

**Sustainability Appraisal and Strategic Environmental Assessment
of the Wrexham County Borough Council
Local Development Plan**

**Non-Technical Summary
Sustainability Appraisal (SEA) Report (Deposit Plan) February
2018**

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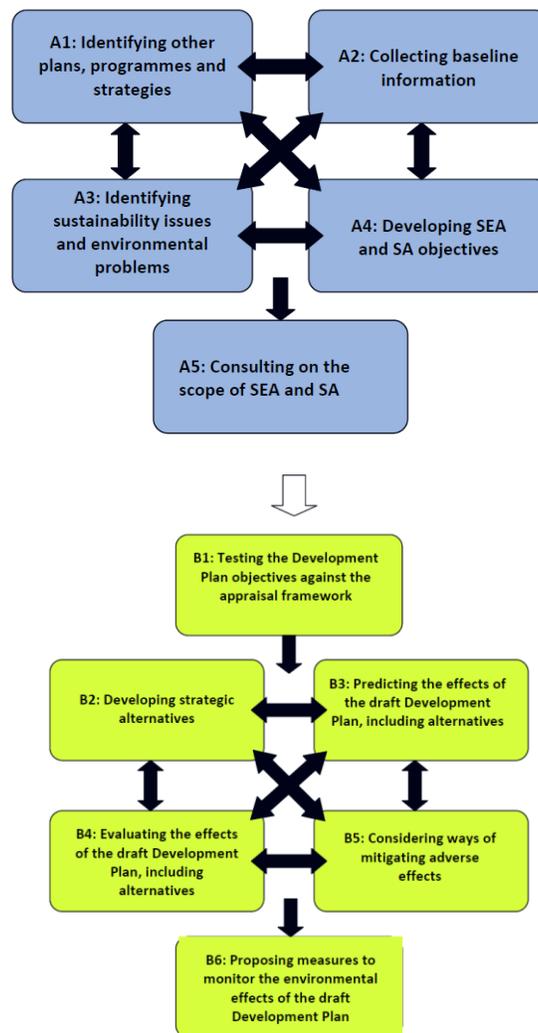
1.0 Introduction

1.1 This document is the non-technical summary of the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Deposit Local Development Plan (LDP) of the County Borough of Wrexham.

1.2 The Sustainability Appraisal (SA) Report tests how sustainable the Wrexham County Borough Council Deposit Local Development Plan (LDP) is. An SA of LDPs is required by the Planning and Compulsory Purchase Act 2004 and the European Strategic Environmental Assessment (SEA) Directive. SA identifies the LDP's likely significant economic, environmental and social effects, and aims to minimise any negative effects and maximise positive ones.

1.3 Wrexham County Borough Council carried out the SA. The SA findings were taken into account by the planning policy team, who changed parts of the LDP in response to the findings of the SA.

Figure1: SA Process



1.3 Figure 1 shows the SA process. A Scoping Report of October 2014¹ reviewed background relevant plans, policies and baseline information, and described the economic, social and environmental issues affecting Wrexham County Borough. It set up an appraisal framework which was then used to assess different alternatives to the LDP and parts of the LDP. Changes to Welsh Governments guidance in 2015 modified the framework to include integrated objectives to assess the plans performance. Where the LDP would have negative impacts, suggestions were made for reducing them.

