

Cyngor Sir Ceredigion County Council - Integrated Impact Assessment (IIA)

An integrated tool to inform effective decision making



This **Integrated Impact Assessment tool** incorporates the principles of the Well-being of Future Generations (Wales) Act 2015 and the Sustainable Development Principles, the Equality Act 2010 and the Welsh Language Measure 2011 (Welsh Language Standards requirements) and Risk Management in order to inform effective decision making and ensuring compliance with respective legislation.

1. PROPOSAL DETAILS: (Policy/Change Objective/Budget saving)

Proposal Title	Local Development Plan Review and Revision
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Service Area	Performance and Economy Services	Corporate Lead Officer	Russell Hughes-Pickering	Strategic Director	Barry Rees
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Name of Officer completing the IIA	Sarah Groves-Phillips	E-mail	ldp@ceredigion.gov.uk	Phone no	01545572166
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Please give a brief description of the purpose of the proposal

Local Development Plan Review and Revision

This IIA will cover the whole LDP Review and Revision but to date only relates to the LDP Review Report and Delivery Agreement and subsequent Phosphates Impact Statement. The other stages (listed below) are the stages when changes to the existing LDP will be realised and it is only at that point that how the project will change policies can be considered.

The findings of the 3rd Annual Monitoring report of the Local Development Plan triggered plan review.

The LDP review and revision includes the following key stages:

- **The LDP Review Report:** This report sets out the extent of changes required to the LDP and the revision procedure to be followed for a replacement Local Development Plan. The revision of the current LDP will be informed by the findings of preceding AMRs, updates to the evidence base and ongoing surveys. The report must be formally approved by the LPA.

LDP Revision

- **Delivery Agreement:** This agreement requires approval from Welsh Government and sets out the timetable for producing the replacement LDP. The agreement also contains a community involvement scheme outlining the process by which any interested groups, individuals or developers can contribute to the plan. The local planning authority is then required to make the delivery agreement easily available for inspection by members of the public.
- **Preferred Strategy/Pre-deposit Strategy:** A vision, strategic issues, aims and objectives, key policies, monitoring targets and indicators, broad locations for delivering sustainable development needs, and spatial interpretation
- **Deposit Plan:** The plan will contain: Area-wide policies for development expressed generically where possible, including topic passed policies, Major allocations of land and specific policies and proposals for key areas of change or protection

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- Succinct reasoned justification to explain policies and to guide their implementation; and
- Proposals map on a geographical base (with inset maps, where appropriate)
- Integrated Sustainability Appraisal/Strategic Environmental Assessment/Habitats Regulations Assessment, Health Impact Assessment, Welsh Language Impact Assessment: These assessments cover the social, environmental, health, Welsh Language and economic effects of the LDP and will play an important part in demonstrating that the Replacement LDP is sound by ensuring that it reflects sustainable development objectives. The 5 main stages of conducting a Sustainability Appraisal that need to be integrated into LDP preparation are:
 Stage A – Scoping. Sets the context and objectives, establishing the baseline evidence and deciding the scope.
 Stage B – Appraisal. Developing and refining options and assessing effects.
 Stage C – Reporting. Preparing the SA Report.
 Stage D – Consulting. Consulting on the preferred option of the development plan and the findings of the SA Report.
 Stage E – Monitoring. Monitoring significant effects of implementing the development plan.
- LDP Submission, Examination and Adoption: An independent Inspector examines the plan, including compliance with legal and regulatory procedures (soundness check).
- This update relates to the proposed options around formally pausing work on the replacement LDP due to the impact of Phosphates on the Afon Teifi SAC and the interim advice provided by NRW which has effectively placed a moratorium on most development within the Teifi catchment for the foreseeable future. This is until apportionment work and mitigations can be developed to ensure developments can achieve Nutrient Neutrality or Betterment as determined by a test of likely significant effect (tSLE) and an Appropriate Assessment as outlined in the Habitats Regulations.

Who will be directly affected by this proposal? (e.g. The general public, specific sections of the public such as youth groups, carers, road users, people using country parks, people on benefits, staff members or those who fall under the protected characteristics groups as defined by the Equality Act and for whom the authority must have due regard).

All areas of the public will be directly affected by the LDP Review and Revision.

VERSION CONTROL: The IIA should be used at the earliest stages of decision making, and then honed and refined throughout the decision making process. It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable development, Welsh language and equality considerations wherever possible.

