each other, as well as to the preparation and development of the LDP.

1.4 Purpose of the Post Adoption Statement

- 1.4.1 This Post Adoption Statement represents the conclusion of the IIA process and fulfils the plan and programme adoption requirements of the SEA Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:

- How environmental considerations have been integrated into the plan or programme (Chapter 2 of this document);
- How the environmental report has been taken into account (Chapter 2 of this document);
- How opinions expressed in response to the consultation on the IIA Reports have been taken into account (Chapter 3 of this document);
- How the results of any consultations have been taken into account (Chapter 3 of this document);
- The reasons for choosing plan or programme as adopted, in the light of the other reasonable alternatives dealt with (Chapter 4 of this document); and
- The measures that could be taken to monitor the significant environmental effects of the implementation of the plan or programme (Chapter 5 of this document).

Table 1-1: Stages of the IIA process to date

LDP Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulations Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in the IIA Reporting		
Evidence Gathering and Objectives	A. Setting the context and objectives, establishing the baseline and deciding on the scope	Identify related plans/programmes	N/A	Identify health related plans/programmes (as part of IIA) linked into local Joint Strategic Needs Assessments	Review of relevant policies and strategies	Completed in 2015 Scoping Report ⁵ and revisited in Appendix B of the Deposit IIA Report ⁶ .	
		Identify environmental protection objectives	N/A	Derivation of health - related themes	Derivation of equality-related themes	Completed in 2015 Scoping Report and revisited in Appendix A of the Deposit IIA Report.	
		Baseline data and likely future trends	Identify all European sites within and up to 20km from the Flintshire area	Gather baseline data relating to health (as part of IIA)	Baseline data and likely future trends		
		Identify sustainability issues and opportunities	Contact NRW for details on European sites and consultation	Identify health issues and relevant determinants (as part of IIA)	Identify equalities specific issues		
		Develop objectives, indicators and targets (Assessment Framework)	Ensure IIA Framework covers European sites appropriately	Inclusion of health specific objectives, indicators and targets in IIA Framework	Ensure inclusion of equalities specific objectives, indicators and targets in IIA Framework	Completed in 2015 Scoping Report and 2017 Re-Scoping.	
		Prepare IIA Scoping Report, incorporating HRA and HIA	HRA information incorporated into IIA Scoping Report	HIA information incorporated in IIA Scoping Report.	EqIA information incorporated in IIA Scoping Report.		
		Consult on the IIA Scoping Report, including HIA, EqIA and HRA (5 weeks)					
		Review of scoping consultation responses and preparation of Final Scoping Report to inform next stage					
Strategic Options and Preferred Strategy	B1/B2. Developing, refining and appraising strategic options, policy options and	Assess objectives against the Assessment Framework	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework	Completed in October 2016 Strategic Options Report ⁷ .	
		Develop, refine and appraise strategic options	Consider HRA implications of the options.	N/A	N/A		

⁵ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA-SA-scoping-Report-Mar-2015.pdf> [Accessed: 03/01/23]

⁶ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA4.1-Deposit-IIA-Appendix-A-D.pdf> [Accessed: 03/01/23]

⁷ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA2-SA-Strategic-Options-Oct-2016.pdf> [Accessed: 03/01/23]

LDP Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulations Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in the IIA Reporting		
	preferred policy options.	Evaluate/select preferred policy options	N/A	N/A	N/A		
	Prepare Initial IIA Report on Strategic Options						
	Consultation on Initial IIA Report (non-statutory)						
	B3/B4. Assessing the effects of the Local Plan Preferred Strategy	Predict and assess effects of preferred options taken forward	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework	Completed in October 2017 Preferred Strategy Interim Report ⁸ .	
		Proposed mitigation measures	N/A	N/A	N/A		
		Propose monitoring programme	Monitoring as part of IIA				
	Prepare Further Interim IIA Report on Preferred Options						
	B3/B4. Assessing the effects of the Deposit Local Plan including detailed policies and allocations	Predict and assess effects of preferred options taken forward	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework		
		Proposed mitigation measures	N/A	N/A	N/A		
		Propose monitoring programme	Monitoring as part of IIA				
LDP Preparation and Deposit	C. Prepare IIA Report		HRA Screening Report produced separately.	HIA documented in appropriate IIA Objectives in IIA Report	EqIA documented in appropriate IIA Objectives in IIA Report		Completed in September 2019 Deposit Report ⁹ .
	D. Consultation on the IIA Report		<i>Screening consulted on with NRW.</i>	<i>Included in IIA Consultation.</i>			Completed between September and November 2019.
	D. Prepare a supplementary or revised IIA Report if necessary	Assess significant changes	Prepare updated HRA Report following consultation.	HIA documented in appropriate IIA Objectives in IIA Report	EqIA documented in appropriate IIA Objectives in IIA Report		N/A
Prepare supplementary or revised IIA Report							

⁸ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA3-IIA-Preferred-Strategy-Oct-2017.pdf> [Accessed: 03/01/23]

⁹ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA4-Deposit-IIA-Sept-2019.pdf> [Accessed: 03/01/23]

LDP Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulations Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in the IIA Reporting
Submission, Examination and Adoption	D. Adoption Statement				Matters Arising Changes from the Examination in December 2021 Matters Arising Changes Addendum ¹⁰ . <i>This Report represents the Post Adoption Statement.</i>

¹⁰ Available at: <https://www.flintshire.gov.uk/cy/PDFFiles/Planning/Examination-Library-Documents/Addendum-Integrated-Impact-Assessment.pdf> [Accessed: 03/01/23]

2 How environmental considerations have been integrated into the LDP

2.1 Overview

- 2.1.1 The purpose of the IIA is to integrate sustainability considerations into the LDP and help it to achieve its key objectives. This is accomplished using a collaborative and iterative relationship between those carrying out the IIA and the plan-makers, based on a phased approach at key stages throughout its development.
- 2.1.2 The stages of the IIA (SA/SEA) process are set out in section 1.3.1 and Table 1-1. The following sections set out how the IIA has influenced the development of the LDP through each of these stages.

2.2 Scoping

- 2.2.1 Scoping represents the initial stage in the IIA process for an emerging Plan and sets the scope for the remainder of the process. The output of this stage was a Scoping Report that formed the basis for consultation with statutory bodies on the proposed scope of the IIA.

Spatial and Temporal Scope

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

SEA Scope

- 2.2.4 The SEA Regulations require that the 'likely significant' effects on the environment are assessed, considering the following topics and interrelationship between them:
- Population;
 - Biodiversity;
 - Human health;
 - Fauna and flora;
 - Soil;
 - Water;
 - Air;
 - Climatic factors;
 - Material assets;
 - Cultural heritage including architectural and archaeological heritage; and
 - Landscape.

2.2.5 Appendix B of the September 2019 IIA Report contains the updated environmental baseline for Flintshire used to inform the IIA. The baseline data was identified, gathered and analysed during the Scoping stage in 2015 and updated in the 2017 re-scoping exercise. It includes the following headings:

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

2.2.6 The SEA Regulations require 'material assets' to be considered. Material assets refer to the stock of valuable assets within a study area and can include many things from valuable landscapes, natural and cultural heritage through to housing stock, schools, hospitals and quality agricultural land. It was considered that the material assets of the area were appropriately covered as a component of multiple sections and consequently were repeated as a separate section.

HIA Scope

2.2.7 The HIA elements of the IIA assessed the LDP in terms of its effects on the health of the local community, with wider effects considered, where relevant. This included communities in the surrounding area, incoming residents and people coming in for work, visiting or just travelling through. Mitigation of issues that impact negatively on health was considered (including physical, mental and emotional).

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

EqIA Scope

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

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

HRA Scope

2.2.11 Within Flintshire there are eight sites of international nature importance, and a further 15 sites within 20km of the County. An HRA screening exercise was undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process is documented in the HRA Screening Report. This is a parallel process to the IIA process and has been reported separately. The HRA has ruled out a likely significant effect of the LDP on the conservation status of any European designation.

Review of Relevant Plans, Programmes and Environmental Protection Objectives

“An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmers” SEA Regulations, Schedule 2 (1)

“The environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme...and the way those objectives and any environmental considerations have been taken into account during its preparation” SEA Regulations, Schedule 2 (5)

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

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the IIA process.
- Identification of any baseline data relevant to the IIA.
- Identification of any external factors that might influence the preparation of the LDP, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the LDP.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the LDP.

The Sustainability Baseline and Key Sustainability Issues

“The environmental characteristics of areas likely to be significantly affected” SEA Regulations, Schedule 2 (3)

“Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC... and the Habitats Directive” SEA Regulations, Schedule 2 (4)

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

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

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

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

2.2.15 Following a careful review of this baseline, the key sustainability issues and opportunities for the county were identified. Briefly, these were based around the following topic areas:

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

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

Cross-boundary considerations

- 2.2.16 The County has a number of connections and links with other areas, such as Merseyside and Chester, and the surrounding counties within Wales. There are good links into and out of the County, which provide opportunities for inward investment, as well as enabling people in the County to have good access to job opportunities in other areas.
- 2.2.17 The '2013 Dee Region Cross-Border Economy: next steps' identifies that there is a strong cross-border functional economic region consisting of Wrexham, Chester, Deeside and Ellesmere Port. There is a fluid border in which trade occurs with little conscious consideration of the national boundary and similarly, travel patterns do not recognise the English/Welsh border, with 83% of all trips starting and finishing in the Dee sub-region. Large west - east commuter flows to the main employment centres in Deeside, Wrexham, Chester and Ellesmere Port exist. In practical terms, the cross border economic activity places considerable pressure on Flintshire's housing market; on infrastructure such as waste facilities; and in terms of job creation (Flintshire is a net employer with a 4% unemployment rate compared to 4.8% average unemployment rate for Wales).
- 2.2.18 Whilst the economy is performing well, it is recognised that the daily outmigration of people from the County for employment purposes could be inhibiting the level of economic growth and personal spending in the County. There are also flows of workers travelling into Flintshire but there is a net flow out of the County. Indeed, the lack of a major urban centre within the County results in many people travelling to Chester for retail purposes. The County has vast tourism potential owing to its high-quality environment and the amount of tourism spending is considered to be increasing. The in-migration of people into the rural parts of the County could continue to create housing affordability problems.

The IIA Framework

- 2.2.19 The IIA Framework comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that were used to test the performance of the plan being assessed. Whilst the SEA Regulations do not require the use of objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.
- 2.2.20 The IIA Objectives are separate from the objectives of the LDP, although there may be some overlaps between them. To help measure the performance of the LDP's components against the IIA Objectives, it is beneficial if they are supported by a series of indicators. Baseline data should be collated to support each of the indicators, as this provides a means of determining current performance across the Flintshire area and gauging how much intervention or the extent of work needed to achieve the targets that have been identified.
- 2.2.21 The IIA Framework was developed using the IIA Framework from the Scoping Report (2015) as a base. This was analysed and refined, using the following:
- Comparison against the updated PPPs and identified key sustainability issues and opportunities;
 - Comparison against the SAs developed for neighbouring Local Plans;
 - Findings from the Scoping Workshop;
 - Consultation Comments on the Scoping Report (2015) and the Options Appraisal (2016); and
 - Consideration of the Well-being of Future Generations (Wales) Act 2015 and the Re-scoping Exercise of the IIA Framework carried out in August 2017.
- 2.2.22 The IIA Framework used to assess the LDP is presented in Table 2-1. Each of the IIA Objectives is supported by a series of sub-objectives, to add further clarity and to assist the assessment process. The objectives are not mutually exclusive, and the assessment framework should be considered in its entirety. As such, the IIA Objectives are not presented in any particular order, with all Objectives being considered as having equal weighting.
- 2.2.23 IIA Objectives are also supported by indicators, which link to those used to describe the baseline conditions across the area. Where baseline data is not currently available, indicators have been suggested as to the type of information that may be appropriate. Throughout the course of the IIA, quantified targets have been identified to supplement this framework in liaison with Flintshire County Council.

