

WREXHAM COUNTY BOROUGH

# Local Development Plan 2006 - 2021

Non Technical Summary of  
the Sustainability Report  
(including the Environmental Report  
required under the SEA Directive)  
**June 2010**



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## **Section 1**

### **1.0 Introduction**

**1.1** European Directive 2001/42/EC provides for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation of plans and programmes with a view to sustainable development, by ensuring that an environmental assessment is carried out of plans likely to have significant effects on the environment.

**1.2** This report provides a non-technical summary of how this Directive has been addressed in the production of the LDP. Section 2 outlines the framework known as Strategic Environmental Assessment (SEA) and the wider Sustainability Appraisal (SA) that guides the assessment of plans and programmes in accordance with the Directive. Section 3 details the content, main objectives and relationship of the Wrexham County Borough Local Development Plan with other relevant plans. Section 4 documents the appraisal process to date with details of the framework and environmental objectives used to assess the LDP; information on the relevant aspects of the current state of the environment and the likely evolution thereof without the plan; details of the environmental characteristics of areas likely to be affected and details of existing environmental problems especially regarding European designated sites. Section 5 details the findings of the SA appraisal, likely significant effects on the environment from the plan, measures to prevent, reduce or offset significant effects, details of alternatives dealt with, monitoring and problems encountered.

### **2.0 Section 2**

#### **2.1 Sustainability Appraisal**

Guidance from the Welsh Assembly Government in 2005<sup>1</sup> has been to incorporate the requirements of SEA (Directive 2001/42/EC) into a wider SA process that looks at economic and social effects alongside environmental effects. The combined SEA/SA process is referred to in this document as 'Sustainability Appraisal' or SA, and follows a five stage approach.

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 Sustainability Appraisal report

Stage D - Consulting on the draft plan and the Sustainability Appraisal report

Stage E - Monitoring the significant effects of implementing the Plan on the environment

We are at stage D.

**2.2** The combined sustainability appraisal and strategic environmental assessment of the Wrexham County Borough Council LDP consists of four parts:

- This Non Technical Summary, providing an accessible explanation of the process and the key sustainability messages that have emerged throughout the process.
- The full Environmental Report, a complete description of the process of sustainability appraisal that has accompanied and informed each stage of the Plan making process
- Appraisal Matrices of Strategic Policies, individual sustainability assessment of each policy

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<sup>1</sup> A Practical Guide to the Strategic Environmental Assessment Directive (ODPM)

- against the framework objectives established in the Scoping Report.
- Appraisal Matrices of Specific Policies, individual sustainability assessment of each policy against the framework objectives established by the Scoping Report.

**2.3** Dr Steven Smith, Environmental Consultant at Scott Wilson, has externally verified the Sustainability Appraisal that has been produced at each stage iteration of the Deposit Plan in order to ensure that the process has been robust and challenging, as well as providing guidance and best practice advice throughout the process.

### **3.0 Section 3**

#### **Wrexham County Borough Council Local Development Plan**

**3.1** The Local Development Plan sets out the framework for future development across the County Borough until 2021 and once adopted, will replace the existing unitary development plan. It will also provide guidance for partners, developers and the wider public and assist in the determination of future planning applications.

**3.2** The Planning and Compulsory Purchase Act 2004 requires the Council to prepare a Local Development Plan setting out its objectives for the development and use of land in Wrexham County Borough for the period to 2021, and the policies needed to implement them.

**3.3** The 2004 Act requires the Council, in preparing the LDP, to have regard to

- A wide range of legislation, policies and other initiatives, at European, national and local levels of government e.g. national planning policy and the Wales Spatial Plan;
- Relevant social, economic and environmental considerations;
- The Council's own Community Strategy; and
- The resources likely to be available for implementing the plan.

**3.4** The LDP process to date has the following key stages, Delivery Agreement, Key Issues and Options, Preferred Strategy and Deposit Plan. This summary relates to the stages to date and in particular the Deposit Plan.