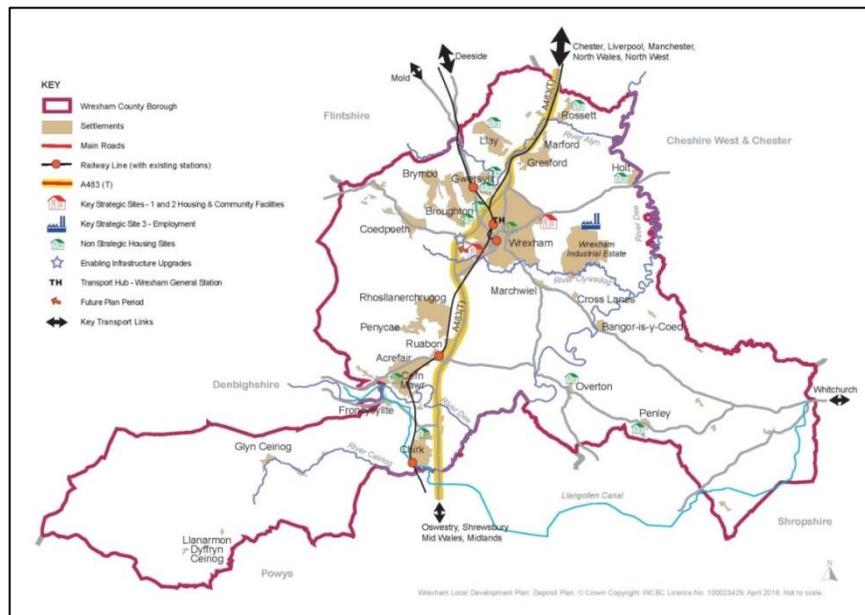
¹ <http://wrexhamldp.wrexham.gov.uk>

2.0 The Local Development Plan

2.1 The Deposit Plan for the LDP sets out:

- The plan purpose, background, how the Council have arrived at the Deposit Plan and sets out the context of the County Borough;
- The legislative framework, national, regional and local policy framework within which the Deposit Plan has been prepared;
- the key issues and drivers that have informed the Deposit Plan, which have been identified through preparation of the SA/SEA Scoping Report and a general review of social, economic and environmental evidence;
- the Council's vision for the future development of Wrexham County Borough, its objectives for delivering sustainable development and addressing the key issues and drivers;
- the plan strategy, level of housing and employment growth, spatial locations for growth with main planning issues and key diagram;
- high level, strategic policies that seek to deliver the LDP vision, objectives and strategy with further supporting information about related areas of national planning policy, the supporting evidence base, supplementary planning guidance and / or masterplans, relevant monitoring indicators and also the wellbeing goals are provided after each policy reason justification;
- detailed policies used to assess and make decisions on all planning applications in conjunction with the strategic policies;
- proposals maps relevant to the detailed policies;
- a monitoring framework for an ongoing assessment of whether the underlying LDP objectives remain valid or whether the prevailing economic, social, environmental or cultural circumstances have significantly altered since the preparation of the plan;

Figure 2: Key Diagram



3.0 Policy context – Task A1

3.1 Many policies and plans, from the international to the local level, influence Wrexham County Borough's LDP. These include the recent Planning Policy Wales 2016 version; Wellbeing of Future Generations Act, the North Wales Joint Local Transport Plan and Habitats Directive. Key messages from this policy context are that the LDP should:

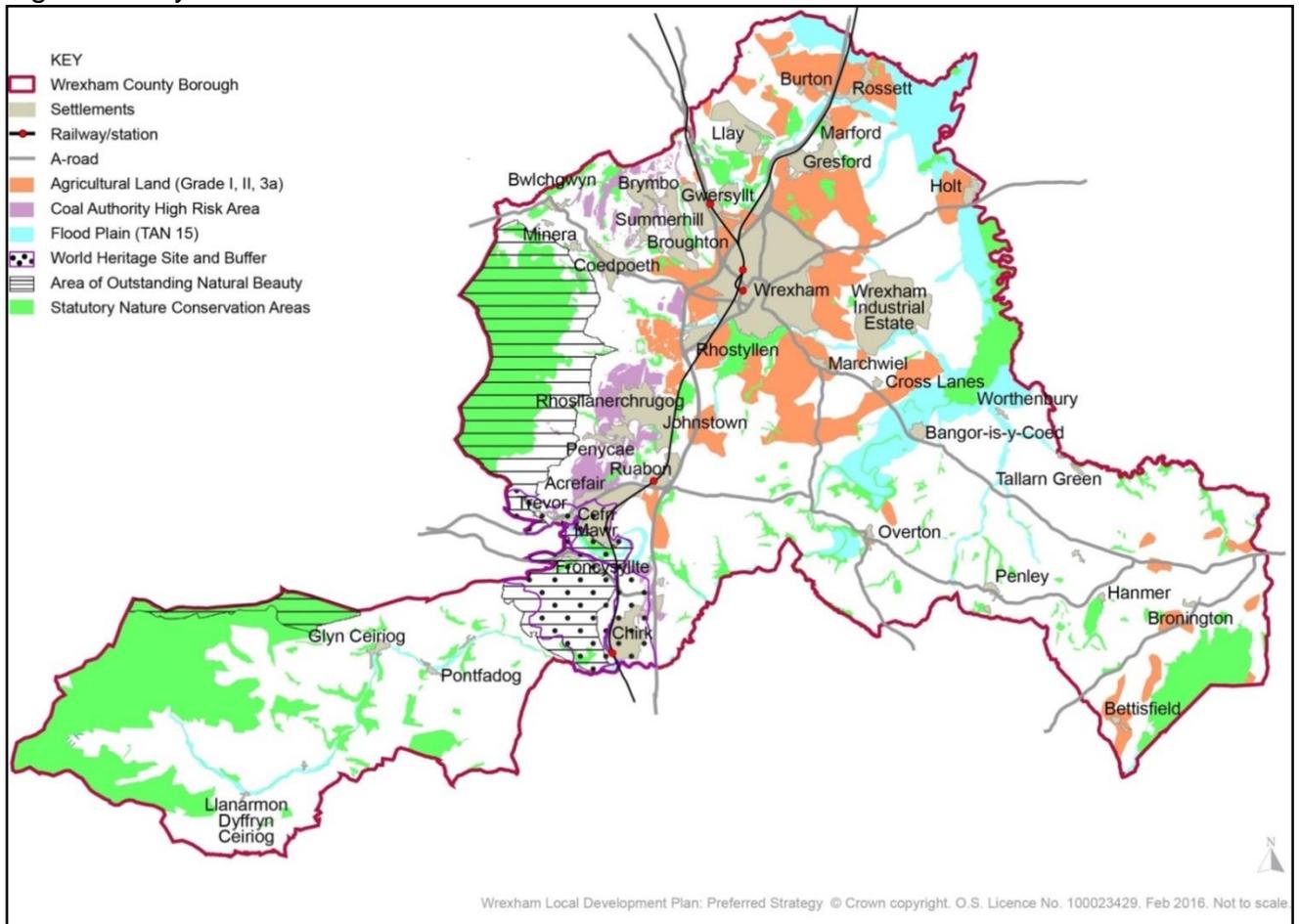
Table 1: Policy context

<p>Natural Environment (including Air Quality, Biodiversity, Flora, Fauna, Water Resources, Flooding, Natural Resources and Landscape)</p>	<ul style="list-style-type: none"> • Take account of the effects of development upon air quality and vice versa, and meet mandatory standards for air quality. • Protect and enhance biodiversity, natural habitats, wild fauna and flora and connections. • Protect designated landscapes, areas of local landscape value, landscape features and green networks • Conserve and, where possible, enhance the countryside and its resources, including the best and most versatile agricultural land • Promote urban regeneration and the re-use of previously developed land • Minimise adverse impacts on water quality • Ensure adequate water resources are available • Preserve and enhance soil resources • Plan for flooding and avoid flood risk
<p>Cultural Heritage and the Historic Environment</p>	<ul style="list-style-type: none"> • Protect the historic environment and cultural heritage. • Strengthen Wales' cultural identity including the Welsh language.
<p>Health, Recreation & Wellbeing</p>	<ul style="list-style-type: none"> • Improve health and well-being, and tackle poverty and inequality. • Increase participation in sport and physical activity. • Improve quality of life and enable social progress for everyone.
<p>Waste</p>	<ul style="list-style-type: none"> • Promote the waste hierarchy: reduce, reuse, recycle, recover energy and only then landfill
<p>Minerals</p>	<ul style="list-style-type: none"> • Provide a supply of minerals and protect mineral resources and sensitive areas
<p>Economy, Employment & Retail</p>	<ul style="list-style-type: none"> • Promote Wrexham's role as a sub-regional hub. • Enhance employment opportunities for all. • Ensure that employment development respects the environment. • Secure good retail provision and support town centres.
<p>Population & Housing</p>	<ul style="list-style-type: none"> • Provide an adequate supply of land to meet society's needs. • Ensure that everyone has good quality housing and access to jobs, facilities and services.
<p>Infrastructure</p>	<ul style="list-style-type: none"> • Ensure that key infrastructure is adequate to accommodate proposed development and sustain communities
<p>Climate Change & Energy</p>	<ul style="list-style-type: none"> • Reduce Carbon emissions and maximise resilience to climate change
<p>Transport</p>	<ul style="list-style-type: none"> • Extend choice in transport and extend accessibility in a way which supports sustainable development and help tackle the causes of climate change. • Encouraging a more effective and efficient transport system. • Greater use of the more sustainable and healthy forms of transport • Minimise the need to travel. • In relation to new development, priorities wherever possible, is that they are accessible first by walking and cycling, then by public transport, and finally by car

4.0. Baseline information – task A2

4.1 Much information about Wrexham's economic, social and environmental condition was collected as part of the SA. Figure 3 shows the main constraints to development in the County Borough.

Figure 3: Key Constraints



5.0 Sustainability issues and problems – Task A3

5.1 The main economic, environmental and social issues affecting Wrexham are:

Table 2: Sustainability Issues

Topic Paper 1 - Natural Environment
<ul style="list-style-type: none"> • Water quality needs to improve but is threatened by development • There are many protected sites and species in Wrexham County Borough vulnerable to habitat loss, pollution and fragmentation through development • Some parts of the County Borough are vulnerable to river flooding and the impact of climate change increasing flood risk. • Surface water flooding is the main cause of flooding in the County Borough • The main urban areas are surrounded by high quality agricultural land. • Land with contamination is frequent in the County Borough • The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty requires conservation and enhancement for its natural beauty. • Landscapes and green spaces have wide ranging benefits but are threatened by development
Topic Paper 2 – Built and Historic Environment
<ul style="list-style-type: none"> • The Pontcysyllte Aqueduct and Canal World Heritage Site requires protection • There are many features of historic and heritage value in the County Borough; listed buildings, conservation areas, listed buildings at risk, historic parks and gardens and historic landscapes that require protection; and many more unrecorded assets. • Important cultural assets need protection e.g. Bangor Racecourse, ‘Stiwt’, Chirk Castle, Wrexham Racecourse Ground and Pontcysyllte Aqueduct. • There are several key visitor destination hubs (World Heritage Site, Erddig, Chirk Castle and Wrexham) that present opportunities for sustainable tourism development.
Topic Paper 3 – Health, Recreation & Wellbeing
<ul style="list-style-type: none"> • The biggest health challenges are a population that is becoming increasingly obese or over weight, an ageing population and low activity levels. • Provision and access to open space is below standard in many areas discouraging active lifestyles • The Welsh language is a key element of local and Welsh identity, sense of place and culture. There are pockets where the Welsh language is significant but at risk. • Economic prosperity is a key element of improving health and wellbeing • There are pockets of significant deprivation within the County Borough which fall within the 10% most deprived in Wales. In 2008, 13.7% of children were living in workless households in Wrexham. There are two Community First clusters, Caia Park and Hightown and the Urban Villages Cluster.
Topic Paper 4 - Waste
<ul style="list-style-type: none"> • Waste sent to landfill has declined significantly as recycling rates improve. • More work needs to be done to reduce waste and further improve recycling rates
Topic Paper 5 - Minerals
<ul style="list-style-type: none"> • Wrexham County Borough is an important source of sand and gravel resources with reserves of coal
Topic Paper 6 – Economy, Retail and Employment
<ul style="list-style-type: none"> • Wrexham is identified as a key settlement of national importance, being part