Table 2-1: IIA Framework

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

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

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
<ul style="list-style-type: none"> • Maintain and improve access to essential services and facilities, including in rural areas • Improve access to open space • Conserve and enhance opportunities for public access to the countryside and coast 			Flint Strategy and Masterplan to 2021 Buckley Town Action Plan 2009-2012		A globally responsible Wales
6. To build strong and cohesive communities					
<ul style="list-style-type: none"> • Improve social cohesion and equality opportunities • Reduce gender/age/disability/gender/race/religion inequalities • Ensure children who have any kind of disability can lead full and independent lives • Ensure children can live to a standard that is good enough to meet their physical and mental needs • Ensure children can develop healthily, and have access to good quality health care, clean water, nutritious food and a clean environment 	<ul style="list-style-type: none"> • The number of reports of hate crime by protected characteristic. • Percentage of people who feel that their local area is a place where people from different backgrounds can get on well together. • Percentage of people who report that they feel they belong to their neighbourhood. 	<ul style="list-style-type: none"> • Reduce health inequalities. • Reduced unequal outcomes in education to maximise individual potential. • Reduce inequalities in employment. • Reduce inequalities in personal safety. • Reduce inequalities in access to information and services, buildings and the environment. • Increase the percentage of people who feel that their local area is a place where people from different backgrounds can get on well together. • Increase the percentage of people who report that they feel they belong to their neighbourhood. 	Community Cohesion Strategy for Wales TAN 2	Equalities Health	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language
7. To promote a sustainable economy, business development and investment					
<ul style="list-style-type: none"> • To encourage economic growth • To diversify the economy and encourage new business formation and inward investment • To encourage and promote sustainable tourism within the County. 	<ul style="list-style-type: none"> • Gross Value Added per head. • Value Added Tax. • Economic activity rate. 	<ul style="list-style-type: none"> • To increase economic activity rate. • To increase new business start-ups. 	Flintshire Regeneration Strategy 2009-2020		A prosperous Wales A resilient Wales A more equal Wales
8. To provide employment opportunities across the County and promote economic inclusion					
<ul style="list-style-type: none"> • To increase local employment opportunities across the County • To improve access to jobs • Maximise traineeship and apprenticeship opportunities • To reduce levels of child and fuel poverty within the County 	<ul style="list-style-type: none"> • Number of LSOAs in bottom 10% employment deprived. • Percentage working unemployed. • Employment in different sectors. • Employment in different occupation groups. • Number of LSOAs in bottom 10% for income deprivation. 	<ul style="list-style-type: none"> • To reduce number of wards with LSOAs in the bottom 10% for employment deprivation. • To reduce number of wards with LSOAs in the bottom 10% for income deprivation. • Increase number of Flintshire residents assisted by Flintshire County Council to maximise their income. 	Flintshire Regeneration Strategy 2009-2020 Flintshire Improvement Plan 2014-2015	Equalities	A prosperous Wales A resilient Wales A more equal Wales

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
		<ul style="list-style-type: none"> • Increase the number of Council homes receiving energy efficiency measures. • Increase small – medium sized enterprise (SME) employment. • Increase the number of individuals receiving support to access employment, 			A Wales of cohesive communities
9. To maintain and improve the quality of life in rural areas					
<ul style="list-style-type: none"> • To support rural diversification • To encourage ICT / broadband links in rural areas 	<ul style="list-style-type: none"> • Number of diversification schemes. • Number of farmers markets. 	<ul style="list-style-type: none"> • Increase the number of people benefitting from new rural services to support. • Support schemes that will raise the standard of living and quality of life in rural communities 	Flintshire Regeneration Strategy 2009-2020		A more resilient Wales A more equal Wales A prosperous Wales A Wales of cohesive communities
10. To protect and enhance biodiversity and geodiversity					
<ul style="list-style-type: none"> • To protect and enhance designated sites of nature conservation importance • To protect the integrity of European, proposed European and listed Ramsar sites, or where not at a favourable conservation status, enhance their interest features • To protect and enhance wildlife especially rare and endangered species • To protect and enhance habitats and wildlife corridors • To conserve, enhance and create appropriate wildlife habitats and wider biodiversity in urban and rural areas • To avoid damage or fragmentation of designated sites, habitats and protected species and encourage their enhancement and connection • To provide opportunities for people to access wildlife and open green spaces 	<ul style="list-style-type: none"> • Number and distribution of designated sites including SACs, SPAs, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR). • Condition of SSSIs. • Areas of woodland, including ancient woodland. • Key Biodiversity Action Plan (BAP) species and habitats present within the County. • Number of development schemes which design in urban biodiversity areas. • Number of habitats created and maintained in urban and rural areas. 	<ul style="list-style-type: none"> • No net loss in the number of sites, extent and current features of interest. • There are a number of targets specific to each habitat and species action plan - although these may be too detailed for the LDP. • No net loss in the area or number of sites of ancient woodland. • To enhance the value of Flintshire green spaces as wildlife habitats. • To improve the connectivity between green spaces as a network of green corridors accessible to both people and wildlife. • Creation of green link harnessing the Town's existing open/green space and Waterfront. • Where appropriate provide additional habitats such as wetland/ponds or scrub to increase interest and biodiversity value on greenspace. 	Flintshire County Council NRW A Greenspace Framework Strategy for Flintshire 2013 Flintshire County Council Open Space Survey 2007 Flint Strategy and Masterplan to 2021 Buckley Town Action Plan 2009-2012 Flintshire Coastal Park Green Infrastructure Action Plan 2011	HRA	A resilient Wales A healthier Wales A globally responsible Wales A Wales of cohesive communities A prosperous Wales

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

Sub-Objectives	Indicators	Targets	Source	Links to other IIA Strands	Relevance to Well-Being Goals
14. To reduce the risk of flooding					
<ul style="list-style-type: none"> To encourage the inclusion of flood mitigation measures such as sustainable urban drainage systems To reduce and manage flooding 	<ul style="list-style-type: none"> Flood risk. Distribution of areas at risk of coastal and fluvial flooding. Number of registered applications for development in flood risk areas. Percentage of development with SuDS. Households registered for flood warnings as a percentage of total number of households at risk of flooding. Number of applications permitted contrary to NRW advice on flooding. 	<ul style="list-style-type: none"> Take a sustainable approach to flood risk management. Reduce the consequences for individuals, communities, businesses and the environment from flooding and coastal erosion. Raise awareness of and engage people in the response to flood and coastal erosion risk. No new development on land at risk of flooding for lifetime of development. 	Flintshire Local Flood Risk Management Strategy 2013 NRW Welsh Government	Health	A resilient Wales A healthier Wales A globally responsible Wales
15. To protect and improve air quality and limit greenhouse gas emissions					
<ul style="list-style-type: none"> To protect and improve local air quality To reduce greenhouse gas emissions including in both existing and new development To reduce CO₂ emissions from the transport sector To encourage all new development to be climate change resilient To reduce negative effects of power generation, heavy industries and transport on local air quality To encourage cleaner technology for power regeneration, heavy industry and transport 	<ul style="list-style-type: none"> Air quality mean concentrations for PM₁₀ and NO₂. Total CO₂ emissions. Percentage of electricity produced/used in Flintshire generated from renewable sources. Proportion of alternative fuelled vehicles. 	<ul style="list-style-type: none"> No AQMAs currently designated or to be designated in the County. Reduce levels of pollution from transport. Achievement of UK Air Quality Strategy objectives for specific pollutants. 	UK Air Quality Strategy	Health	A resilient Wales A healthier Wales A globally responsible Wales
16. To increase energy efficiency, require the use of renewable energy and sustainable building design					
<ul style="list-style-type: none"> To reduce the demand for energy and increase energy efficiency To encourage sustainable building design To increase the use of renewable energy To increase the use of renewable energy To increase energy efficiency 	<ul style="list-style-type: none"> Annual average domestic gas and electricity consumption per consumer. Number of renewable energy projects permitted in the County. 	<ul style="list-style-type: none"> Increase the percentage of new buildings achieving high energy conservation ratings above current baseline. Increase number of new developments with sustainable building design. Achieve measurable change that enhances the environment or improves sustainability. 	Flintshire Regeneration Strategy 2009-2020	Health	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities

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

2.3 Developing and refining alternatives and assessing effects and preparing the IIA Report

2.3.1 This section sets out information chronologically for how alternatives were developed and refined, effects were assessed and the associated IIA reporting. For further information regarding Reasonable Alternatives see Chapter 4.

Vision and Strategic Objectives

2.3.2 Within the Preferred Strategy LDP (2017) document the Council proposed a Vision for Flintshire by 2030, which was proposed in the Deposit LDP (September 2019). This Vision was assessed in the Deposit IIA Report for its compatibility to the IIA Objectives. The Vision and Objectives of the LDP was amended through the Matters Arising Changes. The updated Vision is set out in Box 1.

Box 1: The updated Vision following the MACs

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

2.3.3 The Council also proposed 19 Strategic Objectives in the Preferred Strategy LDP (2017) document, which are now proposed in the Deposit LDP (September 2019), designed to help ensure the Vision is achieved. The LDP's Strategic Objectives are clear statements of intent that focus in on how the LDP Vision will be delivered. Like the Vision, they take the key challenges facing the County and align them with the three themes of sustainable development:

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

2.3.4 The process of reducing internal conflicts between the LDP Objectives has been aided through the IIA compatibility assessment. The outcome of this assessment was used to refine the Objectives and reduce the areas of potential conflict.

2.3.5 As part of the Matters Arising Changes, Strategic Objectives 10, 11 and 13 have been amended.

2.3.6 The Vision and Strategic Objectives were assessed for their compatibility with the IIA Objectives, and scored positively or neutrally. The compatibility scores have not altered when taking into consideration the Matters Arising Changes. The changes have enhanced the compatibility, but not altered individual scores.

Growth and Spatial Options

2.3.7 In 2016, the Council prepared the Strategic Options LDP document. This included six growth options and five spatial options (referred to as strategic options). Further information regarding Reasonable Alternatives is presented in Chapter 4.

2.3.8 Each Strategic Option was assessed for its likely sustainability effects in the SA of Strategic Options SA Report (October 2016). The assessment was undertaken using a simple matrix-based approach,

in Autumn 2016. The recommendations provided contributed to their refinement and definition of the Preferred Strategy.

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

Policies

- 2.3.11 In addition to establishing the Council's preferred options for growth and spatial distribution, as well as the Vision and Strategic Objectives, the Preferred Strategy LDP (2017) established 16 Strategic Policies for the LDP.
- 2.3.12 Each strategic policy was assessed in the IIAA Report accompanying the Preferred Strategy LDP (2017) pre-deposit consultation. The only change to the Strategic Policies between the 2017 consultation and the Deposit consultation was the increase in the overall housing requirement of around 300 homes. The scores recorded for each Strategic Policy against each IIA Objective are presented in Table 2-6. Policy STR3 is comprised of two strategic site allocations and is therefore included in the sites assessments discussion.
- 2.3.13 In order to achieve the 19 Strategic Objectives, the LDP sets out Strategic and Development Management Policies (see Table 2-2). These are divided across the following themes:
- Creating sustainable places and communities;
 - Supporting a prosperous economy;
 - Meeting housing needs; and
 - Valuing the environment.

Table 2-2: Policies set out in the LDP (those in bold are new policies and in red were amended through the Matters Arising Changes and assessed in the IIA Addendum)

Policies in September 2019 LDP	Policies following Matters Arising Changes 2021
Strategic Policies	
Creating Sustainable Places and Communities	
Policy STR1: Strategic Growth	Policy STR1: Strategic Growth
Policy STR2: The Location of Development	Policy STR2: The Location of Development
Policy STR3: Strategic Sites	Policy STR3A: Strategic Site - Northern Gateway
	Policy STR3B: Strategic Site - Warren Hall
Policy STR4: Principles of Sustainable Development, Design and Placemaking	Policy STR4: Principles of Sustainable Development, Design and Placemaking
Policy STR5: Transport and Accessibility	Policy STR5: Transport and Accessibility
Policy STR6: Services, Facilities and Infrastructure	Policy STR6: Services, Facilities and Infrastructure
Supporting a Prosperous Economy	