#### **3.5 Summary of the Contents of the Local Deposit Plan**

**3.6 Plan Strategy.** The strategy maximises the use of previously developed, under-used or vacant land within existing settlement limits, focuses development in Wrexham to enhance its sub regional status and directs development towards western villages currently experiencing social, economic and physical decay, restricts development within other settlements mainly in rural areas which do not possess a range of key facilities, provides an appropriate level of housing and strategically placed employment land, directs retail development to Wrexham town centre, prevents coalescence of settlements and protects areas of landscape and nature conservation interest.

#### **3.7**

**Chapter 1:** The plan area, purpose, structure and process.

**Chapter 2:** The national, regional and local strategic policy context to which the Plan is aligned.

**Chapter 3:** Key local social, economic and environmental issues and challenges identified from the evidence base.

**Chapter 4:** The plan's vision with accompanying objectives of how the County Borough should develop in the future, which is cross-referenced to plan policies (see below for details of the objectives).

**Chapter 5:** A strategy which outlines the broad intention for development and strategic policies which together provide a framework for more specific policies and indicate the provision of housing, employment and other major land uses, the broad locations where such development is directed and the areas subject to protection from development.

**Chapter 6:** Specific policies, designed to deliver the strategy, which set out employment and housing allocations, specify general criteria against which planning applications for the development and use of land and buildings will be considered or provide detailed guidance for appropriate change in the use of land and buildings and protection to ensure that development is in accordance with the Plan's vision and objectives.

**Chapter 7:** Monitoring and implementation which includes a list of key targets and details how the Plan's performance will be monitored. The plans evidence base, the review of national, regional and local policy together with pre-deposit consultation during the stages mentioned above raised issues and challenges for the county borough and led to the creation of a vision and objectives, plan strategy and policies to enable the strategy.

## **4.0 Section 4 Sustainability Appraisal**

### **4.1 The story so far**

**4.2** A sustainability appraisal has been carried out at every stage of the Local Development Plan by Wrexham County Borough Council's Sustainability Officer, in close cooperation with the planning officers who have prepared the LDP.

A Scoping Report was published in October 2006, setting out the policy context, evidence base and scope for the SA. The sustainability objectives listed below were developed and finalised in workshops with a wide range of stakeholders and the Responsible Bodies<sup>2</sup>, and have been used consistently as the basis for appraising each stage of the Deposit Plan's development. These objectives form the basis for assessing and comparing the sustainability implications of the emerging plan. The full Sustainability Report contains the range of questions asked of each growth and spatial option against each sustainability objective, and the same range of questions is asked of each option for consistency in order to test how that option will contribute to the overall objectives of the Local Development.

<b>Ref.</b>	<b>Objective</b>
	Social
SO1	To raise levels of employability and meet skills needs
SO2	To develop and support/ maintain social and physical environments that create the necessary conditions to protect, promote and support health and well being
SO3	To provide a framework so our children and young people can have high aspirations and realise their dreams
SO4	To promote community viability and cohesion and access to essential services

<sup>2</sup> Cadw, Countryside Council for Wales, Environment Agency Wales

SO5	To reduce crime, fear of crime and anti-social behaviour
	Economic
EC1	To attract and promote investment and to support business in order to create and safeguard jobs
EC2	To create and support the provision of informal and formal learning opportunities to help local people participate in all aspects of economic life
EC3	To improve the quality of life for local people by improving the quality and diversity of the built and natural environment in which they work, live and play
EC4	To engage local people in the regeneration of their communities through the provision of appropriate support in order to overcome barriers to employment and to take advantage of economic opportunities
	Environmental
EN1	To ensure that the local environment supports the largest possible range of native animals and plants, and it is supported by sustainable agricultural and forestry land use
EN2	To make careful use of resources, encourage recycling with minimal amounts of unnecessary waste and as little pollution as possible
EN3	Preserve and enhance landscape character, SAMS, archaeological sites, listed buildings and other culturally important features
EN4	To provide an efficient and integrated transport system that promotes walking, cycling and public transport
EN5	To minimise energy use and increase the proportion of energy both purchased and generated from renewable and sustainable sources
EN6	To develop towns, villages and buildings which respect social, environmental and cultural needs and enhance local character