of a key hub, business sector and regeneration area.

- There are issues with the quality and diversity of employment and employment land, rural and tourism development
- Wrexham town centre is a key destination but is in need of regeneration supported by district retail centres.
- Economic regeneration is required to rejuvenate some of the more deprived areas of the County Borough and to manage change.

Topic Paper 7 – Population and Housing

- The population of Wrexham County Borough has grown from 128,500 in 2001 to 134,800 in 2011. Driven by a reduction in household size (ageing population, divorces etc.) and by an increase in migration (from within the UK and abroad) the demand for new housing and associated facilities and services is growing.
- The population growth projections for the area see more growth in Wrexham than all other authorities in North Wales combined.
- There is a lack of housing supply, sites that can deliver housing in the next 5 years.
- Providing a supply of housing to meet the diverse needs of the population will be a challenge.

Topic Paper 8 – Infrastructure

- Infrastructure such as roads, GP surgeries, schools and open spaces are pressured by development, many of which may be overloaded by additional growth. Providing infrastructure in the right place at the right time to support development will be a challenge.

Topic Paper 9 – Climate Change and Energy

- Carbon emissions are falling in the County Borough but development may threaten this trend by increasing economic activity and vehicle movements.
- The per capita carbon emissions in the County Borough are significantly higher than the Welsh and UK averages; this figure is skewed by industrial outputs as Wrexham has a disproportionate amount of industry.
- Transport is a significant contributor to carbon emissions, particularly private cars.
- Renewable energy generation can contribute to a reduction in carbon emissions, there is a duty to support its development in the County Borough by finding the best locations and opportunities for it.

Topic Paper 10 - Transport

- Accessibility to employment, housing, and facilities is key for a sustainable community.
- Locating development in the most accessible places and improving access to such facilities from remote areas will be a challenge.

6.0 SA framework – task A4.

6.1 An 'SA framework' was developed to help identify the impacts of various parts of the LDP. The framework is basically a series of questions about the LDP's sustainability. The main questions are:

1. Will it strengthen the role of Wrexham as a key settlement of national importance?
2. Will it support a vibrant, diverse and competitive local economy?
3. Will it Regenerate Wrexham Town Centre?
4. Will it promote active travel, use of public transport and seek to alleviate known highway infrastructure capacity constraints?
5. Will it facilitate mixed diverse communities by delivering housing, including affordable homes?
6. Will it promote and encourage a healthy, active and safe lifestyle?
7. Will it conserve, enhance and promote local culture, character and distinctiveness?
8. Will infrastructure be available to support development?
9. Will it protect, manage and enhance the natural and historic environment and landscapes?
10. Will it reduce carbon emissions and maximise our resilience to and mitigate and adapt to the impact of climate change?
11. Will it ensure adequate protection and supply of high quality minerals?
12. Will it facilitate the management of waste in a sustainable way?

7.0 Consultation on the SA/SEA – Task A5.

7.1 A Scoping Report² with this information was sent out for consultation in March 2013. Five consultees made over 100 comments between them. The report was then updated in October 2014 to take these comments into account or justification given for why not.

7.2 At Vision, Objectives, Strategic Growth and Spatial Options Consultation³ no comments on the SA/SEA were made.

7.3 During consultation on the Preferred Strategy nine consultees responded and their comments were considered for changes in the emerging plan.

8.0 Testing the LDP objectives against the SA framework – task B1.

8.1 The LDP vision and objectives were tested against the SA framework and broadly found to have positive impacts. Some suggestions were made to further improve the objectives. Changes to guidance integrated LDP and SA objectives into one set of Integrated Objectives.

² <http://wrexhamldp.wrexham.gov.uk>

³ <http://wrexhamldp.wrexham.gov.uk>

9.0 Developing alternatives – task B2

9.1 Several strategic alternatives were considered for the LDP, and their impacts were identified using the SA framework.