Policies in September 2019 LDP	Policies following Matters Arising Changes 2021
Policy STR7: Economic Development, Enterprise and Employment	Policy STR7: Economic Development, Enterprise and Employment
Policy STR8: Employment Land Provision	Policy STR8: Employment Land Provision
Policy STR9: Retail Centres and Development	Policy STR9: Retail Centres and Development
Policy STR10: Tourism, Culture, and Leisure	Policy STR10: Tourism, Culture, and Leisure
Meeting Housing Needs	
Policy STR11: Provision of Sustainable Housing Sites	Policy STR11: Provision of Sustainable Housing Sites
Policy STR12: Provision for Gypsies and Travellers	Policy STR12: Provision for Gypsies and Travellers
Valuing the Environment	
Policy STR13: Natural and Built Environment, Green Networks and Infrastructure	Policy STR13: Natural and Built Environment, Green Networks and Infrastructure
Policy STR14: Climate Change and Environmental Protection	Policy STR14: Climate Change and Environmental Protection
Policy STR15: Waste Management	Policy STR15: Waste Management
Policy STR16: Strategic Planning for Minerals	Policy STR16: Strategic Planning for Minerals
Development Management Policies	
Creating Sustainable Places and Communities	
Policy PC1: The Relationship of Development to Settlement Boundaries	Policy PC1: The Relationship of Development to Settlement Boundaries
Policy PC2: General Requirements for Development	Policy PC2: General Requirements for Development
Policy PC3: Design	Policy PC3: Design
Policy PC4: Sustainability and Resilience of New Development	Policy PC4: Sustainability and Resilience of New Development
Policy PC5: Transport and Accessibility	Policy PC5: Transport and Accessibility
Policy PC6: Active Travel	Policy PC6: Active Travel
Policy PC7: Passenger Transport	Policy PC7: Passenger Transport
Policy PC8: Airport Safeguarding Zone	Policy PC8: Airport Safeguarding Zone
Policy PC9: Protection of Disused Railway Lines	Policy PC9: Protection of Disused Railway Lines
Policy PC10: New Transport Schemes	Policy PC10: New Transport Schemes
Policy PC11: Mostyn Docks	Policy PC11: Mostyn Docks
Policy PC12: Community Facilities	Policy PC12: Community Facilities
Supporting a Prosperous Economy	
Policy PE1: General Employment Land Allocations	Policy PE1: General Employment Land Allocations
Policy PE2: Principal Employment Areas	Policy PE2: Principal Employment Areas
Policy PE3: Employment Development Outside Allocated Sites and Principal Employment Areas	Policy PE3: Employment Development Outside Allocated Sites and Principal Employment Areas
Policy PE4: Farm Diversification	Policy PE4: Farm Diversification
Policy PE5: Expansion of Existing Employment Uses	Policy PE5: Expansion of Existing Employment Uses
Policy PE6: Protection of Employment Land	Policy PE6: Protection of Employment Land
Policy PE7: Retail Hierarchy	Policy PE7: Retail Hierarchy
Policy PE8: Development within Primary Shopping Areas	Policy PE8: Development within Primary Shopping Areas
Policy PE9: Development outside Primary Shopping Areas	Policy PE9: Development outside Primary Shopping Areas
Policy PE10: District and Local Centres	Policy PE10: District and Local Centres and Local Convenience Shops
Policy PE11: Edge and Out of Town Retail Development	Policy PE11: Edge and Out of Town Retail Development
Policy PE12: Tourist Accommodation, Facilities and Attractions	Policy PE12: Tourist Accommodation, Facilities and Attractions
Policy PE13: Caravan Development in the Open Countryside	Policy PE13: Caravan Development in the Open Countryside
Policy PE14: Greenfield Valley	Policy PE14: Greenfield Valley
	Policy PE15: Telecommunications and Digital Technology Infrastructure

Policies in September 2019 LDP	Policies following Matters Arising Changes 2021
Meeting Housing Needs	
Policy HN1: New Housing Development Proposals	Policy HN1: New Housing Development Proposals
Policy HN2: Density and Mix of Development	Policy HN2: Density and Mix of Development
Policy HN3: Affordable Housing	Policy HN3: Affordable Housing
Policy HN4: Housing in the Countryside	Policy HN4: Housing in the Countryside
Policy HN4-A: Replacement Dwellings	Policy HN4-A: Replacement Dwellings
Policy HN4-B: Residential Conversion of Rural Buildings	Policy HN4-B: Residential Conversion of Rural Buildings
Policy HN4-C: Infill Development in Groups of Houses	Policy HN4-C: Infill Development in Groups of Houses
Policy HN4-D: Affordable Housing Exceptions Schemes	Policy HN4-D: Affordable Housing Exceptions Schemes
Policy HN5: House Extensions and Alterations	Policy HN5: House Extensions and Alterations
Policy HN6: Annex Accommodation	Policy HN6: Annex Accommodation
Policy HN7: Houses in Multiple Occupation	Policy HN7: Houses in Multiple Occupation
Policy HN8: Gypsy and Traveller Sites	Policy HN8: Gypsy and Traveller Sites
Policy HN9: Gypsy and Traveller Accommodation	Policy HN9: Gypsy and Traveller Accommodation
Valuing the Environment	
Policy EN1: Sports, Recreation and Cultural Facilities	Policy EN1: Sports, Recreation and Cultural Facilities
Policy EN2: Green Infrastructure	Policy EN2: Green Infrastructure
Policy EN3: Undeveloped Coast and Dee Estuary Corridor	Policy EN3: Undeveloped Coast and Dee Estuary Corridor
Policy EN4: Landscape Character	Policy EN4: Landscape Character
Policy EN5: Area of Outstanding Natural Beauty	Policy EN5: Area of Outstanding Natural Beauty
Policy EN6: Sites of Biodiversity Importance	Policy EN6: Sites of Biodiversity and Geodiversity Importance
Policy EN7: Development Affecting Trees, Woodland and Hedgerows	Policy EN7: Development Affecting Trees, Woodland and Hedgerows
Policy EN8: Built Historic Environment and Listed Buildings	Policy EN8: Built Historic Environment and Listed Buildings
Policy EN9: Development in or Adjacent to Conservation Areas	Policy EN9: Development in or Adjacent to Conservation Areas
Policy EN10: Buildings of Local Interest	Policy EN10: Buildings of Local Interest
Policy EN11: Green Barriers	Policy EN11: Green Wedges
Policy EN12: New Development and Renewable and Low Carbon Energy Technology	Policy EN12: New Development and Renewable and Low Carbon Energy Technology
Policy EN13: Renewable and Low Carbon Energy Development	Policy EN13: Renewable and Low Carbon Energy Development
Policy EN14: Flood Risk	Policy EN14: Flood Risk
Policy EN15: Water Resources	Policy EN15: Water Resources
Policy EN16: Development on or near Landfill Sites or Derelict and Contaminated Land	Policy EN16: Development on or near Landfill Sites or Derelict and Contaminated Land
Policy EN17: Development of Unstable Land	Policy EN17: Development of Unstable Land
Policy EN18: Pollution and Nuisance	Policy EN18: Pollution and Nuisance
Policy EN19: Managing Waste Sustainably	Policy EN19: Managing Waste Sustainably
Policy EN20: Landfill Buffer Zone	Policy EN20: Landfill Buffer Zone
Policy EN21: Locations for Waste Management Facilities	Policy EN21: Locations for Waste Management Facilities
Policy EN22: Criteria for Waste Management Facilities and Operations	Policy EN22: Criteria for Waste Management Facilities and Operations
Policy EN23: Minerals Safeguarding	Policy EN23: Minerals Safeguarding
Policy EN24: Minerals Buffer Zones	Policy EN24: Minerals Buffer Zones
Policy EN25: Sustainable Minerals Development	Policy EN25: Sustainable Minerals Development
Policy EN26: Criteria for Minerals Development	Policy EN26: Criteria for Minerals Development
Policy EN27: Secondary and Recycled Aggregate	Policy EN27: Secondary and Recycled Aggregate

Strategic Policies

2.3.14 The six policies under the banner of Creating Sustainable Places and Communities seek to set the scene and provide clear direction as to how Flintshire will be developed over the Plan period. The policies seek to ensure that employment is the main driving factor for Flintshire's continued growth which will, in turn, encourage inward investment and bring about improvements in Flintshire's services and infrastructure. Through the Matters Arising Changes, Policies STR1 and STR2 were amended. Policy STR1 was amended to reflect the removal of housing and employment land within allocations. These changes did not result in a change the previously identified IIA scores. Minor changes were made to STR2 which did not alter the IIA scores predicted.

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

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

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

2.3.18 The IIA scores for the final Strategic policies are set out in Table 2-3 below.

Table 2-3: Scores recorded for each Strategic Policy against each IIA Objective

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

Strategic Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
Valuing the Environment																		
STR13	○	○	+	○	+	+	+	○	?	++	++	++	+	++	+	○	+	+
STR14	○	○	+	○	○	○	+/-	○	○	+	+	○	++	++	++	++	++	○
STR15	○	○	○	○	○	○	+	+	○	+	+	-	+	○	+	+	+	○
STR16	○	○	○	+/-	○	○	+	+	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	○

Development Management Policies

- 2.3.19 ‘Creating Sustainable Places and Communities’ DM policies were consistently predicted to make positive contributions towards most IIA Objectives with a range of significant positive effects predicted. Overall, these policies would be likely to help ensure that new development in Flintshire is of a scale, type and location that is relatively sustainable and that contributes towards the formation of high-quality and resilience places. In particular, these policies would be likely to make a major contribution towards reducing crime and the fear of crime; improving the health and wellbeing of local people; protecting and enhancing biodiversity and landscapes and reducing the County’s carbon footprint and GHG emissions.
- 2.3.20 The ‘Prosperous Economy’ DM policies would be expected to help ensure that new development in Flintshire over the Plan period is of a scale, type and location that ensures local and county-wide employment needs are met whilst the County’s economy can grow, diversify and play an important role in the regional economy.
- 2.3.21 All housing policies would help to ensure that over the Plan period the varied needs of Flintshire’s growing population can be satisfied. These policies would be expected to make a major contribution towards ensuring new and existing people in Flintshire can live in safe and high-quality homes that are of a scale, location and type that is appropriate to local needs, enables relatively sustainable living and contributes towards cohesive communities.
- 2.3.22 The ‘Valuing the Environment’ policies were consistently predicted to result in positive effects on IIA Objectives, regularly evaluated as being significantly positive, with no negative effects predicted. It is highly likely that these policies would help to ensure that new development in Flintshire is designed, managed, constructed, laid out, located and scaled in a way that helps to minimise risks to the natural environment whilst maximising opportunities for enhancing the environment.
- 2.3.23 Policies PC3, PC4, PC5, PE2, PE10, PE13, PE14, PE15, HN7, HN9, EN6, EN13, EN15, and EN23 were amended through the Matters Arising Changes. The amendments to the policies have primarily lead to positive improvements in relation to the IIA Objectives, even if the IIA Objective score did result in an improvement to the previously identified IIA score. Overall, the Matters Arising Changes have resulted in greater benefits, even though the overall cumulative effects have not altered.
- 2.3.24 The IIA scores for the final DM policies are presented in Table 2-4 below.

Table 2-4: Scores recorded for each Development Management Policy against each IIA Objective

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
Creating Sustainable Places and Communities DM Policies																		
PC1	0	0	0	0	+	0	0	+	0	+	+	0	0	0	+	0	+	0
PC2	++	0	+	+	+	+	+	+	0	+	+	+	+	+	++	0	0	0
PC3	++	0	++	+	+	0	0	0	0	++	++	++	0	+	0	0	0	0
PC4	+	0	+	+	0	0	0	0	0	++	++	+	+	++	+	++	+	0
PC5	+	0	+	0	++	+	+	+	0	0	0	0	0	0	++	0	0	0
PC6	+	+	+	0	+	+	+	+	0	0	0	0	0	0	++	0	0	0
PC7	0	+	0	0	+	+	+	+	0	0	0	0	0	0	++	0	0	0
PC8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PC9	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
PC10	0	0	0	0	+	0	+	+	+	-	-	0	0	0	+/-	0	0	0
PC11	0	+	0	0	+	+	++	++	0	+	+	0	+	0	+	0	0	0
PC12	0	++	+	0	+	++	0	+	+	0	0	0	0	0	0	0	0	0
Supporting a Prosperous Economy DM Policies																		
PE2	++	+	+	+	+	++	++	+	0	+	+	+	0	+	+	0	+	+
PE3	++	+	+	+	+	++	++	+	0	+	+	+	0	0	+	0	+	+
PE4	+	+	0	0	0	0	++	++	+	0	+	+	0	0	0	0	0	+
PE5	+	+	+	+	0	++	++	++	0	+	+	+	0	0	+	0	+	+
PE6	+	+	0	0	0	0	++	++	0	0	0	0	0	0	0	0	0	+
PE7	+	+	+	0	+/-	+	++	++	0	+	+	0	0	0	+	0	+	+
PE8	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
PE9	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
PE10	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
PE11	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
PE12	+	+	0	0	+	0	++	++	+	+	+	+	0	0	0	0	-	+
PE13	+	+	0	0	+	0	++	++	+	+	+	+	0	0	0	0	-	+
PE14	+	+	0	0	+	0	++	++	+	+	+	+	0	0	0	0	-	+
PE15	+	+	+	0	+	+	+	+	+	+	+	+	0	0	0	+	0	+
Meeting Housing Needs DM Policies																		
HN2	++	0	0	++	0	+	0	0	0	++	+	0	0	0	0	0	+	+
HN3	++	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	+
HN4	++	0	0	++	0	+	+	+	++	+/-	+	0	-	0	0	0	0	+
HN4-A	+	0	0	+	0	+	0	0	0	0	++	++	0	0	0	0	0	+
HN4-B	+	0	0	+	0	+	+	+	+	0	++	++	0	0	0	0	0	+
HN4-C	+	0	0	+	+	+	0	0	0	+/-	++	++	0	0	0	0	0	+
HN4-D	+	0	0	+	0	0	0	0	0	-	+	0	0	0	0	0	-	+
HN5	+	0	0	+	0	0	0	0	0	0	+	+	0	0	0	0	0	+
HN6	+	0	0	+	0	0	0	0	0	0	+	+	0	0	0	0	0	+
HN7	++	0	+	++	++	+	0	0	0	0	+	0	0	0	+	0	0	+
HN9	+	0	0	++	++	+	0	++	0	-	-	0	0	+	0	0	+	+
Valuing the Environment DM Policies																		
EN1	+	0	++	0	++	++	0	0	0	++	++	0	0	0	0	0	0	0
EN2	0	0	++	0	++	+	0	0	0	++	++	0	+	+	++	0	0	0
EN3	0	0	+	0	+	0	+	0	0	++	++	0	0	+	0	0	0	0
EN4	0	0	+	0	0	0	0	0	0	++	++	+	0	0	0	0	0	0
EN5	0	0	+	+	+	0	+	+	+	++	++	++	0	0	0	0	0	0