Author	Decision making stage	Version number	Date considered	Brief description of any amendments made following consideration
Cath Ranson	LDP Review Report	LDP2 / IIA001	September/October 2017	<i>This will demonstrate how we have considered and built in sustainable development principles and Well-being Goals throughout the evolution of a proposal.</i>
Cath Ranson	LDP Delivery Agreement	LDP2 / IIA002	September/October 2017(draft) January / February 2018	Takes into account responses to Consultation Draft Delivery Agreement and Review Report

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		LDP2 / IIA003	May 2018	Revised Delivery Agreement Timeline, following intervention by the WG Cabinet Secretary for the Environment
Cath Ranson	Preferred Strategy/Pre deposit Strategy	LDP2 / IIA004vs2	May 2019	Preferred Strategy prepared for Council consideration, taking into account results of engagement with relevant organisations, updating of evidence papers / background papers. Proposes revisions to context, key issues , five revised strategic policies and addition of one new strategic policy. Public consultation proposed late June to September exceeds 6 week minimum.
Sarah Groves-Phillips	LDP Pause	LDP2/IIA005v1	October 2021	IIA updated to reflect the Phosphates Impact Statement and subsequent options relating to plan preparation which include <ul style="list-style-type: none"> • Amending the strategy to exclude phosphate affected zones • Continuing with the existing strategy • Pausing work until greater clarity is ascertained on potential phosphate mitigations
	Deposit Plan Public Consultation			
	Integrated Sustainability Appraisal/Strategic Environmental Assessment, Health Impact AssessmentHabitat			
	LDP Submission, Examination and Adoption			
COUNCIL STRATEGIC OBJECTIVES: Which of the Council's Strategic Objectives does the proposal address and how?				



Corporate Strategy 2017-22	<p>The LDP contributes to and helps deliver all four of the Council's corporate priorities:</p> <ul style="list-style-type: none">• Boosting the Economy;• Investing in people's futures;• Enabling individual and family resilience;• Promoting environmental and community resilience. <p>Development Plans demonstrate how places are expected to change to accommodate development needs for the Plan period to provide for housing, employment, commercial, cultural, social needs within the context of delivering sustainable development and protecting and enhancing the environment. This is achieved through predicting land use development needs, directing development to the right locations and providing protection for important assets, including the county's culture and environment. In working toward the replacement Plan, the Council works with communities, public bodies, businesses, other organisations and the public. The Preferred Strategy identifies the scale of growth, proposes a settlement hierarchy for distribution of growth, and seeks to provide for affordable housing.</p> <p>The Plan seeks to provide opportunities for improving individual and collective futures by improving access to good quality, energy efficient housing, in well located and vibrant communities, well connected to employment opportunities and services and facilitating improved opportunities for the use of Welsh in education, in the home, in the local community and the work place. It seeks to do this by identifying land to facilitate school rationalization, ways that good design can reduce energy demand, by improving the quality of job opportunities and by providing for the use of Welsh in the home, in work and in communities and improving the resilience of energy supplies by identifying a target for production of renewable energy.</p> <p>Evidence informing LDP decisions, including from infrastructure providers and public comments in response to formal consultations is tested through appraisals as the Plan is being prepared and, subsequently, through the LDP examination procedure.</p>
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NOTE: As you complete this tool you will be asked for **evidence to support your views**. These need to include your baseline position, measures and studies that have informed your thinking and the judgement you are making. It should allow you to identify whether any changes resulting from the implementation of the recommendation will have a positive or negative effect. Data sources include for example:

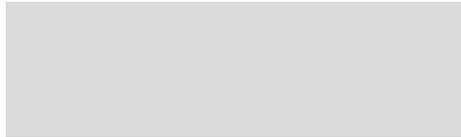
- *Quantitative data - data that provides numerical information, e.g. population figures, number of users/non-users*
- *Qualitative data – data that furnishes evidence of people's perception/views of the service/policy, e.g. analysis of complaints, outcomes of focus groups, surveys*
- *Local population data from the census figures (such as Ceredigion Welsh language Profile and Ceredigion Demographic Equality data)*
- *National Household survey data*
- *Service User data*

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- *Feedback from consultation and engagement campaigns*
- *Recommendations from Scrutiny*
- *Comparisons with similar policies in other authorities*
- *Academic publications, research reports, consultants' reports, and reports on any consultation with e.g. trade unions or the voluntary and community sectors, 'Is Wales Fairer' document.*
- *Welsh Language skills data for Council staff*





2. SUSTAINABLE DEVELOPMENT PRINCIPLES: How has your proposal embedded and prioritised the five sustainable development principles, as outlined in the Well-being of Future Generations (Wales) Act 2015, in its development?			
Sustainable Development Principle	Does the proposal demonstrate you have met this principle? If yes, describe how. If not, explain why.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to the principle?
<p>Long Term Balancing short term need with long term and planning for the future.</p>	<p>The LDP Review Report sets out the changes required by the LDP and the revision procedure to follow.</p> <ul style="list-style-type: none"> • The Delivery Agreement is one of the first requirements in the replacement LDP procedure which is an agreement between Ceredigion Council and the Welsh Government to establish: • The timetable for adopting a plan • Co-ordination with the preparation of other plans and strategies/documents • Resource commitment • Community Involvement Scheme 	<p>The 3rd Annual Monitoring Report of the Local Development Plan triggered Plan review in October 2016.</p> <p>The confirmed Delivery Agreement incorporated changes agreed by Council (January 2018) made in response to consultation responses received and feedback from Overview and Scrutiny Committee</p> <p>Following agreement by Council (Jan 2018) an appendix was attached to the Review Report, summarising consultation responses received and the Council's Comments made thereon (January 2018)</p> <p>Annual Monitoring Reports 4 and 5 have been undertaken subsequently</p>	<p>The Review Report and Delivery Agreement are somewhat procedural in nature. Balancing short term need with long term need and planning for the future will be considered in the later stages (from preferred strategy onwards).</p> <p>Response to consultation on the Preferred Strategy, together with a proposed Council position, will be considered by Overview and Scrutiny, with feedback considered by Cabinet and Council. Recommendations will be carried forward into work on the Deposit Plan</p>