9.2 Different levels of future growth;

- Option 1: 2014 based 5 year migration trend (Sept 2016), 6000 (plus slippage allowance) = 6600, 2700 jobs (19ha) employment growth;
- Option 2: 2014 based 10 year migration trend (Sept 2016), 7750 (plus slippage allowance) = 8525 4700 jobs (33ha)

9.3 No growth was dismissed as unreasonable because the County Borough's population is expected to rise, a variety of other population projections were rejected as being unsound.

9.4 Different broad locations for housing and employment development;

- Focus on Wrexham town
- Focus on Wrexham town and larger settlements in the County Borough
- Focus on Wrexham town and larger settlements with some smaller villages with facilities

9.5 A hybrid version of the third option was chosen, following this sustainability appraisal, as it spreads the benefits of growth throughout the County Borough and rural areas while offering greater flexibility to avoid harmful effects. Other spatial options avoiding impacts on infrastructure such as waste water and the A483 were dismissed as unrealistic.

9.6 Different specific sites for development;

- Strategic housing sites to the east (Cefn Road) and west (Lower Berse Farm) of Wrexham together with a site between Gwersyllt, Bradley and Rhosrobin
- An area of search for employment land to the north and south of Wrexham Industrial estate (WIE) and north of Wrexham.

9.7 The sites to the east and west of Wrexham were chosen as better able to deliver the necessary housing and associated community infrastructure and roads. The area of search for employment land to the north of WIE was best in meeting employment needs.

9.8 A number of options were considered but dismissed as unrealistic in light of the evidence and national policy.

10.0 Predicting and evaluating the impacts of the alternatives and draft LDP – task B3/B4

10.1 The impacts of all the alternatives and of each policy in the Deposit Plan were appraised using the SA framework. Table 3 shows what the overall impacts of the LDP would be, and Table 4 provides further details on these.

The following colour coding system is assessing the various policies against the SA framework.

✓✓	Very Positive Effects
✓	Positive Effects
✓x	Some aspects of the policy have positive effects and some negative
x	Negative Effects
xx	Very Negative Effects
?	Uncertain/Insignificant

Table 3: Impacts of the Deposit Plan

	1. Role of Wrexham	2. Economy	3. Wrexham Town Centre	4a. Active Travel	4b. Highways Capacity	5. a Mixed Community	5 b. Housing	6. Healthy Living	7b. Character & Welsh Language	8. Infrastructure	9a. Ecology & Habitats	9b. Natural Resources	9c. Historic Environment	9d. Landscape	10a. Carbon emissions	10b. Climate Change Resilience	11. Minerals	12. Waste
Vision	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Objectives	SA and LDP Objectives are Integrated																	
SP1; Housing Provision	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP2; Location of New Development	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP3: Key Strategic Sites (KSS)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP4: KSS1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP5: KSS2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP6: Planning Obligations	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP7: Green Wedge	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP8: Wrexham Town	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP9 Economic Growth, Employment and Enterprise	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP10: Wrexham Industrial Estate	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP11: KSS3 WIE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP12 Transport and Accessibility	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP13: Design Principles	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP14: Health & Wellbeing	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Overall sustainability impacts of the Deposit Plan: short, medium and long term impacts

SA Objective	Overall Impacts			
	S	M	L	
Objective 1: Ensuring that the role of Wrexham as a key settlement of national importance in the Wales Spatial Plan Wrexham – Deeside – Chester hub is strengthened;		✓	✓✓	<p>With the majority of growth in housing and employment focussed in Wrexham with the plan facilitating the delivery of necessary and enabling infrastructure to support growth in terms of highways/transport, education etc. the plan will have positive effects for this objective.</p> <p>The delivery of housing, take up of employment land, regeneration of Wrexham town centre, delivery of A483 Junction improvements and transport infrastructure will gain impact as the plan progresses with the greatest benefits accruing toward the plan end and beyond.</p>
Objective 2: Support a vibrant, diverse and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow in Wrexham town and Wrexham Industrial Estate;	✓	✓✓	✓✓	<p>The plan will deliver a platform for strong economic growth with provision for a strategic expansion to WIE while also safeguarding other regional and locally important employment estates and support for significant jobs growth. Other sectors such as retail, minerals, waste, tourism, renewables, rural and farming enterprises will also benefit from the plans policies.</p> <p>Supporting employment growth will be balanced growth in housing and the delivery of necessary and enabling infrastructure.</p>
Objective 3: Regenerate Wrexham Town Centre as a multifunctional destination for retail, education, civic, amenity, employment, leisure and residential uses;		✓	✓✓	<p>The retail strategy for the town focuses development to the retail hierarchy with Wrexham town centre sitting at the top. The LDP sets a framework to support regeneration of the town (Masterplan, Design Masterplan Framework) and transport infrastructure upgrades with which to bring about qualitative improvements in the town centre with enhanced connectivity.</p>
Objective 4a: Promote active travel and use of public transport by locating new development in the most sustainable locations, and seek to alleviate known highway infrastructure capacity constraints on the road network within the County Borough;	?	✓x	✓	<p>The plan locates development where the need to travel has been reduced and where sustainable travel can be supported. It provides transport infrastructure to support active and sustainable travel and it places active travel at the forefront of travel planning and designing developments.</p> <p>Traffic will increase as a result of growth, mitigation will be provided but this will not completely divert traffic onto public transport or into active travel. The best opportunities to influence travel behaviours will be with new development.</p> <p>The success of this will largely depend on the publics propensity to change travel behaviours, often factors outside of planning will have a bearing, however the LDP will encourage a shift from car movement to walking/cycling and use of public transport.</p>
Objective 4b: Promote active travel and use of public transport by locating new development in the most sustainable locations, and seek to alleviate known		x	x	<p>Growth will lead to additional traffic movements, the plan provides mitigation in the strategic transport policy, key strategic sites policies, planning obligations and design principles which will help keep highways operating within capacity but there are likely to be local impacts.</p> <p>WG plans for investment in the A483 junctions during the plan period will prevent highways capacity becoming a regional/national constraint. The strategic policies (SP4) are worded to keep impacts local (through</p>