**4.4** In November 2006, the Council developed Key Issues and Options for the LDP. These were appraised against the sustainability objectives (above) from the Scoping Report, adding to the evidence base, and suggesting alternative development proposals and possible mitigation measures which were refined into a Preferred Strategy for the future development of the County Borough.

**4.5** The Preferred Strategy was appraised against the above sustainability objectives in order to consider the environmental effects of the strategy.

**4.6** A Health Impact Assessment and Habitats Regulations Assessment Screening were also carried out at Preferred Strategy stage. This highlighted a wide range of issues, which combined with the sustainability appraisal to inform the emerging Deposit Plan.

**4.7** **The Deposit Plan** emerged from the Preferred Strategy with detailed policies, sites and allocations to implement the strategy, these are listed in Appendix 1.

**4.8** **Deposit Plan – strategic policies.** The Appraisal Matrices of the Strategic Policies contained within the Deposit Plan have been published as a separate appendix to accompany the Environmental Report. These matrices are an individual sustainability assessment of each policy against the framework objectives established in the Scoping Report.

**4.9** **Deposit Plan – specific policies.** The Appraisal Matrices of the Specific Policies contained within the Deposit Plan have been published as a separate appendix to accompany the Environmental Report. These matrices are an individual sustainability assessment of each policy

against the framework objectives established in the Scoping Report.

#### **4.10 Existing Environmental Baseline**

**4.11** An environmental baseline provides the basis for predicting and monitoring environmental effects and helps identify environmental problems and alternative ways of dealing with them. The baseline has helped in the development of SEA objectives and to inform the objectives of the LDP. The Environment Report contains most of this data supplemented by the Scoping Report and Habitats Regulations Assessment.

**4.12** The County Borough has a varied historical landscape and natural environment which supports a rich variety of habitats, some of which are nationally rare (e.g. lowland peat bog, upland moors). There are 17 sites of special scientific interest. About 15,000 ha, covering 31% of the County Borough, are a potential UK biodiversity priority habitat under the Habitats Directive (including Special Areas of Conservation and Special Protection Areas selected for birds under the Birds Directive). However, the detrimental impact of intensive farming (which covers 60% of the County Borough) and development (which covers 11% of the County Borough) has resulted in significant losses and fragmentation of habitats. In contrast, the County Borough has a legacy of land contamination resulting from previous heavy industrial uses (e.g. coal mining, steel making, tanning, etc) and more recent industries (e.g. munitions, chemical works).

**4.13** The County Borough has a varied landform ranging from the Berwyn Mountains in the south-west to the low flat floodplain of the river Dee in the north-east. The County Borough contains 22 conservation areas, over 900 listed buildings of historic or architectural interest, a World Heritage Site and 125 scheduled ancient monuments. The upland area (Berwyn Mountain/ Ceiriog Valley and Ruabon/Esclusham Mountain) has potential for AONB status.

#### **4.14 What would be the situation without the plan?**

**4.15** The baseline information contained within the Scoping Report (2006) evaluates the current state of the County Borough in terms of social, economic, and environmental indicators but also includes a substantial amount of trend data, and projecting this data forward gives an indication of the likely future without the plan.

**4.16** Predicting future trends is fraught with difficulty dependent as they are on a wide range of unknown factors that affects to varying levels the international, national, regional and local political, social, economic, technological, environmental situations.