	<p>The purpose of the Replacement LDP is to provide for the long term development needs of the County through to March 2033.</p> <p>It further aims to provide for WG PPW 11 Minerals requirements collectively with other authorities (Carmarthenshire and Pembrokeshire County Councils and Pembrokeshire Coast National Park Authority) to provide for a minimum of. A minimum of 10 years for crushed rock and 7 years for land won sand and gravel should therefore be maintained during the entire plan period (i.e. to provide to 2043 and 2040 respectively)</p> <p>The Preferred Strategy proposes development to meet identified strategic needs, with further more detailed work in preparation of the Deposit Plan providing detailed allocations and evidence</p> <p>In relation to the Phosphates in the Afon Teifi SAC amending the councils approach re a 6 town strategy to not deliver growth in the Teifi Valley would solve a short term problem but would not resolve long term issues about where the county should grow. Thus in considering the overall needs of the county it is advised an LDP pause is adopted so the replacement LDP can effectively plan for sustainable growth across all the urban centres of Ceredigion</p>	<p>Preferred Strategy: Background papers and topic papers set out the evidence for the scale of Growth needed and the proposed settlement strategy, accounting for its distribution.</p> <ul style="list-style-type: none"> • The Sustainability Appraisal/ Strategic Environmental Assessment Scoping Report (SA/SEA); • The Habitats Regulation Assessment Screening Report (HRA); • The Welsh Language Impact Assessment (WLIA); • The Health Impact Assessment (HIA); <p>• A phosphates position paper has been developed</p>	<p>Updated assessments, as necessary, will be included for the Deposit Plan, for the Plan submission to Welsh Government for Examination and for the Pan proposed for adoption as follows</p> <ul style="list-style-type: none"> • The Sustainability Appraisal/ Strategic Environmental Assessment Scoping Report (SA/SEA); Screening Reports; • The Habitats Regulation Assessment Scoping Report (HRA); • The Welsh Language Impact Assessment (WLIA); <p>• Members of the policy team are driving the agenda through the Phosphates working group, collaboration with neighbouring authorities and the council is leading on setting up a nutrient management board for the Afon Teifi</p>
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<p>Collaboration Working together with other partners to deliver.</p>	<p>The LDP Process and LDP production is based on early and effective community involvement (which is outlined in detail in the Delivery Agreement). The Community Involvement Scheme enables the process to consider a wide range of views, with the aim of building a broad consensus on the strategy and policies for the LDP.</p> <p>The Delivery Agreement enables a fast and responsive approach to plan-making, with published timetables for preparation and regular strategic monitoring and review to enable plans to better reflect changing circumstances.</p>		
	<p>Work on aspects of evidence has been and continues to be undertaken by authorities across South west and Mid Wales, as part of the Growing Mid Wales Partnership and as part of the South Wales Regional Aggregates Working Party. (Review in progress of RTS 1). An all wales Phosphates working group has been established and collaboration is ongoing with neighbouring authorities on the Teifi.</p>	<p>Meeting notes and staged delivery. Completed Evidence Papers</p>	<p>For the Deposit Plan a number of key figures will be incorporated into the Deposit Plan, following the completion of evidence, including on Affordable Housing Viability, Cross border Housing Market Assessment, Gypsy Traveller Accommodation Needs Assessment, Minerals (South Wales Regional Aggregates Working Party - review of the Regional Technical statement 1st Review (in progress) and Renewable Energy Assessment.</p>



