Reconsideration of the SA and HRA

Introduction

The LDP Manual (Edition 2 August 2015) requires Authorities who are undertaking a review of their LDP’s to reconsider the Sustainability Appraisal. This reconsideration needs to be carried out alongside the drafting of the review report. This is before the drafting of more formal changes to the LDP. The manual outlines what is required as part of the review and these steps have been outlined below:

- considering the conclusions of the Annual Monitoring of the SA framework including monitoring whether there are significant effects of implementing the development plan
- reviewing the SA scoping and assessment framework of the existing Eryri Local Development Plan
  - SA Scoping - PPP and baseline information
  - consider the main changes nationally and locally since the adoption of the LDP
  - considering the SA objectives in light of what changes are proposed in the LDP revision.
- A refresh of the existing Eryri Local Development Plan HRA and consider the requirements in terms of HRA in light of possible changes proposed

Conclusions from the Annual Monitoring of the SA Framework

As part of the Annual Monitoring Report the outcomes of the development proposals permitted during the year and other evidence base information are assessed against the Sustainability Appraisal framework in order to ensure that the Local Development Plan is delivering the SA objectives.

While some of the monitoring indicators and data sources have been hard to find, the Authority has ensured that all of the SA objectives have been monitored effectively. This has ensured that the LDP is delivering in line with the SA framework set out at the start of the LDP process. The applications determined during the year have been assessed against the SA framework and analysed. Areas where the Authority does not collect the relevant information have been highlighted and these have been resolved where possible. For example the Authority was not collecting information regarding number of applications in flood risk which were contrary to NRW advice. The information is now required by the Welsh Government and a mechanism for collecting the data has been introduced. Other information required for the SA Monitoring framework is from the Census and has not yet been made available at National Park level e.g. data sets on journey to work and distance travelled.

Some of the monitoring indicators have data sources which are not updated on an annual basis and as the purpose of the monitoring framework is to review changes from year to year, these are not particularly useful. The indicators have been retained as they set a baseline and the Authority continues to look for other data sources which could help to inform the monitoring indicators. Furthermore the Authority will continue to monitor the effectiveness and relevance of the other monitoring indicators and the data sources which support the indicators.

As part of the LDP revision, the SA monitoring framework will be continually reviewed and new indicators may be introduced to replace ones where the information is not collected or is not providing useful information to ensure the SA objectives are being met.
The Annual Monitoring of the SA framework concludes that the LDP is delivering in terms of sustainable development in line with the SA objectives. No developments have been granted which have undermined the objectives set out as part of the LDP process.

Review of the SA scoping and SA framework

The SA objectives were drafted in line with Local Government Guidance and using the SEA Directive topics. The issues and opportunities identified through the baseline data collection and a review of the key international, national, regional and local planning documents were used to inform the drafting of the objectives. The plans policies and programmes reviewed as part of the scoping report have been reviewed again as part of this process.

Plans, Policies and Programmes

As part of reconsidering the SA/SEA scoping report it is important to update the review of the ‘plans, policies and programmes’ to ensure that any revised or newly published plans are considered in full. A list of the new or revised plans, policies and programmes which have been considered are outlined below.

International
The Paris Agreement

National
Housing (Wales) Act
Welsh housing quality standard revised guidance
Welsh Biodiversity Framework
Environment Act 1995
The Natural Environment and Rural Communities (NERC) Act (2006)
Well being of Future Generations (Wales) Act
Coastal Tourism Strategy
Sustainable Tourism Strategy
Environment Wales Act 2016
Woodlands for Wales
Climate Change Strategy for Wales
Preparing for a changing climate: Parts 1-5
Energy Wales: A Low Carbon Transition
National Strategy for Flood and Coastal Erosion Risk Management in Wales
Groundwater Protection: Principles and Practice
One Wales:One Planet
Historic Environment (Wales) Act 2016
Flood and Water management Act 2010
Dwr Cymru Surface Water Management Strategy
Planning (Wales) Bill
Planning Policy Wales
Climate Change Act

Local
Western Wales River Basin Management Plan Western Wales River Basin Management Plan
Dee River Basin Management Plan
Mid Wales Joint Local Transport Plan 2015 – 2020
Draft North Wales Joint Local Transport Plan 2015 - 2020 Consultation
Baseline Information

The State of the Park Report (SOPR) was used as baseline information in the original scoping report. The SOPR has been recently revised (November 2015). The information has been updated (where available) and new and additional data which may not have been available previously has been included. The report provides baseline data to assist in monitoring and reconsidering the SA as part of the review process. The SoPR contains information on all of the issues required by the SEA directive and is supported by the background papers. The SoPR contains information on:

- Landscape
- Flora and Fauna
- Biodiversity
- Climate change
- Humans health
- Water
- Soil
- Population
- Air
- Cultural heritage
- Material Assets

When the state of the Natural Resources Report (SoNaRR) is published in September 2016 by Natural Resources Wales this will provide further evidence on the state of natural resources within the National Park.

The SA objectives have been reconsidered in light of all of the above changes and the monitoring of the SA framework since adoption. It is considered that the SA objectives all remain relevant to the Local Development Plan and no changes are considered necessary. The SA framework which has been used throughout as a tool for assessing the sustainability of the LDP is still considered to be appropriate going forward.