<p>highway infrastructure capacity constraints on the road network within the County Borough;</p>				<p>phasing and timing of development).</p> <p>See active travel policy assessment for detailed mitigation to encourage active travel and sustainable transport.</p>
<p>Objective 5a: Facilitate mixed diverse communities by delivering housing, including affordable homes to meet the needs of the County Borough;</p>	✓	✓✓	✓✓	<p>Strategic policy SP1 delivers a significant quantity of market housing with potential to deliver affordable housing, addresses housing types and tenures and needs of the community.</p> <p>Development is located in the most viable areas to ensure that sites have development value to fund enabling and necessary infrastructure needed to support development.</p> <p>Policies for the location of development, Wrexham Town, key strategic sites, Transport promote accessibility to employment, services and facilities needed to support new housing.</p> <p>Policies for transport, planning obligations, green infrastructure, open spaces, climate change and design ensure that housing is supplied with the necessary infrastructure, connectivity and design to support communities.</p> <p>The wider needs of the community, G&T, rural communities, tenures etc. have been addressed.</p>
<p>Objective 5b: Facilitate mixed diverse communities by delivering housing, including affordable homes to meet the needs of the County Borough;</p>	✓	✓	✓✓	<p>The spatial distribution of housing helps meet needs throughout the County Borough. Due to viability, lack of constraint free sites and the distribution of housing needs it is not possible to perfectly match housing supply with affordable housing needs but the strategic and detailed policies make the best efforts to maximise affordable housing supply responsive to viability variances across the County Borough and the supply of housing.</p> <p>Strategic policy SP1 delivers a significant quantity of market housing with potential to deliver affordable housing, addresses housing types and tenures and needs of the community.</p>
<p>Objective 6: Promote and encourage a healthy, active and safe lifestyle;</p>	✓x	✓x	✓x	<p>The promotion of health and wellbeing is embedded in the LDP; the plan encourages healthy lifestyles especially active travel, addresses living and environmental conditions (new housing and community facilities), grows the economy and improves accessibility (transport and location of development) while providing infrastructure to support development and communities.</p> <p>Much will depend on the ability of the LDP to promote active lifestyles and facilitate/provide infrastructure (much of which is outside the control of planning) at the planning application stage. There will also be an increase in air pollution.</p>
<p>Objective 7: Conserve, enhance and promote the local culture, character and distinctiveness of Wrexham including the Welsh Language;</p>	✓x	✓x	✓x	<p>The locations for growth and its scale will place pressure on local character and culture, but the impact is dependent on site specifics and mitigation at the planning application stage.</p> <p>The approach to green wedge, natural and historic environment (AONB, World Heritage), SLA, green infrastructure, locally designated sites, trees and hedgerows will help protect and enhance international and nationally important assets while also protecting local character and settlements from coalescence. The design policy and green infrastructure policy will help protect and mitigate impacts locally but generally the outcomes for local character are uncertain until the detailed application is submitted.</p>