<p>Involvement Involving those with an interest and seeking their views.</p>	<p>Regulation 14 of the Town and Country Planning (LDP) Wales Regulations (2005) requires the Council to work with various bodies in the preparation of the LDP and to consult with the general public. The details of involvement are set out in the Delivery Agreement between the Council and Welsh Government.</p> <p>The Delivery Agreement helps to ensure that the Council complies with key principles for community involvement throughout the Revision Process and that such activity is carried out in line with the Council's Community Engagement Policy (approved by Council 13/12/2012) and Public Engagement Toolkit (approved by Cabinet 01/07/2014). The Community Engagement Policy's objectives are:</p> <ul style="list-style-type: none"> • To ensure that throughout the Council there is a clear understanding of and commitment to engaging with communities about decisions that affect their lives. • To establish a co-ordinated and consistent approach to community engagement in Ceredigion in accordance with the 'National Principles for Public Engagement in Wales'. • To ensure that community engagement is inclusive by giving every citizen of the county the opportunity to express their views, particularly people and groups which may be harder to reach and that those views will be listened to and respected. 	<p>Involvement will be undertaken in accordance with the Regulations.</p>	
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	<ul style="list-style-type: none"> To keep our communities informed of the outcomes of engagement. To evaluate the effectiveness of community engagement activities and seek continuous improvement. 		
	<p>Drawing on the Delivery Agreement Community Involvement Scheme, preparation of the Preferred Strategy has been undertaken with involvement of relevant organisations, including</p> <ul style="list-style-type: none"> Formal public consultation on the Call for Candidate Sites; Key Stakeholder meetings including with PSB and PSB exec groups / Project Groups; Strategic Housing Partnership and Social Housing Grant meetings; SA/SEA stakeholder meetings Meetings with Senior Welsh Government officers to discuss options and rural issues Meeting with Dwr Cymru / Welsh Water re infrastructure issues; Meetings with Growing Mid Wales Partnership; Internal meetings with officers from a range of depts. Including Estates, Economy, Development Management, Flooding, Highways etc. Elected Member meetings including LDP Member Working Group meetings, Area Member meetings, All Member workshops, policy specific pre-committee briefings and numerous one to one meetings on specific local concerns; 	<p>Meeting notes.</p>	<p>Formal consultation to be undertaken in accordance with the regulations; recognising poor response to the Call for Candidate Sites, this will be reopened for further submissions alongside the consultation on the preferred Strategy and will include requests to those submitting inadequate information to rectify this.</p> <p>Comments received in response to the Preferred Strategy Consultation will be considered by the Council to enable the Authority to consider revision to the Strategy and to consider any additional work requirements for preparation of the Deposit Plan.</p> <p>The Deposit Plan will also be subject to the staged updating of Assessments as identified previously.</p> <p>The LDP team are working closely with NRW, DCWW, WG, neighbouring authorities and are advising the public through web based communication as and when new updates are available to the NRW interim advice on phosphates</p>

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Prevention Putting resources into preventing problems occurring or getting worse.	A key principle of the Plan led system is to direct the right scale and type of development to the most appropriate locations within Ceredigion, consistent with principles of sustainability and explicit sustainability objectives and in so doing to provide certainty and confidence and to avoid inappropriate development.		
	In identifying a proposed settlement hierarchy for the Preferred Strategy identifies settlements proposed for growth, with those not explicitly identified eligible only for minor developments in compliance with PPW 10 (WG policy).	Self explanatory in the Preferred Strategy, supported by background papers	The Deposit Plan will provide the opportunity for further detail on those areas where development isn't encouraged.
	In relation to Phosphates the Policy team are directing existing staff resources to support ongoing work, on mitigations, apportionment, seeking external sources of funding where appropriate and assisting the ecology service in undertaking tSLE and Appropriate Assessments	Meeting notes and phosphates related ongoing work outputs	Phosphates mitigations work both local and nationally is ongoing and the policy and ecology team are contributing to the discussion and works as requested.

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<p>Integration Positively impacting on people, economy, environment and culture</p>	<p>The LDP Review and Revision will positively impact on people, economy, environment and culture and endeavour to benefit all three. The project will do this by:</p> <ul style="list-style-type: none">• Facilitating Sustainable Development by preparing and monitoring the LDP through a process that integrates Sustainability Appraisal, (incorporating Strategic Environmental Assessment requirements), with plan making.• Basing the Replacement LDP production on early and effective community involvement, to consider a wide range of views, with the aim of building a broad consensus on the strategy and policies.• Ensuring policy integration by producing a Replacement LDP that is internally consistent and integrated with other main policies and strategies at national, regional and local level (without unnecessary repetition).		
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	<ul style="list-style-type: none">• Delivering a fast and responsive approach to plan-making, with published timetables for preparation, fewer iterations of the plan before adoption, and regular strategic monitoring and review to enable plans to better reflect the changing circumstances in contemporary Wales.• Delivering a Revised LDP that is strategic, concise and distinctive in setting out how Ceredigion will develop and change, based on a robust understanding of relationships between places, including across administrative boundaries, and drivers for change.• Delivery of sustainable development, taking account of infrastructure requirements, availability of resources, viability and market factors.		
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	<p>The Preferred Strategy identifies those National, regional and local plans and policies that have informed it's preparation.</p>	<p>see proposed Preferred Strategy chapter 2</p>	<p>Emerging national policy (Welsh Government National Development Framework) (Welsh Government proposed review of PPW 10 2020) and regional / Area plans (Natural Resources Wales Mid Wales and Marine Area Statements and the SWRAWP Regional Technical Statement 2nd Review) will help improve integration as the Plan progresses through Deposit and Submission.</p> <p>Soundness of the Plan, as submitted, will need to take account of relevant updated legislation, strategies and Plans.</p> <p>Updated assessments, as necessary, will be included for the Deposit Plan, for the Plan submission to Welsh Government for Examination and for the Pan proposed for adoption as follows</p> <ul style="list-style-type: none"> • The Sustainability Appraisal/ Strategic Environmental Assessment Scoping Report (SA/SEA); • The Habitats Regulation Assessment Scoping Report (HRA); • The Welsh Language Impact Assessment (WLIA);
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3. WELL-BEING GOALS: Does your proposal deliver any of the seven National Well-being Goals for Wales as outlined on the Well-being of Future Generations (Wales) Act 2015? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal. We need to ensure that the steps we take to meet one of the goals aren't detrimental to meeting another.			
Well-being Goal	Does the proposal contribute to this goal? Describe the positive or negative impacts.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to the goal?
Generality	Yes, intrinsic to plan preparation	<p>The Preferred Strategy has been subject to:</p> <ul style="list-style-type: none"> • an integrated Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA); • a Habitats Regulations Appraisal Screening Report (HRA); • a Health Impact Assessment (HIA) Report; and • an Integrated Impact Assessment (IIA) <p>Through rigorous assessment and appraisal these documents seek to demonstrate the extent to which the Council has sought to deliver on the seven goals of the Wellbeing Act.</p> <p>This is complemented by an evidence paper that sets out the relationship between these Goals and the objectives of the Plan¹.</p> <p>All these appraisals / assessments have sought to deploy the Act's five ways of working.</p>	<p>These assessments are iterative such that at each stage the Plan should improve on delivery of the Wellbeing goals.</p> <p>Assessments will be updated at each formal stage of Plan preparation, taking into account any negative responses to consultation on the Preferred Strategy and building in any newly identified Policy</p>
3.1. A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs.	N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy		