**4.17** The WCBC Plan team worked with Forum for the Future to identify potential future drivers of change, around a wide number of areas from population growth to the impact of climate change. These future drivers of change are fully outlined in the main Sustainability Report, but the key messages were:

- A wide range of environmental factors (soil, fauna, flora and biodiversity) will continue to be under pressure from the way land is managed/operated, and this includes European designated wildlife sites.
- Uncontrolled housing growth and development could lead to pressures on water quality and water resources and could lead to additional storm water discharges and surface water run-off from roads, driveways and contaminated land.

- Within the context of an aging population, there will be a continued growth in household formation placing demands on land, natural resources and affordable housing, this demand needs to be met whilst ensuring continued environmental protection of the Borough's green spaces.
- Inward migration and international migration will continue to increase future demand for housing and services, and may impact on the Welsh language. The migration of young people away from rural areas could lead to an increasingly ageing population in rural areas.
- There will be a rise in single parent, one person, multi-person households requiring more housing and innovative, flexible housing design
- The instability of energy supplies, the rising cost of oil, and the likelihood of hitting Peak Oil within the next ten years will mean that houses of the future will look to generate their own power e.g. through solar panels. There will also be growth in high tech low carbon industries to support the Welsh Assembly Government's Green Jobs Strategy
- There will continue to be an increasingly diverse workforce and workplace, meaning changes in traditional patterns of living and employment through teleworking, home working and a need for flexible home design (live-work units, flexible lifelong designs etc). ICT developments supporting the rural economy through the use of internet hubs in villages and dispersed communities
- Climate change is likely to have significant impacts on the County Borough with forecasts of wetter warmer winters and hotter drier summers. This will impact on water resources (increased demand and reduced supply), flooding (river and flash floods), ecology (changing agriculture, biodiversity), historic environment (flood danger, impact on the preservation of remains), health (reduce cold related deaths but increase heat related deaths and a change in disease patterns). Designated environment sites will be at risk (e.g. River Dee SSSI, Berwyn blanket bog, low land bogs such as Fenn's Whixall).

#### **4.18 Environmental Characteristics of Areas Likely to be Affected**

**4.19** This sub-section provides a summary of the environmental/sustainability characteristics of areas likely to be affected by the plan and of European designated sites. Most of the County Borough's existing housing and employment development is located within Wrexham, Wrexham Industrial Estate and the Western Villages.

**4.20 Wrexham and Wrexham Industrial Estate.** The Deposit Plan seeks to maximise the use of previously developed, under-used or vacant land, for which there is an adequate identified supply, which would minimise the amount of greenfield land lost to development. Areas of environmental protection are not threatened by this approach. It maximises the potential for employment generation in Wrexham town centre, a key economic driver for the sub-region. The strategy meets local housing demand, supports local shops and community facilities and provides a wider variety of development to meet the needs of different market sectors.

**4.21 Western Villages.** These villages contain pockets of social and economic deprivation and physical decay and would benefit from sustained regeneration. Many of them are separated by narrow areas of open countryside, which are often under pressure for development, and the Plan contains policies to protect these Green Barriers, directing land for development to within existing settlement limits.

**4.22 Rural areas.** Growth in these settlements, generally not well served by public transport, would lead to environmental and social capacity being detrimentally affected and significant increases unsustainable commuting patterns to work and leisure by private car with resulting increases in energy consumption and emissions. New infrastructure requirements would be spread over more locations with extra pressure on public and private finances. Given the lack of previously developed, under-used or vacant land within these settlements there would be significant losses of greenfield sites, mostly on quality agricultural land and special landscape areas, to satisfy future growth requirements. It would be more difficult to achieve sustainable mixed use development and the level of developer contributions for infrastructure and community facilities (e.g. affordable housing, public open space, transport improvements, etc.) would be much reduced.

**4.23 European Designated Sites.** There are a number of sites in the county borough, these are Berwyn SPA, Berwyn and South Clwyd Mountains SAC, River Dee and Bala Lake SAC, Johnstown Newt Sites SAC, Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SAC Midlands Meres and Mosses (Phase 2) Ramsar site. The qualifying features for these sites are specific to each but encompass qualifying Habitats and Species as defined under the Habitats Regulations. The issues affecting these sites largely cannot be controlled by the planning system and are wide ranging including: land uses outside of planning control e.g. farming, waste water treatment, water quality from diffuse pollution sources, nutrient enrichment of water supply (e.g. from farming), airborne pollution from diffuse sources, water abstraction and invasive species.