				<p>The needs of the Welsh Language community have been considered in the LDP with opportunities for windfall development and where appropriate mitigation to address negative impacts and provide positive support.</p>
<p>Objective 8 Ensure all development is supported by the necessary provision of, or improvements to infrastructure, services and facilities in an effective and timely manner to make development sustainable and minimise its effect upon existing communities.</p>	?	?	?	<p>Development will place pressure on existing infrastructure in particular education, open spaces, highways, waste water and health. Impacts of development on infrastructure are locational specific.</p> <p>Development is located in the most viable areas to ensure that sites have development value to fund enabling and necessary infrastructure needed to support development. Infrastructure necessary to deliver and enable the allocated sites has been identified and the phasing and timing of development is tied to the delivery of infrastructure. Policy hooks are in place to ensure that mitigation is available to deliver the infrastructure.</p> <p>However, there are challenges in providing all infrastructure associated with development, viability will vary site by site, some sites may not be able to fund all infrastructure and some infrastructure is delivered outside of the plan (particularly health and strategic transport). Infrastructure capacity will also vary during the plan period. The impact of these will be clear at detailed planning application stage. While the LDP has taken reasonable steps to deliver and co-ordinate delivery of infrastructure it cannot be certain what the outcome will be.</p> <p>Mitigation seeks to make the most efficient use of existing infrastructure in areas which can viably deliver infrastructure through planning obligations/CIL and mitigate impacts through policies for Infrastructure, Transport, Health and Wellbeing, Key Strategic sites, Design and waste. Policy safeguards are in place to ensure that infrastructure necessary to deliver and enable development is provided with sites at an appropriate time.</p> <p>There are several infrastructure types that are not funded through the planning system (e.g. health, utilities, water) the ability of these providers to keep up with demand will be outside the control of this plan.</p>
<p>Objective 9a: Protect, manage and enhance the natural and historic environment and landscapes;</p>	?	✓x	✓x	<p>Provides a strong steer to guide development away from the most sensitive ecological areas (Internationally and nationally designated sites) but growth will impact on local ecological features as a consequence of the levels of growth and the need for greenfield development. In particular the Key strategic sites and location of development could have negative effects on local features. Mitigation and avoidance measures are provided by policy SP13 Design and SP15 and detailed policies NE1-NE6.</p> <p>A strategic approach to ecological mitigation is provided around Wrexham and WIE relating to Great Crested Newts and in Rhos with Hafod SAC.</p>
<p>Objective 9b: Protect, manage and enhance the natural and historic environment and landscapes;</p>	x	x	xx	<p>The main negative effects would be caused by the policies that promote housing and economic growth which requires greenfield development. The location of growth in tiers 1-3, would lead to the loss of the best and most versatile agricultural land.</p> <p>A growing population and increased economic activity will increase transport related air pollution. Site specific impacts can be managed at the planning application stage but diffuse levels will increase.</p> <p>Site specific mitigation protecting wider natural resource issues provided by SP15 (Environment), SP13 (Design), SP17 (Minerals) and DM1, NE6. The strategy of locating growth in Wrexham and other sustainable settlements with good active travel/public transport potential allied with</p>

				<p>transport policies will help encourage active travel to reduce emissions. Sustainable transport measures need to be in place when developments are occupied.</p> <p>Water resources are given effective protection (NE6) and the plan supports the re-use of land with contamination. Few allocations are on brownfield land but a significant proportion of the housing and employment supply is brownfield.</p>
<p>Objective 9c: Protect, manage and enhance the natural and historic environment and landscapes;</p>	?	✓x	✓x	<p>Protection of historic and cultural heritage is embedded in the plans vision and the Historic environment policy (SP16) provides protection and enhancement for internationally, nationally important historic and cultural assets.</p> <p>The plans spatial strategy, housing allocations, mineral and renewable policies, in allowing greenfield development, will pressure heritage assets and potentially unknown features. SP16, the design policy SP13 and DM1 provides protection and mitigation but the outcomes are uncertain as much depends on site specifics and mitigation.</p> <p>Growth and regeneration will put development pressure on local assets particularly in Wrexham and town centre.</p>
<p>Objective 9d: Protect, manage and enhance the natural and historic environment and landscapes;</p>	?	✓x	x	<p>Provides a strong steer to guide development away from the most sensitive landscape areas (Internationally and nationally designated sites) and manage development within them. But growth will impact on local features as a consequence of the levels of growth and the need for greenfield development. In particular the Key strategic sites, spatial location of development, allocations, minerals and renewables policies could have negative effects on local features. Mitigation and avoidance measures are provided by policy SP4-5, SP7, Green Wedge, SP15 (Historic) and SP13 Design and detailed policies DM1, NE2, 3, 4, and 5, RE2. Over the course of the plan incremental cumulative impacts can erode local character dependent on the effectiveness</p> <p>Prior extraction of mineral resources (MW1) may conflict with landscape features of local value.</p>
<p>Objective 10a: Reduce carbon emissions and maximise our resilience to and mitigate and adapt to the impact of climate change</p>	✓x	✓x	✓x	<p>The growth agenda of the plan (housing and economy) will increase carbon emissions through economic activity and increased travel. But policies reinforcing the role of Wrexham and Wrexham town centre, the most sustainable location for development, offer opportunities to reduce these effects (resource efficiency, minimising travel, and opportunities to facilitate sustainable building standards) though there will still be an impact.</p> <p>The plan also promotes low carbon and renewable energy development through the detailed policies RE1 and RE2 with an energy opportunities plan (REA). The plan seeks to reduce the need to travel by locating development in the most sustainable locations with a range of services while promoting sustainable transport.</p> <p>Strategic policies for Transport, location for development, Key Strategic Sites, Design and Minerals provide the hooks by which avoidance and mitigation measures can be delivered and help reduce per capita emissions.</p> <p>The absolute levels of carbon will increase (as they would with a growing population) but the plan takes positive steps in reducing per capita emissions, hence an overall positive outcome for this objective.</p> <p>One of the biggest generators of emissions is space heating for homes</p>