	<p>The Preferred Strategy proposes the strategic approach to delivering the right development to the right locations / places to support economic growth and housing delivery.</p> <p>Compliance with PPW 10 means that housing and economic growth may not be appropriate in all locations.</p>	as General row above	Assessments will be updated at each formal stage of Plan preparation, taking into account any negative responses to consultation on the Preferred Strategy and building in any newly identified Policy
<p>3.2. A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change).</p>	<p>N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.</p>		
	<p>The Preferred Strategy identifies the mechanisms to ensure that environmental resilience is delivered and climate change is taken into account in proposals going forwards.</p>	<p>as General row above Soundness of the Plan requires consistency with the requirements of section 6 of the Environment (Wales) Act 2016</p>	Assessments will be updated at each formal stage of Plan preparation, taking into account any negative responses to consultation on the Preferred Strategy and building in any newly identified Policy
	<p>In relation to Phosphates in light of the interim guidance from NRW it is vital to meet our statutory duties that development in the Teifi SAC catchment achieves nutrient neutrality or betterment therefore development is subject to tSLE and Appropriate Assessment where required</p>	Ongoing phosphates work	Assessments are ongoing and work on identifying long term solutions and mitigations is active

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<p>3.3. A healthier Wales People's physical and mental wellbeing is maximised and health impacts are understood.</p>	<p>N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy</p>		
	<p>The Preferred Strategy proposes growth compatible with travel by public Transport and active travel routes</p>	<p>as General row above</p>	<p>Assessments will be updated at each formal stage of Plan preparation, taking into account any negative responses to consultation on the Preferred Strategy and building in any newly identified Policy</p>
<p>3.4. A Wales of cohesive communities Communities are attractive, viable, safe and well connected.</p>	<p>N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.</p>		
	<p>Placemaking is a central principle of Planning Policy Wales, reflected in the thrust of the Preferred Strategy</p>	<p>as General row above</p>	<p>as above Further detail is proposed to be included in the Deposit Plan; Assessments will be updated at each formal stage of Plan preparation, taking into account any negative responses to consultation on the Preferred Strategy and building in any newly identified Policy There will be the opportunity for emerging Community place plans to be adopted as supplementary planning guidance to the replacement LDP on or following adoption, provided that they are consistent with LDP policy</p>



<p>3.5. A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental well-being.</p>	<p>N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.</p>		
	<p>The Preferred Strategy sets out the vision for the LDP 'By 2033, Ceredigion will be a county of vibrant, bilingual and engaged communities, where people choose to live, study, work and visit, committed to the resilience of its economy, culture, heritage, environment and natural resources and to health and wellbeing.'</p>	<p>As General row above</p>	<p>as above Further detail is proposed to be included in the Deposit Plan; Preparation of details in the Deposit Plan will assist in the improvement of sustainable development and responses to climate change.</p> <p>Assessments will be updated at each formal stage of Plan preparation, taking into account any negative responses to consultation on the Preferred Strategy and building in any newly identified Policy The Deposit Plan will draw on emerging WG NDF proposals and NRW proposals for Area Statements</p>