## **5.0 Section 5 Appraisal Findings**

### **5.1 Findings**

**5.2** The Deposit Plan in itself will not be able to deliver sustainable development. It will not be able to integrate competing economic, environmental and social issues, but will establish a framework for directing future development, enabling each of the components that make up the new sustainable Community Strategy to be delivered.

**5.3** The main area of conflict between the Sustainability objectives and the growth and spatial options proposed for the County Borough was those options which will encourage development, whilst meeting the social and economic sustainability objectives may conflict with those that seek to promote or maintain the natural, historic and built environment.

**5.4** This conflict must be taken into account in developing the growth and spatial options, and placing development needs against conservation priorities on a site by site basis.

**5.5** The assessment concluded that there are no significant effects alone or in combination on any of the European Designated sites.

**5.6** The Deposit Plan must avoid any possible infrastructure lag where new housing developments are built prior to the construction of the roads, shops, schools, and health facilities necessary for sustainable communities to grow.

**5.7** The Plan should contribute to high levels of future environmental protection for the County Borough by ensuring that future development is focused towards Brownfield sites or other urban sites of low environmental quality.

**5.8** The natural environment of the County Borough receives high levels of protection in the Plan, and the spatial strategy will protect the greenbelt and enable the development of green corridors for use by residents of the County Borough as well as promoting biodiversity. An appraisal of the plan under the Habitats Regulations Assessment process confirmed there are no significant effects on designated protected sites (SAC, SPA or Ramsar).

**5.9** The Plan will need to spread the effects of growth according to the spatial strategy to ensure that medium and high levels of growth do not have an adverse impact on existing local identity, or put pressure on local services.

**5.10** The SA recognises the positive potential in the Plan for new housing development to improve the existing built environment, helping to generate capacity which will lead to sustainable communities, but this cannot be at the expense of allowing settlements to merge into each other and lose their local distinctiveness.

**5.11** The SA strongly recommends the need to bolster the sustainable design and construction policy through strong supplementary planning guidance, so that we can move towards a low carbon future, reducing energy use and unnecessary travel through car use across the County Borough.

**5.12** To create sustainable communities across the County Borough there is a clear need to support rural communities with the provision of affordable housing and employment opportunities. This will help to protect rural communities, reduce car use and tackle hidden deprivation.

**5.13** In order to tackle future environmental, social and economic challenges to the County Borough such as climate change, securing energy supplies, developing food security, accommodating population movements and improving public transport networks the impact of surrounding areas and their plans must be calculated and reflected in the Deposit Plan.

**5.14 Measures to prevent, reduce or offset significant effects, details of alternatives dealt with.**

**5.15** The key issues and options stage of the LDP provided a key opportunity to assess the key strategic alternatives, a number of housing/employment growth options were considered with a number of spatial distributions for the growth.

**5.16** As an iterative process the policies and sites have been subject to ongoing appraisal which has fine tuned the final deposit plan, amending, deleting or adding policies as appropriate to reduce, prevent or mitigate effects.

**5.17 Difficulties Encountered**

**5.18** The Development Plan and SA appraisal process front loads the research and evidence base into the early stages of the plan. Consequently there is a risk that new emerging evidence or policy could have significant impacts on the issues and objectives of the plan or appraisal.

**5.19** There are a number of indicators that could identify trends but are currently unavailable due to a lack of data.

**5.20** A key difficulty related to the need to predict and evaluate effects even where there was uncertainty regarding how these strategic policies will be implemented on the ground, or where there are gaps in evidence base.