Policy	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
EN6	0	0	+	0	+	0	0	0	0	++	+	++	0	0	0	0	0	0
EN7	0	0	+	0	0	0	0	0	0	++	++	0	0	+	+	0	0	0
EN8	0	0	0	0	+	0	0	0	0	0	++	++	0	0	0	0	0	0
EN9	0	0	0	0	+	0	0	0	0	0	++	++	0	0	0	0	0	0
EN10	0	0	0	0	+	0	0	0	0	0	++	++	0	0	0	0	0	0
EN11	0	0	+	+	0	0	0	0	+	++	++	0	0	0	0	0	+	0
EN12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	0	0
EN13	0	0	0	0	+	0	0	0	0	0	+	0	0	0	++	++	0	0
EN14	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0
EN15	0	0	0	0	0	0	0	0	0	++	0	0	++	0	0	0	+	0
EN16	0	0	0	+	0	0	0	0	0	+	+	+	0	0	0	0	++	0
EN17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0
EN18	+	0	+	+	0	+	0	0	0	++	+	0	0	0	+	0	0	0
EN19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
EN20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EN21	0	0	0	0	0	+	+	+	0	+	+	+	0	0	0	0	0	0
EN22	0	0	0	+	0	+	+	+	0	0	+	+	0	0	0	0	+	0
EN23	0	0	0	+	0	+	+	+	0	0	0	0	0	0	0	0	+	0
EN24	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	+	0
EN26	0	0	-	+	0	+	+	+	0	+	+	+	0	0	0	0	+	0
EN27	0	0	0	+	0	+	+	+	0	0	+	0	0	0	+	0	+	0

Site Allocations

2.3.25 The LDP proposes a range of sites in Flintshire to be allocated for various types of development in order to ensure that the County's development needs over the Plan period can be satisfied. The sustainability of each location has also been a key consideration for the Council when allocating sites for development. Table 2-5 sets out the range of sites allocated in the LDP, including the policies under which they are allocated.

Table 2-5: Site allocations proposed in the Deposit LDP and reasonable alternatives

LDP Policy / site ref.	Location	Proposed/potential development
Allocated sites		
PC12.1	Community Centre, Woodlane	Community Facilities
PC12.2	Greenfield Cemetery	Community Facilities
PC12.3	Treuddyn Cemetery	Community Facilities
H1.1	Well Street	Housing
H1.2	Broad Oak holding, Mold Road	Housing
H1.3	Highmere Drive, Connah's Quay	Housing
H1.4	Northop Road	Housing
H1.5	Maes Gwern	Housing
H1.6	Land between Denbigh Road and Gwernaffield Road	Housing
H1.7	Holywell Road / Green Lane	Housing
H1.8	Ash Lane	Housing
H1.9	Wrexham Road	Housing
H1.10	Cae Isa, A5119	Housing
H1.11	Chester Road	Housing
HN8.1	Magazine Lane	Gypsy and Traveller Sites
HN8.2	Gwern Lane	Gypsy and Traveller Sites

LDP Policy / site ref.	Location	Proposed/potential development
HN8.3	Riverside Park	Gypsy and Traveller Sites
HN8.4	Castle Park	Gypsy and Traveller Sites
EN25.1	Hendre Quarry	Minerals Development
EN25.2	Pant y Pwll Dwr Quarry	Minerals Development
EN25.3	Ddol Uchaf Quarry	Minerals Development
EN25.4	Fron Haul Quarry	Minerals Development
PE1.1	Manor Lane, Chester Aerospace Park	Employment
PE1.2	Manor Lane, Hawarden Park Extension	Employment
PE1.3	Drury New Road	Employment
PE1.4	Greenfield Business Park Phase II	Employment
PE1.5	Greenfield Business Park Phase III	Employment
PE1.6	Broncoed Industrial Estate	Employment
PE1.7	Mold Business Park	Employment
PE1.8	Adjacent Mostyn Docks	Employment
PE1.9	Chester Road East	Employment
PE1.10	Antelope Industrial Estate	Employment
PE1.11	River Lane	Employment
PE1.12	Rowley's Drive	Employment
STR3A	Northern Gateway Mixed Use Development Site	Mixed use strategic site
STR3B	Warren Hall Mixed Use Development Site	Mixed use strategic site
EN13.1	Crump's Yard, Dock Road	Solar Farms
EN13.2	Castle Park	Solar Farms

2.3.26 The assessments of housing site allocations identified a range of effects. Many of the residential site boundaries include land at risk of flooding and minor negative effects on most natural environment objectives couldn't be ruled out. The allocation of these sites would help to ensure that the varied housing needs of Flintshire's growing population over the Plan period could be satisfied. The location of the housing sites generally could help to ensure that new residents would have good or excellent access to key services, amenities and spaces including schools, health centres, employment areas, community centres, retail areas and recreational opportunities.

2.3.27 The employment site allocations in the LDP are generally in highly accessible locations and would be expected to make a major contribution towards ensuring that employment needs in the County over the Plan period can be satisfied. Many of the employment sites are within high flood risk areas and careful siting of development could be required to ensure new development avoids flood risk with which it is incompatible. The loss of open spaces to new employment development could pose a risk to the local biodiversity and character. Through the Matters Arising Changes, six employment sites have been removed from Policy PE1:

- PE1.4 Greenfield Business Park Phase II
- PE1.5 Greenfield Business Park Phase III
- PE1.6 Broncoed Industrial Estate
- PE1.8 Adjacent Mostyn Docks
- PE1.10 Antelope Industrial Estate
- PE1.12 Rowley's Drive

2.3.28 The LDP allocates to strategic sites for mixed-use development through Policy STR3. Both sites would make a significant contribution towards satisfying Flintshire's growing and varied housing and employment needs and could make a major boost to the local economy. Given the size of these sites, and that a large portion of both sites is greenfield, there is a risk of negative effects on natural environment objectives, but particularly natural resources given the likely significant losses of ecologically and agriculturally important soils. These site allocations were both amended through the Matters Arising Changes, but the alternations led to positive changes to the sustainability performance

in relation to environmental IIA Objectives. The proposed use at STR3B was amended through the Matters Arising Changes, with the previously proposed 300 homes removed from the allocation, and therefore, the site no longer scored positively in relation to housing.

- 2.3.29 Given the nature of community facilities (PC12.1 – PC12.3), effects on most IIA Objectives are expected to be neutral or negligible. The provision of these facilities, which are generally in accessible locations, would be likely to deliver benefits to the local community and could help to reduce the risk of crime or anti-social behaviour.
- 2.3.30 The Gypsy and Traveller site allocations in the LDP would help to ensure that the needs of the gypsy, traveller and travelling showpeople community in Flintshire are satisfied over the Plan period. These sites are generally in highly accessible locations and would provide site users with good access to key services amenities and facilities. Through the Matters Arising Changes, amendments were made to site HN8-1, to increase the number of pitches from 8 to 9, and HN8-2, to decrease the number of pitches from 8 to 4. These changes did not result in changes to the identified IIA scores.
- 2.3.31 Policy EN25 allocates four mineral sites for extensions to the mineral development. Expansions of the mineral development could provide a major boost to employment opportunities in this industry and could help to deliver major economic gains to Flintshire.
- 2.3.32 The two solar farm allocations under Policy EN13 were removed from the LDP, as they have been constructed.
- 2.3.33 No new sites have been proposed through the Matters Arising Changes process and all sites allocated in the LDP have been assessed in previous IIA reports.
- 2.3.34 The scores for all of the final allocated sites are set out in Table 2-6.

Table 2-6: Scores recorded for each allocated site against each IIA Objective

Policy / Site ref.	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
H1.1	O	+	+	++	+	++	O	++	O	-	-	-	-	-	-	-	-	+
H1.2	-	+	+	+	+	++	O	++	O	-	-	O	-	O	-	-	-	+
H1.3	-	++	+	++	-	++	O	++	O	-	-	O	O	O	-	-	-	+
H1.4	O	++	+	++	-	++	O	++	O	-	-	-	-	-	-	-	-	+
H1.5	O	++	++	++	++	++	O	++	O	-	-	-	-	O	-	-	-	++
H1.6	-	+	+	++	+	-	O	++	O	-	-	-	-	O	-	-	-	++
H1.7	O	+/-	-	++	-	++	O	++	O	-	-	O	-	-	-	-	-	+
H1.8	O	+/-	++	++	+	-	O	+	O	-	-	-	-	-	-	-	-	+
H1.9	O	++	+	+	++	-	O	+	O	-	-	-	-	-	-	-	-	+
H1.10	O	+	++	++	++	-	O	+	O	-	-	-	-	-	-	-	-	+
H1.11	O	++	+	++	-	++	O	+	O	-	-	O	-	O	-	-	-	+
PE1.1	+	+	O	O	-	+	++	++	O	-	-	O	-	-	-	-	-	O
PE1.2	+	+	O	O	-	+	++	++	O	-	-	O	-	-	-	-	-	O
PE1.3	+	+	O	O	++	+	++	++	O	-	-	O	-	-	-	-	-	O
PE1.7	+	+	O	O	-	+	++	++	O	-	-	-	-	-	-	-	-	O
PE1.9	+	+	O	O	++	+	++	++	O	-	-	-	-	-	-	-	-	O
PE1.11	+	+	O	O	+	+	++	++	O	-	-	O	-	+	-	-	-	O
STR3A	+/-	++	+	++	++	-	++	++	O	-	-	-	-	+	-	-	-	O
STR3B	+	+	O	O	+	O	++	++	O	-	-	-	-	-	-	-	-	O

Policy / Site ref.	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
PC12.1	+	0	0	0	+	++	0	0	0	-	-	0	0	0	0	0	0	0
PC12.2	+	0	0	0	+	++	0	0	0	-	-	0	0	0	0	0	0	0
PC13.3	+	0	0	0	+	++	0	0	0	-	-	0	0	0	0	0	0	0
HN8-1	0	-	+	+	-	++	0	+	0	-	-	0	-	0	-	-	-	0
HN8-2	0	-	++	+	+	++	0	+	0	-	-	0	-	0	-	-	-	0
HN8-3	0	+	+	+	++	++	0	+	0	-	-	0	-	0	-	-	-	0
HN8-4	0	+	+	+	+	+	0	+	0	-	-	0	-	0	-	-	-	0
EN25-1	0	+	0	+	0	+	++	++	0	0	0	0	-	0	-	-	+	0
EN25-2	0	+	0	+	0	+	++	++	0	0	0	0	-	0	-	-	+	0
EN25-3	0	+	0	+	0	-	++	++	0	-	-	0	-	0	-	-	-	0
EN25-4	0	+	0	+	0	+	++	++	0	0	0	0	-	0	-	-	+	0
EN13-1	0	0	0	0	0	0	+	0	0	-	0	0	0	0	+	++	0	0
EN13-2	0	0	0	0	0	0	+	0	0	-	0	0	0	0	+	++	0	0

Recommendations

2.3.35 A wide range of recommendations were made in the Submission IIA alongside the assessments, as summarised in Table 2-7. The Council have supplied information on how these recommendations have been taken into account in the plan-making process. These recommendations are set out per IIA Objective, and the responses from the Council relate to specific policies in the LDP.

2.3.36 No further recommendations have been suggested following the assessment of the Matters Arising Changes, as the amendments lead to improvements in terms to IIA effects.

Table 2-7: Summary of measures recommended for each IIA Objective in the Submission IIA Report and how these recommendations have been taken into account

IIA Objective	Summary of Recommendations	How has the recommendation been taken into account?
1 Crime	Where development would be situated within areas of relatively high-crime rates, proposals should demonstrate that the design of the development incorporates measures for reducing the risk of crime and minimises opportunities for anti-social behaviour, such as by facilitating high rates of natural surveillance, providing safe and secure storage spaces for bicycles or providing a well-lit public realm.	Policy PC2 contains several criteria which will work towards achieving this through design measures. Policy PC3 requires in criteria f) 'create attractive, accessible and safe and healthy places with natural surveillance, visibility and sensitive lighting'. Para 12.67 of the explanation to policy EN18 recognises that there is balance between lighting in terms of safety and reducing crime and causing light pollution. PPW11 identifies in Figure 8 that 'community safety' is a key part of Good Design and specifies 'Ensuring attractive, safe public spaces / security through natural surveillance'. It is considered that the combined national and local policy context provides the basis for this to be achieved.
2 Education	Where new residential development would place pressure on the capacity of local schools, appropriate class-room capacity should be demonstrated prior to development being approved. Where necessary, contributions from developers	Policy STR6 sets out a clear requirement in criteria ii) for new development to mitigate the impacts on school capacity. This will be achieved through the existing SPG which is to be reviewed and updated following adoption of the Plan.