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<p>3.6. A more equal Wales People can fulfil their potential no matter what their background or circumstances.</p> <p><i>In this section you need to consider the impact on equality groups, the evidence and any action you are taking for improvement.</i></p> <p><i>You need to consider how might the proposal impact on equality protected groups in accordance with the Equality Act 2010?</i></p> <p><i>These include the protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or beliefs, gender, sexual orientation.</i></p> <p>Please also consider the following guide:: Equality Human Rights - Assessing Impact & Equality Duty</p>	<p>Describe why it will have a positive/negative or negligible impact.</p> <p><i>Using your evidence consider the impact for each of the protected groups. You will need to consider do these groups have equal access to the service, or do they need to receive the service in a different way from other people because of their protected characteristics. It is not acceptable to state simply that a proposal will universally benefit/disadvantage everyone. You should demonstrate that you have considered all the available evidence and address any gaps or disparities revealed.</i></p>	<p>What evidence do you have to support this view?</p> <p><i>Gathering Equality data and evidence is vital for an IIA. You should consider who uses or is likely to use the service. Failure to use <u>data</u> or <u>engage</u> where change is planned can leave decisions open to legal challenge. Please link to involvement box within this template. Please also consider the general guidance.</i></p>	<p>What action (s) can you take to mitigate any negative impacts or better contribute to positive impacts?</p> <p><i>These actions can include a range of positive actions which allows the organisation to treat individuals according to their needs, even when that might mean treating some more favourably than others, in order for them to have a good outcome. You may also have actions to identify any gaps in data or an action to engage with those who will/likely to be effected by the proposal. These actions need to link to Section 4 of this template.</i></p>																					
<p>Age Do you think this proposal will have a positive or a negative impact on people because of their age? (Please tick ✓)</p> <table border="1" data-bbox="62 1021 772 1340"> <tr> <td rowspan="2">Children and Young People up to 18</td> <td>Positive</td> <td>Negative</td> <td>None/ Negligible</td> </tr> <tr> <td>Yes</td> <td></td> <td></td> </tr> <tr> <td rowspan="2">People 18-50</td> <td>Positive</td> <td>Negative</td> <td>None/ Negligible</td> </tr> <tr> <td>Yes</td> <td></td> <td></td> </tr> <tr> <td rowspan="2">Older People 50+</td> <td>Positive</td> <td>Negative</td> <td>None/ Negligible</td> </tr> <tr> <td>Yes</td> <td></td> <td></td> </tr> </table>	Children and Young People up to 18	Positive	Negative	None/ Negligible	Yes			People 18-50	Positive	Negative	None/ Negligible	Yes			Older People 50+	Positive	Negative	None/ Negligible	Yes			<p>N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.</p>		
Children and Young People up to 18		Positive	Negative	None/ Negligible																				
	Yes																							
People 18-50	Positive	Negative	None/ Negligible																					
	Yes																							
Older People 50+	Positive	Negative	None/ Negligible																					
	Yes																							

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Disability Do you think this proposal will have a positive or a				N/A at LDP Review Report and Delivery Agreement stage.		
negative impact on people because of their disability? (Please tick ✓)				Impacts of the project will be realised from Preferred Strategy stage onwards.		
Hearing Impairment	Positive	Negative	None/ Negligible			
			Yes			
Physical Impairment	Positive	Negative	None/ Negligible	Preferred Strategy Settlement Strategy proposes improved access to services	Lifetime Homes Standard This is a requirement of the current Plan which is intended to be continued into the Deposit Plan for LDP2. Proposals for housing to be delivered in more sustainable locations, on Public Transport / Active Travel Route, thereby providing improved access to services for all sectors of the community.	To ensure that the Lifetime Homes standard is detailed and that allocations are made in accordance with the proposed Preferred Strategy
	yes					
Visual Impairment	Positive	Negative	None/ Negligible			
	Yes					
Learning Disability	Positive	Negative	None/ Negligible			
	Yes					
Long Standing Illness	Positive	Negative	None/ Negligible			
	Yes					
Mental Health	Positive	Negative	None/ Negligible			
	Yes					
Other	Positive	Negative	None/ Negligible			
Transgender Do you think this proposal will have a positive or a negative impact on transgender people? (Please tick ✓)				N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.		
Transgender	Positive	Negative	None/ Negligible			
			Yes			

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Marriage or Civil Partnership Do you think this proposal will have a positive or a negative impact on marriage or Civil partnership?				N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be		
(Please tick ✓)				realised from Preferred Strategy stage onwards. Preferred Strategy: impacts identified		
Marriage	Positive	Negative	None/ Negligible			
			Yes			
Civil partnership	Positive	Negative	None/ Negligible			
			Yes			
Pregnancy or Maternity Do you think this proposal will have a positive or a negative impact on pregnancy or maternity? (Please tick ✓)				N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.		
Pregnancy	Positive	Negative	None/ Negligible			
			Yes			
Maternity	Positive	Negative	None/ Negligible			
			Yes			
Race Do you think this proposal will have a positive or a negative impact on race? (Please tick ✓)				N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.		
White	Positive	Negative	None/ Negligible			
			Yes			
Mixed/Multiple Ethnic Groups	Positive	Negative	None/ Negligible			
			Yes			
Asian / Asian British	Positive	Negative	None/ Negligible			
			Yes			
Black / African / Caribbean / Black British	Positive	Negative	None/ Negligible			
			Yes			