				where the LDP (RE1) has the potential to improve energy performance in new build.
Objective 10b: Reduce carbon emissions and maximise our resilience to and mitigate and adapt to the impact of climate change	✓	✓	✓	<p>Strategic policy 19 and SP20 ensures development delivers this objective.</p> <p>The plan protects and enhances the natural environment, green infrastructure, open spaces and natural resources that have important roles in climate change resilience. SP19, SP20, DM1 and the Design policy SP13 ensure that these issues are addressed through the planning application stage with planning obligations mitigation in place to address issues.</p> <p>The majority of the spatial areas for development avoid areas at risk of flooding but there are some locations that require further avoidance and mitigation at site level, particularly with regards to surface water. Surface water flood risk occurs in specific sites and the loss of greenfields may impact on capacity to deal with flood events and cause flooding elsewhere but in principle all known flooding issues can be resolved at planning application stage.</p>
Objective 11: Ensure development meets the needs of society and industry, now and in the future, through ensuring adequate protection and supply of high quality minerals;	✓x	✓x	✓x	<p>On balance the LDP plans effectively for minerals by safeguarding resources and ensuring a long term supply, it manages conflicts between minerals and development that could conflict by using mineral buffer zones and mineral extraction exclusion areas.</p> <p>However, the scale and location for development (KSS's, policy SP2 and H1) creates internal conflicts with the minerals approach. These policies will lead to development on greenfield sites which often have mineral resources. Policies SP17 and MW1-4 provides mitigation in promoting prior extraction and protecting/supplying mineral resources but will be limited in the amount of practical extraction. Safeguards are in place to ensure that where possible prior extraction can occur and impacts are minimised.</p> <p>Protection of the natural environment conflicts with the supply of mineral resources though the most sensitive resources are protected limiting impacts to the potential loss of local features.</p>
Objective 12: Facilitate the provision of an integrated network of waste facilities which enable waste to be managed in a sustainable way.	?	✓	✓✓	<p>Absolute levels of waste will increase but the requirement to consider sustainable waste management will help reduce arisings. The approach of the plan gives reasonable confidence that per capita waste can fall.</p>

11.0 Considering ways of mitigating adverse effects – Task B5.

11.1 The planning policy team have been very open and responsive to the SA process, and the SA has resulted in many changes to the LDP which will help improve the sustainability of its outcomes:

- Rewording of several LDP integrated objectives, this improved flood resilience and recognised the importance of climate change; enhanced protection for landscapes; promoted public transport and help ensure community facilities and roads are provided;
- Revised the locations for growth to give greater flexibility to avoid natural environment effects and help deliver more viable development;
- Choose the most sustainable key strategic sites and employment land area of search;
- Amendments to policies; greater emphasis in the strategic policies to encourage walking, cycling and public transport; ensure that the environment is well protected; steer development to settlements in close proximity to Wrexham town; and
- Identified effects from the detailed policies that were mitigated or avoided by changes in policy wording or insertion of policies. Changes include avoiding a conflict between regeneration of the Flexsys site and environmental protection measures, greater emphasis on active travel for transport, closing a loophole that could allow developers to provide infrastructure and more explicit support for local scale renewable energy.

12.0 Proposing monitoring measures – task B6.

12.1 Once the LDP is adopted, its actual impacts will be monitored to make sure that unexpected effects are identified and dealt with. Much monitoring is already carried out for other purposes, for instance traffic counts for transport planning. This can also be used to monitor the effects of the LDP. However some new monitoring is proposed here that would measure important sustainability aspects of the LDP.

13.0 How to comment on the SA Report

The SA Report is available for public consultation alongside the Deposit LDP for a 7 week period

The easiest and most efficient way to view the Deposit Plan and associated evidence base is to submit any comments you have via the Local Development Plan (LDP) Consultation Portal which can be found here www.wrexham.gov.uk/ldp . Here you can view and comment as you read or alternatively you can download PDF versions of the Deposit Plan and all relevant accompanying documents. A step-by-step guide on how to submit comments on the portal is also available via the link above.

The consultation is open for 7 weeks from 9 April 2018 – 31 May 2018. All comments must be received by 5.00pm on 31 May 2018. Those received after the deadline will not be considered.

If you need any further information please contact the Planning Policy Team at planning_policy@wrexham.gov.uk

Once the LDP is adopted, Wrexham County Borough Council will publish an ‘SEA Statement’ which explains how the sustainability appraisal influenced the LDP.