IIA Objective	Summary of Recommendations	How has the recommendation been taken into account?
	<p>towards the expansion of schools could be considered.</p> <p>All new residential development should enable and encourage walking and cycling and would ideally provide safe and convenient walking and cycling access to primary and secondary schools.</p>	<p>Policy PC2 requires in criteria d. that new developments 'maximise sustainable travel choice by having safe and convenient access by foot, cycle, public transport and vehicles'. Policy PC5 reflects the transport hierarchy in PPW11, and has been further modified by the Inspector, by seeking to reduce reliance on the car by ensure sustainable means of travel. On larger scale housing developments consideration will be given to Safe Routes to Schools. It is not considered that the policies in the Plan need to specifically mention schools</p>
3 Health	<p>New residential development proposals should demonstrate a provision of adequate space, outdoor amenity space and access to communal open-spaces as well as a diverse-range of natural habitats.</p> <p>All new residential development should enable and encourage walking and cycling and would ideally provide safe and convenient walking and cycling access to a nearby GP surgery.</p>	<p>Policy EN1 has been amended as part of the MACs to specify the provision of open space at the standard of 2.4ha per 1000 population. The policy will be supported by SPG. The policy should be read in conjunction with EN2 Green Infrastructure. Policies EN6 and EN7 also seek to bring about biodiversity enhancement or net benefit.</p> <p>Policies PC2, PC4, PC5 and PC6 would all work towards the objective of accessibility on foot or by cycle. However, the geographical location of health facilities across the County is such that not all residential development can be within walking or cycling distance of a GP surgery.</p>
5 Access	<p>Some sites allocated for development run in close proximity to, or adjacent to, the PRoW network. At some sites the PRoW runs through the site perimeter. In such cases, development proposals should demonstrate that the capacity, function and quality of the PRoW is not diminished during the construction or operation phases of the proposed development.</p>	<p>Policies PC2, PC5, PC6 and EN2 work together in seeking to ensure green infrastructure incorporates where appropriate, pedestrian linkages and this could include existing PROW. Where this is considered to be an issue in the subsequent layout and design of a housing allocation, it has been referenced in the brief design guiding e.g. HN1.7.</p>
6 Strong & cohesive communities	<p>New residential development proposals should demonstrate that new residents would have appropriate access to community facilities. The development should provide appropriate levels of outdoor amenity space and communal areas that facilitate interactions and socialisation between members of the community.</p>	<p>The Plans allocations have been located in sustainable settlements which have appropriate provision of community facilities and services. Subsequent windfall proposals will be assessed in the context of policy STR2 which specifies the type and scale of housing development relative to different tiers in the settlement hierarchy.</p> <p>Policy PC3 will ensure the provision of appropriate space about dwellings and private amenity space whilst policy EN1 will ensure appropriate communal open space to enable community cohesion.</p>
8 Employment	<p>All new residential development should enable and encourage walking and cycling that would ideally provide safe and convenient walking and cycling access to key employment areas.</p>	<p>The Plans allocations have been made in sustainable locations which are well located in terms of proximity to employment and Active Travel proposals being pursued by the Council will seek to facilitate journeys to work by foot and cycle. However, it would be unreasonable to require that every single new dwelling in the County could access employment areas on foot or by cycle.</p>
9 Quality of life in rural areas	<p>Where new development takes place in rural locations it should be demonstrated that site-users would have good access to the internet.</p>	<p>Whilst this is a laudable and desired outcome for rural communities it is unclear how this can be positively influenced by the LDP alone. The MAC's have introduced a new policy in respect of telecommunications, and this would be</p>

IIA Objective	Summary of Recommendations	How has the recommendation been taken into account?
		supportive of appropriately sited and design telecommunications development. However, the funding for and timing of improved broadband in rural areas is not a matter within the remit of the Plan.
10 Biodiversity	<p>Many of the new sites allocated for development are greenfield sites that could potentially be of a high biodiversity value or could be supporting priority and protected species and habitats. Appropriate ecological surveys should be conducted prior to development starting and, where appropriate, appropriate measures taken to ensure protected species are not adversely impacted.</p> <p>At sites containing existing green infrastructure and wildlife elements, such as hedgerows, mature trees or small ponds, including those delineating site perimeters, these should be preserved and protected from negative impacts caused by new development. Where the removal of trees, hedgerow or other habitat is necessary for development to proceed these should be replaced by similar wildlife features of a similar quantity, quality and composition nearby. This is not only to attempt to secure the protection and, preferably, enhancement of the site's biodiversity value but to preserve the connectivity of the wider ecological network and to prevent habitats being cut-off or isolated from the network.</p>	The preparation of the Plan involved Cofnod (North Wales Environmental Information Service) undertaking a mapping exercise of all known biodiversity habitats / species against candidate sites. There is also no objection from NRW to the Plan's allocations. The majority of those allocations have been the subject of ecological surveys. Policies EN6 and EN7 provide the basis with which to assess subsequent development proposals and planning applications will be required to be accompanied by ecological surveys and strategies.
11 Landscape / Townscape	<p>Where sites contain existing green infrastructure elements, such as trees or hedgerow, that make a meaningful contribution to the local character it has been recommended that these are preserved as much as possible and supported by the provision of additional GI elements.</p> <p>Development proposals should demonstrate that, when they are situated within or adjacent to existing communities, they respect the local character and if appropriate adopt vernacular architecture in order to preserve and preferably enhance the local townscape or landscape character.</p>	<p>Policy EN2 seeks to protect, maintain and enhance existing green infrastructure as well as create new green infrastructure, as part of new development proposals. Policy EN7 provides specific guidance in respect of trees, woodlands and hedgerows.</p> <p>Policy PC2 criteria a) seeks to ensure new development has regard to character and local distinctiveness.</p>
12 Heritage	<p>In some cases, site locations are relatively close, such as within 300m, of Scheduled Monuments (e.g. Bryn y Cwm, a large earthwork motte and partially surviving counterscarp bank) and it may therefore be appropriate to ensure that archaeological surveys of the site are completed prior to development taking place.</p> <p>Archaeological surveys could potentially be required to help ensure that below ground archaeology is not harmed as a result of the proposed Development.</p> <p>Design that accords with the existing local townscape and local sense of place, in addition to the incorporation of green infrastructure into Development, would be likely to help ensure that the impacts of new development on greenfield or brownfield sites on the setting as well as the views of and from and on the setting of heritage assets, such as Listed Buildings, are avoided or minimised.</p>	<p>Policy EN8 seeks to protect Scheduled Ancient Monuments and their settings. The HN1.4 Northop Rd Flint allocation can avoid harm to the setting of the SAM through the careful siting of built development in this part of the site.</p> <p>Clwyd Powys Archaeological Trust have been involved throughout the preparation of the plan and archaeological features can be addressed as part of the formulation of detailed development proposals and at the development management stage.</p>

IIA Objective	Summary of Recommendations	How has the recommendation been taken into account?
13 Water resources	Careful consideration should be given to the potential impacts of the proposed Development on the quality of the nearby waterbody. Dust or other contaminants entering the waterbody through surface runoff should be prevented and the local water table should remain unaltered by development.	Policy EN15 seeks to protect the water environment from harm and has been added to, to cover the phosphates issue. Policy EN18 also seeks to prevent harm as a result of pollution from new development.
14 Flood risk	<p>Undertake a Flood Consequences Assessment for the Site and consider the need for SuDS in the drainage strategy.</p> <p>The area of land at a High risk of surface water flooding is relatively small and in the south east corner of the Site. It is considered to be likely that with a careful layout of the proposed Development this area of the Site could be avoided.</p> <p>Where GI is within or delineates sites, it should be preserved. New GI provided within developments should seek to be positioned in a way that maximises its flood risk alleviation potential (where flood risk is present).</p>	A Strategic Flood Consequences Assessment has been undertaken to support the Plan and there are no objections from NRW. Policy EN15 sets out guidance in respect of flood risk. At development management stage a further detailed FCA will be required to support development proposals. Policy EN2 provides guidance in respect of green infrastructure.
15 Air quality & GHGs	<p>All new residential development should enable and encourage walking and cycling and would ideally provide safe and convenient walking and cycling access to key services, amenities and facilities.</p> <p>Low-emission vehicles should be encouraged during construction and site-use.</p> <p>New residential development could be encouraged to provide electric car charging infrastructure.</p>	<p>Policies PC2, PC4, PC5 and PC6 will all work together in encouraging walking and cycling, as part of the accessibility of housing sites to local facilities and services.</p> <p>It is unclear how the Plan can stipulate what vehicles and machinery should be used during construction.</p> <p>PPW11 explains that Future Wales sets out the Welsh Governments requirements for the provision of electric vehicle charging points for non-residential development (10% of spaces to have charging points – as built into Policy PC5). However, there is no national policy either in PPW11 or in Future Wales requiring new housing to have charging points as standard. To include this in the policy would be going beyond national policy and introduce concerns from housebuilders about viability.</p>
16 Efficient & renewable energy	<p>It may be appropriate to use a Development Brief some of the larger site allocations.</p> <p>A Design and Access Statement is a Welsh Government requirement for most planning applications in Wales. This would include an explanation of sustainable design, proportionate to the scale and type of development proposed. This should include the likely energy consumption of the proposed Development during construction and operation and to identify and seek out opportunities for improving energy efficiency and employing low and zero carbon technologies.</p>	The MACs have introduced a commitment in policy STR3B to prepare a SPG / development brief in respect of the Warren Hall Strategic Site. STR3A Northern Gateway is proceeding on the basis of the existing framework of planning permissions. Of the 11 allocated housing sites 3 are under construction, 3 have current planning applications and the majority have a preferred developer. Given that each site in policy HN1 has brief guidance, it is not considered necessary that every site has a development brief.
17 Natural resources	Promote the use of recycled/ reused materials in order to decrease the demand on raw materials during construction and provide on-site waste separation facilities wherever possible. Promote sustainable management soils during construction and re-use excavated soils where feasible.	Policy STR15 provides strategic guidance in respect of waste management and reflects the waste hierarchy in PPW11. Policy STR16 also references maximising the use of secondary and recycled aggregates. Policy EN19 requires new development to demonstrate how waste is managed sustainably.

Cumulative Effects

2.3.37 An important element of IIA is the consideration of cumulative effects.

2.3.38 **Cumulative effects** arise, for instance, where several proposals each have insignificant effects but together have a significant effect, or where several individual effects of the proposal have a combined effect: and

2.3.39 **Synergistic effects** interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual effects.

2.3.40 Table 2-8 seeks to predict and evaluate the likely cumulative and synergistic effects of all policies and site allocations in the LDP in-combination.