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Other Ethnic Groups	Positive	Negative	None/ Negligible			

Religion or non-beliefs Do you think this proposal will have a positive or a negative impact on people with different religions, beliefs or non-beliefs? (Please tick ✓)				N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.		
Christian	Positive	Negative	None/ Negligible			
			Yes			
Buddhist	Positive	Negative	None/ Negligible			
			Yes			
Hindu	Positive	Negative	None/ Negligible			
			Yes			
Humanist	Positive	Negative	None/ Negligible			
			Yes			
Jewish	Positive	Negative	None/ Negligible			
			Yes			
Muslim	Positive	Negative	None/ Negligible			
			Yes			
Sikh	Positive	Negative	None/ Negligible			
			Yes			
Non-belief	Positive	Negative	None/ Negligible			
			Yes			
Other	Positive	Negative	None/ Negligible			
			Yes			

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Sex Do you think this proposal will have a positive or a negative impact on men and/or women? (Please tick ✓)				N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.		
Men	Positive	Negative	None/ Negligible			
			Yes			
Women	Positive	Negative	None/ Negligible			
			Yes			
Sexual Orientation Do you think this proposal will have a positive or a negative impact on people with different sexual orientation? (Please tick ✓)						
Bisexual	Positive	Negative	None/ Negligible			
			Yes			
Gay Men	Positive	Negative	None/ Negligible			
			Yes			
Gay Women / Lesbian	Positive	Negative	None/ Negligible			
			Yes			
Heterosexual / Straight	Positive	Negative	None/ Negligible			
			Yes			

Having due regards in relation to the three aims of the Equality Duty - determine whether the proposal will assist or inhibit your ability to eliminate discrimination; advance equality and foster good relations.

3.6.2. How could/does the proposal help advance/promote equality of opportunity?
 You should consider whether the proposal will help you to: ● Remove or minimise disadvantage ● To meet the needs of people with certain characteristics ● Encourage increased participation of people with particular characteristics

The details of the project can be assessed from the preferred strategy stage which is the stage at which a vision, strategic issues, aims and objectives, key policies, monitoring targets and indicators, broad locations for delivering sustainable development needs, and spatial interpretation are determined.



The Preferred Strategy has been subject to:

- an integrated Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA);
- a Habitats Regulations Appraisal Screening Report (HRA);
- a Health Impact Assessment (HIA) Report; and
- an Integrated Impact Assessment (IIA)

Through rigorous assessment and appraisal these documents seek to demonstrate the extent to which the Council has sought to deliver on the seven goals of the Wellbeing Act; this is complemented by an evidence paper that sets out the relationship between these Goals and the objectives of the Plan². All these appraisals / assessments have sought to deploy the Act's five ways of working. Assessments will be updated at each formal stage of Plan preparation, taking into account any negative responses to consultation on the Preferred Strategy and building in any newly identified Policy

Undertaking an LDP pause to allow for mitigations and solutions to the Phosphates issue on the river Teifi will ensure that the replacement plan does not only direct development to select unaffected areas of Ceredigion but rather maintains the councils 6 town approach and provides equal opportunity for development in sustainable locations countywide. Preparing a plan which identifies 'no development zones' in 3 of the 6 main towns would disadvantage a significant proportion of the population of the county in terms of realising housing options, starting businesses, providing for Welsh Language opportunities etc. By pausing the LDP until mitigations can be developed it is hoped that when replacement plan preparation is restarted development will be able to be directed to all 6 sustainable locations across Ceredigion.

3.6.3. How could/does the proposal/decision help to eliminate unlawful discrimination, harassment, or victimisation?
You should consider whether there is evidence to indicate that: ● *The proposal may result in less favourable treatment for people with certain characteristics* ● *The proposal may give rise to indirect discrimination* ● *The proposal is more likely to assist or impeded you in making reasonable adjustments*

The project will aim to eliminate discrimination by being prepared in accordance with the principles of sustainable development. Impacts of the project will be realised from preferred strategy stage onwards.

The Preferred Strategy has been written to deliver sustainable development that meets the requirements of all sectors of the community

3.6.4. How could/does the proposal impact on advancing/promoting good relations and wider community cohesion?
You should consider whether the proposal with help you to: ● *Tackle prejudice* ● *Promote understanding*

Impacts of the project will be realised from preferred strategy stage onwards.

The LDP is founded on Welsh Government's Planning Policy Wales, on its central principles of placemaking, Growing our economy in a sustainable manner, Creating and sustaining communities; making best use of resources, facilitating accessible and healthy environments and maximizing environmental protection and limiting environmental impact. It is considered that these key principles underpin wider community cohesion.