**5.21** A key difficulty in carrying out the appraisal of the Deposit Plan was the strategic nature of the document and the tension between the scale of the ambition in the vision and its strategic objectives, and the degree to which this vision would be realised on the ground.

**5.22 Monitoring of significant effects**

**5.23** The Local Development Plan for Wrexham will be placed on deposit during Summer 2010, and undergo a further round of public and stakeholder consultation.

**5.24** This will be the opportunity to identify and refine what measures it is envisaged will require monitoring as a consequence of being identified as significant throughout the process of sustainability appraisal.

**5.25** The monitoring measures that are developed will be informed by the evidence baseline and the future trends that have informed the development of the LDP.

**5.26** The Sustainability Appraisal may then identify significant effects for which appropriate indicators can be monitored through the Deposit Plan's annual monitoring process.

**5.27** The current Annual Monitoring Report of the Unitary Development Plan includes a range of indicators under the headings of Housing, Employment, Environment, Shopping, Public Open Space, Transport, Waste and Minerals. These will assist in keeping the evidence base up to date during the interim period before the new monitoring arrangements are in place.

## Appendix 1

<b>Strategic Policies</b>
SP1: General Design Principles
SP2: Broad Location of Development
SP3: Provision of new homes
SP4: Affordable Housing
SP5: Protecting Existing Employment Areas
SP6 Provision of Employment Land
SP7: Shopping, Commercial office and indoor leisure facilities
SP8 Improving Travel
SP9 Development Proposals and Transport
SP10 Protecting and Enhancing the Natural Environment
SP11 Protecting and Enhancing the Historic Built Environment
SP12 Safeguarding mineral resources
SP13 Waste Disposal
SP14 Green Barriers

<b>Specific Policies</b>
A: Living in the County Borough
Policy 1: Housing Land Allocations
Policy 2: Mixed Use Regeneration Opportunities
Policy 3: Affordable Housing
Policy 4: Affordable Housing Exception Sites in the Western and Rural Villages
Policy 5: 100% Affordable Housing Sites
Policy 6: Windfall and Infill Housing Sites
Policy 7: Housing in the Countryside
Policy 8: Sub-division of Dwellings
Policy 9: Extra Care Housing
Policy 10: Gypsy and Traveller Accommodation
Policy 11: Welsh Language and Welsh Communities
B. Community Facilities
Policy 12: Community facilities provision
Policy 13: Community infrastructure
Policy 14: Protection of existing public open space
C. Developing the economy
Policy 17: Employment land allocations
Policy 18: High quality sites for manufacturing/office/research use
Policy 19: Rural economic development
Policy 20: Visitor accommodation outside settlement limits
D. Shopping, Civic and Leisure Facilities
Policy 21: Wrexham Town Centre: principal shopping streets
Policy 22: Wrexham Town Centre: non-principal shopping uses
Policy 23: Wrexham Town Centre: education, office and leisure zones
Policy 24: District shopping and commercial centres
Policy 25: New convenience goods shopping provision
Policy 26: Retail sales outside settlement limits

Policy 27: Local need shopping and the loss of local facilities
E. Improving Travel
Policy 28: Primary and core road network
Policy 29: Local road network management improvements
Policy 30: Public transport
Policy 31: Traffic management and parking
Policy 32: Walking and cycling routes
F. Protecting and Enhancing the Environment
Policy 33: Special Landscape Areas
Policy 34: Pentre Maelor housing
Policy 35: Pontcysyllte Aqueduct and Canal World Heritage Site
Policy 36: Water Discharging into the River Dee and its tributaries
Policy 37: Stand alone renewable energy generation
Policy 38: Minerals extraction
Policy 39: Minerals buffer zones
Policy 40: Inactive minerals sites
Policy 41: Restoration of mineral working sites
Policy 42: Reworking mineral waste
Policy 43: Flood risk
Policy 44: Derelict land
Policy 45: Design principles
Policy 46: Major transport corridors and gateways
Policy 47: Public art
Policy 48: Control of outdoor advertisements