Table 2-8: Cumulative and synergistic effects of the LDP in-combination

IIA Objective	Overall score	Description of effects
1 Crime	+	Development proposed in the Deposit LDP would be expected to make a major contribution towards reducing rates of homelessness, unemployment, poverty, deprivation and inequality. In so doing, it is likely that it would make a meaningful contribution towards combatting crime in Flintshire. Policies in the LDP seek to ensure that new development is also designed in a way that reduces the risk of crime, such as through high rates of natural surveillance. Much of the proposed development is situated on greenfield land in areas of relatively high crime rates. New development in these locations could potentially have the greatest impact in combatting crime rates, but at the same time could also introduce new targets of crime to the area.
2 Education	++	The LDP would be expected to situate the majority of new residents in locations where they have excellent access to education opportunities. The provision of new employment land would also help to improve opportunities for employment-based skills learning. In some locations it is likely that the capacity of education facilities would be expanded. This is tempered to some extent by a risk of the capacity of some schools being placed under additional pressure due to new development, although in line with LDP policies it is expected that new residential development will only take place when adequate local school capacity has been demonstrated.
3 Health	++	Policies in the LDP would be expected to provide a major contribution towards improving the physical and mental health and wellbeing of local people. The significant provision of homes and jobs would reduce local rates of homelessness, unemployment, poverty, deprivation and inequality with subsequent benefits to people's physical and mental health. Due to the location of site allocations new and existing residents would be expected to have good access to health facilities, including hospitals and GP surgeries recreational, as well as exercise opportunities, social spaces and a diverse range of semi-natural habitats.
4 Housing	++	The LDP would be expected to help ensure that the growing and varied needs of Flintshire's diverse community are catered for over the Plan period.
5 Access	++	Strategic and development management policies would require proposals to demonstrate that site users of new development have good accessibility via walking, cycling and public transport modes. The proposed site allocations are situated in locations which, for the most part, are within a short distance of key services and amenities including community buildings, recreational opportunities, employment areas and retail areas.
6 Communities	++	Strategic and development management policies would be likely to help ensure that the cohesiveness of communities across Flintshire is protected and enhanced. New development is predominantly directed towards areas of existing similar built form, with new residents likely to be living amongst an existing community and employment uses directed towards business or industrial areas. The capacity and quality of existing community facilities are protected whilst three new community facilities have been allocated.
7 Economy	++	The LDP sets out strategic and development management policies that would be expected to help enhance the sustainability and diversity of Flintshire's economy by providing support and encouragement for particular types of businesses that are key to local economic growth. New employment sites allocated for certain uses, such as B2 office-use, would provide a boost to the local economy. Their location versus the location of new residential allocations helps to ensure that businesses and retail spaces have good access to customers and employees. It is

IIA Objective	Overall score	Description of effects
		likely that improvements to local educational attainment as well as Flintshire's digital infrastructure would also benefit the local economy.
8 Employment	++	The LDP allocates a range of employment sites, whilst also supporting and encouraging new employment development in existing business and industrial locations and would therefore be expected to ensure that local rates of unemployment decreases whilst people are afforded greater access to a broader range of high-quality jobs. Improved educational attainment would also improve the employability of Flintshire's residents.
9 Rural life	++	The distribution of new residential and employment development would be expected to help enhance the vitality of rural communities throughout Flintshire whilst not exceeding the capacity of these places to accommodate new development.
10 Biodiversity	-	Development management and strategic policies seek to ensure that biodiversity in Flintshire is protected and enhanced, including the wildlife found across the county and its overall ecological connectivity. It is expected that in many cases new development would avoid negative effects on biodiversity as a result of these policies. Where development has been proposed on brownfield sites there is the potential for development to realise a local net gain in biodiversity. However, the majority of new site allocations would result in the loss of significant quantities of greenfield land and would be likely to result in a loss of sensitive habitats or supporting habitats in some locations. In some areas of Flintshire it is likely that ecological connectivity would be diminished and there is a risk of habitats becoming cut off and isolated from the network.
11 Landscape	-	Strategic and development management policies seek to ensure that new development in Flintshire is of a high-quality and visually attractive design that respects the local character and is in-keeping with the local form. In some cases, new development is potentially an opportunity to enhance the local character. However, the majority of new development would be on greenfield sites that results in the loss of open spaces and GI elements that play an important role in defining the local character. Whilst the development would be of a high-quality design, alternations and potentially negative impacts on the landscape character in rural settlements or edge of settlements throughout Flintshire cannot be ruled out. Site allocations are often adjacent to, or within, areas of similar built form and this may help to avoid or mitigate negative impacts in many cases.
12 Heritage	-	Development management and strategic policies in the LDP are designed to ensure that the rich cultural heritage of Flintshire is preserved and enhanced and that new development avoids or mitigates negative impacts as much as possible. This would largely be achieved through requiring development to be designed, laid out and positioned in a manner that respects the local setting. However, as with IIA Objective 11, negative impacts cannot be ruled out primarily due to the loss of open space and greenfield land that alters the views of and from heritage assets such as Listed Buildings.
13 Water	-	Development management and strategic policies in the LDP seek to ensure that new development in Flintshire is relatively water efficient whilst also avoiding negative impacts on natural waterbodies. It is likely that the overall efficiency of water management in Flintshire will improve over time. However, given the scale of development being pursued a net increase in total water consumption in Flintshire is likely. Sites allocated for new development are often in rural locations within 100m of natural waterbodies or near the coastline. Development in these locations would make achieving water quality improvement targets more difficult due to the increased risk of contamination or pollution from surface waters as a result of greenfield land (which provide natural water filtering services) being replaced with hard standing.
14 Flooding	-	Policies in the LPD seek to ensure that no new development in Flintshire increases the risk of flooding faced by local people and buildings. However, there are extensive flood risk areas in the county and it has not been possible to allocate sites away from land at risk of flooding, particularly employment sites of which several are on land a high risk of flooding (although employment use is compatible with a higher risk of flooding than residential use). The majority of allocated sites are currently greenfield and replacing permeable soils with hard standing could to some extent alter the characteristics of overland flow of surface waters. This would to some extent be avoided or mitigated by policies requiring proposals to incorporate sustainable drainage systems into development as well as the protection of green spaces in some areas, but an overall minor negative impact on this IIA Objective cannot be ruled out.
15 Air quality and GHGs	-	The LDP sets out various policies that would be likely to encourage higher rates of walking, cycling and public transport uptake. It also encourages more energy efficient buildings, improved access to electric vehicle charging infrastructure and increase generation of renewable energy. The LDP also allocates two new sites for solar farm developments. In addition, most new sites allocated for residential, or employment development facilitate relatively efficient movements for local people with only short journeys required to access key services, amenities and employment areas. However, the scale of the development proposed in the LDP, including the significant growth in housing and employment development, would be
16 Energy	-	

IIA Objective	Overall score	Description of effects
		expected to lead to a net increase in energy consumption and congestion in Flintshire that results in an overall minor negative impact on air quality and carbon emissions.
17 Natural resources	-	The scale and distribution of development sought through the LDP would be expected to lead to a significant, permanent and irreversible net loss of soils throughout Flintshire. This would be mitigated to some extent by policies seeking to ensure that development makes a relatively efficient use of land; that valuable mineral areas are safeguarded and that fields and open spare are protected as well as due to national policy that requires the best and most versatile agricultural soils to be protected from development. It is likely that the increase in local construction and the number of households and businesses would increase local rates of the consumption of materials and the amount of waste sent to landfill. Several development management policies would be expected to help enhance the efficiency of Flintshire's waste management system and could encourage higher rates of reduce, reuse and recycle, but are unlikely to entirely prevent an overall net increase in materials consumption and waste generation.
18 Welsh language	+	A key Objective of the LDP is to protect and support the Welsh Language. This has been carried through to Policy STR4 on the Principles of Sustainable Development, Design and Placemaking i.e., new development must ensure that it supports and sustains the long-term wellbeing of the Welsh language. New sites allocated for development in the LDP, for the most part, would provide new residents with access to Welsh-language learning opportunities at schools. Some sites are within proximity to Welsh-only schools. New development is situated within a range of different rates of Welsh-speaking. Where the rate of Welsh-speaking is relatively high there could be a risk of new residents diluting these rates or, alternatively, it could be an effective means of situating large numbers of new residents within communities of high Welsh-speaking rates and thus encourage an even greater uptake. It is generally considered that no single community or settlement would be subject to development of a scale that could discernibly dilute rates of Welsh-speaking.

Summary of the HRA

2.3.41 Separate to the IIA, an HRA of the LDP was prepared to determine if any policies or site allocations in the LDP, whether alone or when considered cumulatively, could potentially result in a likely significant effect (LSE) on a European site. The HRA Addendum¹¹ also took into consideration the Matters Arising Changes. All other MACs not relating to water quality with regards to Phosphate levels in the River Dee were screened out.

2.3.42 In respect of the potential effects from discharge of wastewater on the River Dee and Bala Lake SAC, following Appropriate Assessment, and taking account of the proposed additional mitigation provided by policy EN15, and demonstrated within the DCPRS, it can be concluded that all policies will have no adverse effect on the integrity of the SAC. Policy EN15, as amended, and the delivery of mitigation through the DCPRS, can be relied upon to avoid adverse effects to site integrity as a result of the discharge of wastewater.

Integrated Assessments

Equalities

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

¹¹ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/FCC/FCC032-Habitat-Regulations-Assessment-HRA-Addendum.pdf> [Accessed: 06/01/23]

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

Health

2.3.45 Health has been considered throughout the IIA process, with the effect on health for the proposed development and policies have been assessed primarily through IIA Objective 3 but linking to a range of Objectives when considering the effect on air quality, communities, and crime. The assessments have identified, where appropriate, potential impacts on human health, with particular focus on physical health and mental well-being, but also taking into consideration health inequalities.

2.3.46 The proposals set out in the LDP would be result in improvements in health of the population of Flintshire, encouraging active travel and promoting mental well-being. The LDP direct new development towards existing communities to help encourage walking and cycling to services, including GP services. Being in close proximity to services helps to improve local air quality as well, which can be detrimental to health. The LPD seeks to enhance the sense of community in settlements, which can facilitate positive relationships. I

2.3.47 The Rapid Participatory Health Impact Assessment Workshop on the Flintshire LDP Final Report was prepared in December 2019¹². This document reports on the outcome and recommendations of the rapid participatory HIA workshop on the LDP held in December 2019 by Public Health Wales. The rapid participatory workshop was part of the overall consultation process to consider and include professionals' views on the potential impacts of the plan on Health and Well-being of the population in Flintshire. The HIA workshop enabled attendees to gain further insight and a greater understanding of the LDP and the HIA process that has supported the LDP development.

Examination

2.3.48 The Local Plan was submitted to the Secretary of State for independent Examination on 30th October 2020.

2.3.49 Inspector wrote to the Council in November 2020 with 31 questions seeking key information on a range of matters ahead of the start of the Hearing Sessions. The Council published a response in November 2020¹³.

2.3.50 The Inspector then issued a series of Hearing Session Timetables setting out which 'Matters' would be discussed at which Hearing Sessions¹⁴. There were initially 20 hearing sessions programmed between 13th April and 20th May 2021. The hearing sessions were arranged in a logical order looking at LDP preparation, strategy then more detailed matters, broadly in the same order as presented in

¹² Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/2019-12-20-Flintshire-HIA.pdf> [Accessed: 06/01/23]

¹³ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/Flintshire-LDP-EiP-Inspectors-Prelim-Questions-and-Responses.pdf> [Accessed: 06/01/23]

¹⁴ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/INSP/INSP005-Draft-Hearing-Session-Timetable.pdf> [Accessed: 06/01/23]

the LDP. The key sessions were in relation to strategic growth and the strategic sites, the location of development, housing sites and green barrier and these were the sessions that were best attended. The two key issues arising from the scheduled hearing sessions was phosphates and the Warren Hall Strategic Site.

- 2.3.51 In respect of Warren Hall, the Inspector arranged a further session to discuss matters raised by Airbus in relation to the height of development and safeguarding of the flight path to Hawarden Airport and also in relation to the Inspectors questions about the strategic site, in particular the housing element of the allocation. The Inspector wrote to the Council at the end of programmed hearing sessions and set out her concerns in relation to the Warren Hall site¹⁵. The Council prepared further evidence with respect to the matters raised and the additional hearing session was held on 21st September 2021.
- 2.3.52 In respect of phosphates, the Inspector concluded at the Hearing Session for Matter 1 that the issue of phosphates would need to be revisited later in the Examination process. It is following this that Flintshire and Wrexham, and their consultants Arcadis and DTA, prepared the Dee Catchment Phosphorous Reduction Strategy (DCPRS)¹⁶. A further hearing session was arranged for 23rd November 2021 which considered both the phosphates issue and also the draft Matters Arising Changes. The Inspector wrote a number of letters to the Council explaining that she was content in respect of the approach taken with phosphates and with the ability of the LDP to deliver the housing requirement figure.

IIA Matters Arising Changes Addendum

- 2.3.53 The Council compiled a draft schedule of Matters Arising Changes primarily resulting from Action Points taken from the Examination Hearing Sessions, and which were agreed with the Inspector at the end of each session. The Matters Arising Changes also include other changes arising from i) the Council's responses to representations where the Council suggested a revision to the LDP, ii) the agreed Statement of Common Ground with Natural Resources Wales (NRW) and iii) further revisions referenced in the various Council Hearing Statements.
- 2.3.54 The majority of the Matters Arising Changes were minor editing changes which do not affect the meaning or implementation of a policy and sets out amendments to the LDP to take into account Planning Policy Wales – Edition 11 (PPW)¹⁷.
- 2.3.55 The amendments include change to policy wordings, explanatory text and proposals maps which are considered necessary to demonstrate soundness of the LDP. No changes were made to the identified cumulative effects as a result of the MACs.

Inspectors Report

- 2.3.56 The overall conclusion of the Inspector's Report states: "*We conclude that, with the binding recommended changes identified in this report and set out in Appendices A and B, the Local Development Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness in PPW. In reaching this conclusion, we have taken into account the ways of working set out at section 5 of the WFG Act and are satisfied that the Local Development Plan as modified will*

¹⁵ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/INSP/INSP010-Post-Hearings-Letter.pdf> [Accessed: 06/01/23]

¹⁶ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/FCC/FCC031-Phosphate-Strategy.pdf> [Accessed: 06/01/23]

¹⁷ Available at: <https://gov.wales/planning-policy-wales> [Accessed: 06/01/23]

guide the development and use of land in a way that contributes towards improving the economic, social, environmental and cultural well-being of Wales and complies with the WFG Act”.