Local Influences since the adoption of the LDP

The Authority has developed a number of SPG’s which support the Local Development Plan objectives and the Sustainability Appraisal Objectives.

The Snowdonia Enterprise zone (EZ) has been identified by the Welsh Government. The EZ has two sites, one is the former nuclear power station at Trawsfynydd and the other is the Llanbedr Airfield. Both lie at the centre of the National Park. The vision for the enterprise zone is two-fold, at Trawsfynydd the site is to become a hub for innovative low carbon technology enterprises and associated Research & Development uses. The site at Llanbedr will be for the Remotely Piloted Aircraft Systems (RPAS) sector, it is envisaged that there will be the potential for local businesses expanding or companies moving into Wales from the international RPAS and broader sectors. Furthermore it is hoped that the EZ will allow for the development of key engineering skills.
Locating these zones within a protected area such as the National Park has issues, such as the location compared to major transport routes around the country, impacts any developments such as RPAS could have on air quality, biodiversity and tranquillity. On the other hand the development could result in new employment opportunities and result in the creation of good transport links which could support the local economy, these issues will be taken into consideration when preparing the ELDP revision and considered further as part of the SA process once policies have been drafted.

Further information has been outlined below but any new policy as a result of the allocation of these new Enterprise Zones will be assessed against the SA objectives. It is considered that the SA objectives in place already will ensure that any potential policy will have taken into account, the environment, economic and social aspects of sustainable development. Some additional guide questions may need to be considered as a result of the Snowdonia Enterprise designation by the Welsh Government. These guide questions assist when considering the likely impacts of a policy on the achievement of an objective.

Reconsideration of the SA in light of proposed changes

The changes proposed as part of the review report have been considered against the existing SA objectives and are outlined below.

- To roll forward the end date of the ELDP to 2031 – The SA has been considered and the existing SA objectives are still considered relevant should the time be extended.

- New allocations, revisions of housing development boundaries and the contribution from windfall sites, this may have a small impact on the distribution of housing – the existing SA objectives are still considered relevant. There is a SA objective to provide housing to meet local need and the revised plan will continue to do this. Any new allocations or changes to housing development boundaries will be done based on need identified through the evidence gathered. It is unlikely that the housing distribution will change significantly and will be based on sound evidence and will still deliver the existing SA objectives.

- Recognise the Dark Sky Reserve – there is a SA objective which includes protecting and enhancing the landscape character and quality. The designation of the National Park as dark skies reserve reinforces this objective and the monitoring of the dark skies reserve and new lighting within the National Park will be added to the SA framework going forward.

- Amend the existing housing policies and associated text – the housing policies will be amended in line with evidence gathered, any amendment will only be to ensure that the policy still continues to meet the local need identified for the National Park. Any new/amended policy will be assessed against the SA objectives, specifically SA objective to provide housing to meet local need.

- Introduce a new policy to manage new development within the Snowdonia Enterprise Zone – as has been outlined above, there are a number of considerations surrounding the allocation of the EZ. These considerations will be assessed against a number of the objectives in the SA framework including:
  - Promote the use of sustainable transport modes and reduce the impact of cars, road freight and infrastructure
- Protect and enhance landscape character and quality
- Conserve, promote and enhance Snowdonia’s cultural heritage and Welsh language
- To promote good transport links to support the local economy
- To aid the creation of local employment opportunities and businesses related to National Park Purposes.

All of the above objectives will be used to assess any new policy proposed; this will ensure that all of the sustainability considerations have been addressed.

- Review policies dealing with types of tourism accommodation and related contextual policies – Any change to these policies will need to be carefully assessed against the SA objectives including the following:
  - Protect and enhance landscape character and quality
  - Conserve, promote and enhance Snowdonia’s cultural heritage and Welsh language
  - To promote good transport links to support the local economy
  - To aid the creation of local employment opportunities and businesses related to National Park Purposes.
  - Promote the use of sustainable transport modes and reduce the impact of cars, road freight and infrastructure.

- Amend retail policies to provide more flexibility on alternative uses - the main objectives which are relevant are, to aid the creation of local employment opportunities and businesses related to National Park Purposes and also to promote improved access to local services and amenities for all.

In conclusion even with the proposed changes outlined above and the changes which have occurred nationally, having reconsidered the SA it is thought that it remains relevant and will still ensure that the Local Development Plan going forward through the review will be sustainable and provide sustainable land use development. Having reconsidered the SA in terms of the potential areas for change as outlined in the review report it is thought that the SA objectives do not need to be revised and there is no gap in the objectives which need to be filled in order to ensure the plan remains sustainable going forward. Any new policy areas will be considered against the existing framework.

Reconsideration of the HRA

As part of the HRA screening of the Local Development Plan a series of Assessment Matrices were produced, which assessed each European designated site against the LDP policies which may potentially affect the site. It is considered that updating this matrix going forward against any of the new or revised policies will ensure that the LDP remains in line with the HRA guidelines. As the LDP is to be read as a whole it will be important to consider these new and revised policies within the context of the whole plan. It will be important to consider both direct effects and indirect effects of the policies. It will also be important to consider in-combination effects with other plans or programmes which operate in and around the National Park. Consideration will need to be given to the allocation of the EZ in the subsequent HRA assessment and the likelihood of significant adverse effects on European Designated sites. Should this be the case then a full Appropriate Assessment would need to be carried out.