2.3.57 In reaching this conclusion, the Inspectors began by looking at the key issue of phosphates and whether this would impact on delivery of development. The Inspectors concluded “*We are satisfied that, despite the uncertainties thrown up by the need for phosphorous mitigation, the LDP housing requirement will be delivered during the Plan period*”.

2.3.58 The Inspectors then looked at the matters raised in representations in Plan order commenting on each of the following:

- Plan preparation
- Plan Strategy and Strategic Growth
- Location of Development
- Economy and Employment
- Housing including site selection and specific allocations
- A range of other matters including HMO’s, Gypsy and Traveller Accommodation, Natural Environment, Climate Change and minerals.

2.3.59 In each case the Inspectors commented that the approach was consistent with PPW and based on robust and credible evidence.

2.3.60 Two MACs were further amended within the Inspector’s Report: MAC58 and MAC61. It was determined that MAC58 was not necessary and supported MAC61 subject to the deletion of the final sentence (see Table 2-9). These amendments are minor and were determined not to affect the findings of the IIA Addendum.

Table 2-9: Schedule of Matters Arising Changes amended through Inspector’s Report

MAC Ref.	Policy/ Para	Matter Arising Change	Reason
MAC 058	PE1	Add at the end of the introductory wording of PE1 ‘ with the exception of the Northern Gateway site which is allocated for B2 and B8 uses and the Warren Hall site which is suitable for B1 and B2 uses ’. The revised wording is ‘The following sites, as defined on the proposals map, are allocated for B1, B2 and B8 employment uses, with the exception of the Northern Gateway site which is allocated for B2 and B8 uses and the Warren Hall site which is suitable for B1 and B2 uses: ’	To clarify that the Northern Gateway site is not suitable for B1 uses and that Warren Hall site is not suitable for B8 uses.
MAC 061	PE1 10.1	Delete para 10.1 and the accompanying table and replace with ‘ The Plan allocates 124.97ha of land for employment development. This comprises the two strategic mixed use sites at Northern Gateway and Warren Hall and several other more local allocations. The Plan provides a range of employment sites in terms of location, size and type to suit a variety of investments needs. All sites are intended to accommodate B1, B2 and B8 employment development with the exception of Warren Hall which is B1 and B2 only. ’	To reflect changes to employment allocations in PE1 including reduced employment area at Warren Hall.

2.4 Monitoring

2.4.1 The SEA Regulations require that the plan is monitored, to measure the effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any undesirable environmental effects are identified, and remedial action is implemented accordingly. Based on the assessment conducted on the options and identification of potential significant environmental effects, a monitoring framework has been prepared and is presented in Chapter 5 of this Post Adoption Statement.

2.5 How the findings of the IIA have been taken into account

2.5.1 The IIA Reports have appraised housing growth options, spatial options and a number of site location options throughout the plan-making process.

2.5.2 Throughout the plan-making process, the Council's decision making has been informed by the sustainability performance of options identified during the accompanying IIA process. Sustainability is a fundamental goal and a consistent thread running throughout the Flintshire LDP. The IIA has provided recommendations to the Council in an iterative process that are typically in the form of policy wording changes, or development management related recommendations for site allocations, designed to help avoid or minimise negative impacts and to enhance positive impacts. Many of these recommendations have been adopted by the Council and have made a provable improvement to the sustainability performance of the Flintshire LDP.

2.5.3 Recommendations have been provided to the Council, and consulted on, across three stages of the IIA:

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

2.5.4 The Council's responses to the IIA recommendations are set out in section 3.7 of IIA Addendum¹⁸ and repeated in section 2.3 above. This section sets out how the Council incorporated the IIA recommendations into policy wording or is dealt with in other document including Supplementary Planning Guidance (SPGs). If the Council determined that the recommendations were not achievable, the Council have set out reasonings for this.

¹⁸ Available at: <https://www.flintshire.gov.uk/cy/PDFFiles/Planning/Examination-Library-Documents/Addendum-Integrated-Impact-Assessment.pdf> [Accessed: 03/01/23]

3 How the opinions of the Consultation Bodies have been taken into account

3.1 Consultation on the LDP

3.1.1 The development of the LDP has been informed by ongoing public engagement and consultation, in accordance with the Town and Country Planning Regulations. Table 3-1 sets out the key consultations that took place during the Plan's development. All documents can be found on the LDP Submission page¹⁹.

Table 3-1: Local Development Plan documents and where to find them

Local Development Plan Documents	Consultation held
Candidate Sites	Initial Call for Sites 28 th February to 30 th May 2014. Further Call for Sites (Minerals, Waste and Gypsy and Traveller Sites) 30 th June to 11 th August 2017. Opportunity for alternatives sites was during the Preferred Strategy consultation 9 th November to 21 st December 2017.
Key Stakeholder Forum	Meetings on 27 th February 2015 and 12 th October 2016.
Topic Papers	9 th March to 20 th April 2015
Key Message Document	18 th March to 29 th April 2016
Strategic Options	28 th October to 9 th December 2016
Preferred Strategy	9 th November to 21 st December 2017
Deposit Plan	30 th September to 11 th November 2019
Matters Arising Changes	17 th June and 29 th July 2022

3.2 Consultation on IIA Reports

3.2.1 The IIA Reports that have been prepared, and where they can be accessed online, are set out in Table 3-2. This also includes reference to where further information on responses to each consultation are recorded and how opinions of the consultation bodies have been taken into account.

Table 3-2: IIA Reports and where to find them

IIA Reports	Where to find them
IIA Scoping Report (2015) [prepared by Hyder which was bought out by Arcadis]	https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA-SA-scoping-Report-Mar-2015.pdf
Strategic Options IIA Report (2016)	https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA2-SA-Strategic-Options-Oct-2016.pdf

¹⁹ Available at: <https://www.flintshire.gov.uk/en/Resident/Planning/Submission.aspx> [Accessed: 06/01/23]

IIA Reports	Where to find them
Preferred Strategy LDP: Interim IIA (2017)	https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA3-IIA-Preferred-Strategy-Oct-2017.pdf https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA3.1-IIA-Pref-Strat-Non-Tech-Sum-2017.pdf
Deposit LDP: IIA Environmental Report (2019)	https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA4-Deposit-IIA-Sept-2019.pdf https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA4.1-Deposit-IIA-Appendix-A-D.pdf https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA4.2-Deposit-IIA-Appendix-E.pdf
IIA Matters Arising Changes Addendum (December 2021)	https://www.flintshire.gov.uk/cy/PDFFiles/Planning/Examination-Library-Documents/Addendum-Integrated-Impact-Assessment.pdf

3.3 Consideration of Responses

- 3.3.1 The opinions expressed throughout the consultation outlined above have informed the scope of the IIA, helping to in turn to shape the development of the LDP.
- 3.3.2 The Plan went through a number of early engagement phases which had the objective of building consensus as the Plan progressed. In particular, an additional stage called the Key Messages document was the subject of engagement to determine the LDP's Vision and Strategic Objectives as well as the settlement hierarchy and supporting settlement audits.
- 3.3.3 At each stage, representations were considered by Planning Officers and presented to and discussed at Planning Strategy Group. This was a cross party working group which had no decision-making powers but endorsed the LDP and evidence base prior to any formal decision making by Cabinet or Council. Where necessary and appropriate, changes have been made to the Plan at each stage. This is set out in more detail in the Consultation Reports^{20 21 22 23}.
- 3.3.4 When the Council consulted on the Deposit LDP, this was on the basis that it was a sound Plan and capable of being submitted for Examination (in accordance with WG guidance in Development Plans Manual). It is for this reason that no Focussed Changes were made to the Deposit LDP following the consultation. The representations on the Deposit LDP were considered in detail and the Council responded to each response²⁴. In its responses, the Council suggested that minor amendments to the LDP may be appropriate and that these would be considered as part of the Examination.

²⁰ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-CR1-Consultation-Report-Oct-2020.pdf> [Accessed: 06/01/23]

²¹ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-CR1a-Consultation-Report-Appendices-21a-to-24.pdf> [Accessed: 06/01/23]

²² Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-CR1b-Consultation-Report-Appendices-25a-to-29d.pdf> [Accessed: 06/01/23]

²³ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-CR1c-Consultation-Report-Appendices-30-to-33.pdf> [Accessed: 06/01/23]

²⁴ Available at: <https://consult.flintshire.gov.uk/portal/planning/ldp/ldp/representations> [Accessed: 06/01/23]

4 The reasons for choosing the adopted LDP in light of the reasonable alternatives considered

4.1 Overview

- 4.1.1 SEA Regulation 12 (2) requires that “an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated”.
- 4.1.2 Information to be provided includes “an outline of the reasons for selecting the alternatives dealt with” (SEA Regulations Schedule 2 (8)) and an overview of types of alternatives considered (development scenarios, site allocations etc.).
- 4.1.3 In ‘*R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] Env LR 1*’, Hickinbottom J found the following, with regards to reasonable alternatives:

“iv) “Reasonable alternatives” does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.

v) Article 5(1) refers to “reasonable alternatives taking into account the objectives... of the plan or programme...”. “Reasonableness” in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. An option which will, or sensibly may, achieve the objectives is a “reasonable alternative”. The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no “reasonable alternatives” to it.

vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process”.

4.2 Appraisal of Alternatives

- 4.2.1 Alternatives must be realistic and are likely to emerge during the plan-making process. Alternatives have been a focus for several legal challenges within the UK, and so it is important to ensure reasonable alternatives are meaningfully considered. If there are genuinely no reasonable alternatives to a plan proposal, alternatives should not be artificially generated.
- 4.2.2 Throughout the LDP and its accompanying IIA process, all reasonable alternatives have been assessed for their likely sustainability performance. The results of these assessments have then

informed the Council's decision-making over which options should be their 'preferred options' and ultimately proposed in the LDP.

Alternative Sites

4.3 Justification for the selection and rejection of reasonable alternatives

Preferred Strategy

- 4.3.1 After careful consideration of the options available, the Council identified their preferred strategy for the LDP and underwent a pre-Deposit consultation on a Preferred Strategy LDP between 09 November 2017 and 21 December 2017. The Preferred Strategy LDP (2017) also set out the Council's preferred spatial strategy, which remains in the final LDP. The preferred option for the spatial distribution of development is based on Spatial Option 5 of 'Sustainable Distribution plus a Refined Approach to Rural Settlements', whereby growth is directed to the top three tiers of the settlement hierarchy and in the bottom two tiers provision is focussed on meeting local needs.
- 4.3.2 The Preferred Strategy LDP (2017) set out the Council's preferred option for growth, which remains unchanged in the final LDP. The preferred option at the Deposit LDP for the level of growth is for the LDP to seek to deliver 8-10,000 jobs through approximately 223ha of employment land, supported by a housing provision for 7,645 new homes to meet a housing requirement of 6,950 dwellings. This represented a mix of Growth Options 4 and 6. Following the Matters Arising Changes, this was amended to the delivering of 124.97ha of employment land and 7,870 new homes.
- 4.3.3 Local demographic, housing and economic information has been used to select the preferred option. The growth options are informed by demographic trends and projections and the effect of different assumptions in producing options. A further consideration is the ability of the market and development industry to deliver the development that the Plan will make provision for. The Council is seeking a level of growth based on the prevailing economic conditions in Flintshire, the availability of development finance, or the capacity of local and regional developers to respond to the provision made by the Plan, set against a local landbank.
- 4.3.4 Central to the Council's justification for the proposed growth option is that there is an essential need to ensure that the level of growth being pursued is viable and deliverable. Based on feedback from a number of developers operating locally in response to the Strategic Options consultation there was a general consensus that the higher growth options were not appropriate or achievable.
- 4.3.5 The Council recognises that to simply rely on a relatively low level of projected household growth would not provide a sound basis to develop and support the growth ambition for the LDP, triggered by the need for economic recovery and job growth, capitalising on Flintshire's location and role in the local and wider sub-regional economy. The Strategy aims to promote economic development and the County's contribution to the wider regional economic Growth Vision, with the need to enable the delivery of jobs, homes and where necessary, infrastructure, required to accommodate this growth sustainably.
- 4.3.6 Each Strategic Option was assessed for its likely sustainability effects in the IIA of Strategic Options SA Report (October 2016). The assessment was undertaken using a simple matrix-based approach,

in Autumn 2016. The recommendations provided contributed to their refinement and definition of the Preferred Strategy.

- 4.3.7 In relation to the Spatial Options, the different options all scored similarly across the environmental Objectives in terms of development, as it was anticipated that most sites coming forward will be on greenfield land. Compared to the similarities of the assessment outcome between the five Options and the environmental Objectives, a greater variation was seen between the Options when assessed against the social and economic IIA Objectives. Option 1 was relatively rigid in how it determines numbers of housing according to the definition given to a particular settlement, and hence, higher growth scenarios could fail to recognise that some settlements do not have capacity to meet such a growth in housing numbers. Spatial Options 2, 3 and 4 perform similarly with regard to the social and economic Objectives, as they are all particularly focussed on a particular geographical aspect of development (Option 2 looking at existing urban growth, focussing growth only in Main and Local Service Centres, Option 3 looking at growth in identified settlements only, according to the Wales Spatial Plan, and Option 4 along transport corridors). Spatial Option 5 is a variation of Option 1 but uses a more case-by-case approach to ensure that rural growth and viability is guided by local circumstances.
- 4.3.8 The Council's key reasons for pursuing the preferred strategy (as identified by the Council in 2017) include:
- Maintain an employment land portfolio of 139.67 hectares to reflect Flintshire's strategic location, historical pattern of development, and provision of a choice of investment opportunities.
 - Aim to facilitate Flintshire's contribution to the regional Growth Vision job creation aspiration, by enabling 8-10,000 jobs to be created;
 - Ensuring a housing land supply to provide for 7,950 dwellings to meet an LDP housing requirement of 6,950 dwellings;
 - This requirement is derived from the employment-led growth option and provides sufficient housing to support economic growth;
 - This equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 (573 over the last 5 years). Completions in the first three years of the Plan period have averaged 563 (1,691 in total), showing that the Plan is on track in terms of enabling delivery;
 - There is capacity for a further 1,771 dwellings on sites with planning permission (commitments) which are either under construction or expected to be delivered within 5 years. The Plan makes modest allowances for wind fall and small sites development and the evidence base shows that greater potential capacity exists here;
 - Whilst the residual requirement for new sites is 879, the Plan has allocated 1,874 dwellings on sustainable new sites, providing as a consequence for an overall flexibility of 14.4%. This is a generous over-provision and will help ensure the overall deliverability of the Plan's housing requirement;
 - The Plan has chosen a sustainable and flexible approach to distributing growth in the upper three tiers of the sustainable settlement hierarchy, within the main and local service centres, as well as the sustainable villages;
 - Part of the approach to enabling growth has been to allocate sufficient sites to provide a range of choice of viable development options, whilst also ensuring that the significant land bank of undelivered permissions is also brought forward. Whilst the Plan also has two strategic site allocations with significant elements of housing, the Plan is not over-reliant on these, and in any event a significant element of delivery of housing on the larger of the two sites at Northern Gateway is imminent via two applications for large phases of housing. The Plan's aim of a 15% flexibility allowance will also help balance this strategic commitment;
 - The spatial strategy comprising two strategic sites and a range of smaller housing allocations is considered to sit comfortably alongside the spatial strategy of Chester West and Chester Council

which includes a strategic mixed-use development at Wrexham Road, Chester and that of Wrexham County Borough Council which includes two strategic allocations at Wrexham town and a range of smaller housing allocations;

- Green Barriers (wedges) have been reviewed and designated to strategically manage growth and urban form, and to fulfil their role in maintaining the openness of the area they cover;
- The Council has worked with infrastructure providers in the development of the Plan to ensure that there is sufficient capacity to accommodate growth, or that capacity can be increased, how, and when, in order for development to take place; and
- The sites allocated in the plan to provide for growth are also deliverable, having been independently assessed in terms of their viability. There are therefore no barriers to deliverability within the Plan, and it will be for the development industry to respond positively to the opportunities offered by the Plan.

4.3.9 Through the Matters Arising Changes, and due to the passing of time (i.e. some site allocation being built out), the final growth strategy varies slightly to the chosen strategy in relation to employment land and housing numbers.

Preferred Allocations

4.3.10 In order to arrive at the list of allocated in the LDP, the Council considered a range of alternative locations for development and have ultimately selected sites that would accommodate the required levels of development, are available, viable and deliverable whilst conforming with the LDP preferred strategy. The sustainability of each location has also been a key consideration for the Council when allocating sites for development.

4.3.11 Table 4-1 below lists the reasonable alternative sites considered and assessed in the Deposit LDP. The IIA results in full can be found in Appendix E of the Deposit IIA.

Table 4-1: reasonable alternative sites considered at the Deposit LDP stage

LDP Policy / site ref.	Location	Proposed/potential development
BUC022/035	Adj Catheralls Ind Est	Housing
DRU001	Bank Lane Holding (Land west of Bank Lane)	Housing
HOL017	Land South of Ffordd Beuno, Holway	Housing
HOL024-AS	Land North of A5026 / West of Ffordd Beuno, Holway	Housing
MOL047 & 046	Land South of Gwernaffield Road	Housing
MOL017	County Hall	Housing
BROU001	Bretton Road	Housing
GRE002	Tan Y Felin	Housing
HCAC025	Pool House, Denbigh Rd/West of Beechwood Close	Housing
CAE006	North of Summerhill Farm	Housing
BUC030/037	Chester Road / Bannel Lane	Housing
DRU009	Woodside Cottage, Bank Lane	Housing
LEE004	Side/Rear Wesley Methodist Church, King Street	Housing
MOS002	Ffordd Pennant	Housing
NEW003	Land Between Moorcroft and A494(T)	Housing
NEW001	Land East of Haven Green, A5119	Housing
BAG014	Former Canton Depot	Housing
NEWSITE	Bedol Farm	Housing
NEWSITE	East of Drury New Road	Housing
NH020	Land South of Wellfield Farm, Village	Housing
PEN037	Land North of Wood Lane Farm	Housing
SYCH022	Land North East of the Vownog Cottage	Housing
NEWSITE	Halkyn Road	Housing
COE005	Former Clwyd Alloys	Housing
LEE007	Southern Part of Former Laura Ashley Site	Housing

- 4.3.12 The Council's process of identifying sites available for development and selecting their preferred options from these has been a lengthy, thorough and robust process supported by numerous studies and evidence documents as well as consultation with stakeholders at key stages. The Council have prepared a background paper for the Deposit LDP titled 'Background Paper 8: Assessment of Candidate and Alternative Sites'²⁵ which provides a clear and proportionate justification for the Council's selection of allocated housing sites in light of the reasonable alternatives dealt with. Generally speaking, the Council have sought to allocate sites that comply with the LDP strategy and have clear sustainability benefits.
- 4.3.13 The Council have considered that reasonable alternative sites for other types of development, such as mineral sites or Gypsy and Traveller sites, were not available for consideration.

Post Examination Reasonable Alternatives

- 4.3.14 Amendments to the LDP were proposed during the Examination Hearings. Most of these changes arose from the agreement of Action Points at the end of each Hearing session. This discussion involved a recap of the points covered at that session and the changes/ further work required were recorded by Council Officers. Participants of the Examination hearing also had the opportunity to contribute. The Action Points were then agreed by the Inspector before they were published by the Council. At a session, the Inspector would have had the benefit of alternatives to:
- retain a site un-amended;
 - retain a site amended; or
 - delete a site.
- 4.3.15 Similarly, with policy wording changes, there were different options presented by the Council, the objectors, and sometimes, the Inspector. The Action Point reflected what the Inspector thought was the best fit. In a small number of cases, the Inspector went away and gave further thought to this and provided the Council with amended wording.
- 4.3.16 Many changes to policy wording were triggered by the publication of the PPW, and therefore, there are no reasonable alternatives to these changes, as any other options would not be in line with the latest Welsh Planning Policy.
- 4.3.17 Six employment sites were removed from the LDP during the examination, to reflect the lack of sufficient evidence to demonstrate that the effects of flooding can be acceptably managed on these allocations. Amendments were made to the allocation at site STR3B to reflect the reduced employment area at Warren Hall. In relation to site STR3B, the Inspector had the following options before her:
- i. retain the allocation with the housing element;
 - ii. retain the allocation with the housing element deleted; and
 - iii. a variation of ii. where she replaced the housing element with an alternative housing site elsewhere.
- 4.3.18 The Inspector chose option ii.

²⁵ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Evidence-Base-Documents/Background-Papers/LDP-EBD-BP8-Background-Paper-LDP08-Candidate-Alternative-Sites.pdf> [Accessed: 10/01/23]

4.3.19 There are no further reasonable alternatives for the Council to consider to the MACs as they were proposed by the Inspector. Alternatives to these proposed changes are not considered reasonable, as alternatives have the potential to result in the LDP being found to be unsound.

5 Measures to monitor significant environmental effects

- 5.1.1 The IIA has identified the likely effects of the LDP on IIA Objectives. An indication of the certainty and timescales of these effects has also been predicted. However, there is a risk that the sustainability effects of the LDP, including the effects of specific aspects or the cumulative effects of LDP in-combination, are different to those anticipated due to unforeseen circumstances.
- 5.1.2 The SEA Regulations require that potential significant effects which may occur as a result of the implementation of the strategy be monitored. The SEA Regulations state that: *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”*.
- 5.1.3 It is anticipated that the Flintshire County Council will be monitoring the implementation and effects of the Local Plan post-adoption to feed into future plan review and revision. Table 5-1 suggest a possible list of indicators that could be considered in developing the LDP Monitoring Framework.

Table 5-1: Proposed Monitoring Framework

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

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency
	noise and light pollutants, which should be avoided and monitored		North Wales Combined Authority Annual Air Quality Progress Report	
7. To promote a sustainable economy, business development and investment	The LDP will enable sustainable economic growth	<ol style="list-style-type: none"> 1. Gross Value Added per head, seeking an increase; 2. Value Added Tax, seeking an increase; and 3. Economic activity rate, seeking an increase. 	Development management, FCC	Every three years
8. To provide employment opportunities across the County and promote economic inclusion	The LDP would help to facilitate growth in local employment opportunities	<ol style="list-style-type: none"> 1. Number of LSOAs in bottom 10% employment deprived; 2. Percentage of 16-64-year olds unemployed; 3. Proportion of businesses in Flintshire hiring locally; 4. Employment in different sectors, seeking to ensure a varied mix; 5. Number of LSOAs in bottom 10% for income deprivation. 	Index of Multiple Deprivation Office for National Statistics data on labour market	Every three years
10. To protect and enhance biodiversity and geodiversity	The LDP could have adverse effects on biodiversity in some locations.	<ol style="list-style-type: none"> 1. Number of development schemes which adopt biodiversity enhancement measures; 2. Total tree canopy in the County, targeting a net increase; 3. Condition of SSSIs in the County. 	Development management, FCC NRW SSSI survey results	Every three years
11. To conserve and enhance the County's landscape and townscape character and quality	The LDP could have adverse effects on landscape in some locations.	<ol style="list-style-type: none"> 1. Amount of development in the countryside; and 2. Development within, adjacent to or viewable from the AONB. 	Development management, FCC	Every three years
12. To protect and enhance the cultural heritage assets	The LDP could have adverse effects on the historic environment in some locations.	<ol style="list-style-type: none"> 1. Proportion of new development that adopts avoidance or mitigation measures in relation to heritage assets 2. Number of Listed Buildings, on the at-risk register, seeking a reduction. 	Development management, FCC	Every three years
13. To protect and enhance the quality of water features and resources	The LDP could pose a risk to the quality of water in natural waterbodies in some locations. The LDP would result in a net increase in water consumption.	<ol style="list-style-type: none"> 1. Amount of new development each year that requires a consent to be built in proximity to the Dee 2. Water resource availability as per Water Resource Management Plans (every 5 years). 	Development management, FCC	Annual
14. To reduce the risk of flooding	The LDP would expose a limited number of residents	<ol style="list-style-type: none"> 1. Percentage of development with SuDS 2. Number of applications permitted contrary to NRW advice on flooding. 	Development management, FCC	Annual

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

6 Conclusion

- 6.1.1 This report satisfies the requirements of a Post Adoption Statement as per the SEA Regulations. The Flintshire LDP, at each iteration, has been appraised for its likely significant effects against each of the IIA Objectives within the Framework. The IIA is a process that has been highly integrated with the development of the LDP, involving a close working relationship between the IIA team and Council. The IIA has provided a structured way of considering the impacts of a wide range of options.
- 6.1.2 The IIA is used as a tool for consultation, providing the general public and statutory bodies with a breakdown of how the LDP has been developed in a way that will ensure that it can contribute to more sustainable development. The consultation, involvement and engagement process has given stakeholders the opportunity to provide feedback and suggestions towards enhancing the overall sustainability of the LDP.
- 6.1.3 Throughout the process, the IIA has provided recommendations which could help avoid or mitigate potential negative effects or enhance positive effects. Recommendations made to the Council have been a key feature of the IIA process from its inception. Key recommendations made, and the responses to these, are presented in previous IIA Reports and in this document. Flintshire County Council has proved highly receptive to measures for enhancing the sustainability performance of the LDP and subsequently made enhancements and amendments throughout.

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