² Topic Paper: Local Development Plan and Well-being and the soundness of the Plan
 May 2018
 FINAL VERSION LDP2 / IIA004vs2 Oct 2021

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3.7. A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh Language are promoted and protected. <i>In this section you need to consider the impact, the evidence and any action you are taking for improvement. This in order to ensure that the opportunities for people who choose to live their lives and access services through the medium of Welsh are not inferior to what is afforded to those choosing to do so in English, in accordance with the requirement of the Welsh Language Measure 2011.</i>				Describe why it will have a positive/negative or negligible impact.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to positive impacts?
Will the proposal be delivered bilingually (Welsh & English)?	Positive	Negative	None/ Negligible	The project will be delivered bilingually in accordance with the Council's legal obligations under the statutory requirements of the Welsh Language Standards.	Procedures set out in the Delivery Agreement / Community Involvement Scheme (June 2018)	
	✓					
Will the proposal have an effect on opportunities for persons to use the Welsh language?	Positive	Negative	None/ Negligible	N/A at LDP Review Report & Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.		

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	✓			The Preferred Strategy proposes that the entire county is classified as linguistically sensitive for the assessment as to the potential for Development proposals to impact on the Welsh language.	Preferred Strategy proposed policy SP06 The Plan facilitates land being brought forward to deliver Schools rationalisation programme	Detailed policies to be defined during preparation of the Deposit Plan Language Impact assessments to be undertaken to inform decision on proposed allocations for inclusion within the Deposit Plan Assessments will be updated at each formal stage of Plan preparation, taking into account any negative responses to consultation on the Preferred Strategy and building in any newly identified Policy
Will the proposal increase or reduce the opportunity for persons to access services through the medium of Welsh?	Positive	Negative	None/ Negligible	The project will be delivered bilingually in accordance with the Council's legal obligation under the statutory requirements of the Welsh Language Standards.		
	✓					
How will the proposal treat the Welsh language no less favourably than the English language?	Positive	Negative	None/ Negligible	The project will: • be delivered bilingually in accordance with the Council's legal obligation under the statutory requirements of the Welsh Language Standards; • At later stages will consider the impact of proposed development on Language sensitive areas		
	✓					

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				Detailed Language impacts to be assessed as work in preparation for the Deposit Plan	Welsh Language Topic Paper and Welsh Language Impact Assessment	Plan and supporting evidence base to be published bilingually
Will it preserve promote and enhance local culture and heritage?	Positive	Negative	None/ Negligible	N/A at LDP Review Report and Delivery Agreement stage. Impacts of the project will be realised from Preferred Strategy stage onwards.		



4. STRENGTHENING THE PROPOSAL: If the proposal is likely to have a negative impact on any of the above (including any of the protected characteristics), what practical changes/actions could help reduce or remove any negative impacts as identified in sections 2 and 3?			
4.1 Actions.			
What are you going to do?	When are you going to do it?	Who is responsible?	Progress
Impacts of the project will be realised from Preferred Strategy stage onwards.			
No negative impacts are considered to arise from the proposed Preferred Strategy. Some requirements for further information are identified through assessments to ensure that decisions are fully informed and to identify potential negative assessments moving forwards	In response to consultation and in preparing the Deposit Plan: Autumn / Winter 2019	Planning Policy manager Senior Ecologist	Assessments undertaken on the preferred Strategy
4.2. If no action is to be taken to remove or mitigate negative impacts please justify why. <i>(Please remember that if you have identified unlawful discrimination, immediate and potential, as a result of this proposal, the proposal must be changed or revised).</i>			
Impacts of the project will be realised from preferred strategy stage onwards.			
No negative / discriminatory impacts are considered to arise from the proposed Preferred Strategy			
4.3. Monitoring, evaluating and reviewing. <i>How will you monitor the impact and effectiveness of the proposal?</i>			
The 2004 Act requires authorities to keep under review matters that may affect the planning and development of their areas. Following the review and revision of the LDP the replacement LDP will include a monitoring framework, to be prepared as part of the Deposit Plan.			

5. RISK: What is the risk associated with this proposal?

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Impact Criteria	1 - Very low	2 - Low	3 - Medium	4 - High	5 - Very High
Likelihood Criteria	1 - Unlikely to occur	2 - Lower than average chance of occurrence	3 - Even chance of occurrence	4 - Higher than average chance of occurrence	5 - Expected to occur
Risk Description	Impact (severity)		Probability (deliverability)		Risk Score
Risks of the project will be realised from Preferred Strategy stage onwards.					<i>Probability x Impact e.g. 3 x 5 = 15</i>
The main risks identified within the Integrated Impact Analysis have to do with the Plan being consistent as it progresses forward, with emerging national and area policies that are not yet available, even in draft and that late availability as the Plan progresses may introduce delay to Plan preparation and late stage modifications to secure consistency. The team has past experience of updating plans to take new policy into account These risks include:					
The Welsh Government National Development Framework [Draft July 2019; Published Plan September 2020]	3		5		15
Natural Resources Wales: Mid Wales and Marine Area Statements [Autumn 2019 draft, Spring 2020 publication]	2		5		10

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SWRAWP emerging Regional Technical Statement (Aggregates) revision 2 Likely to require working into the Deposit Plan	2	5	10
Planning Policy Wales Update [Autumn 2020, likely to require compliance update to the Inspector, during the Examination of the Plan]	2	5	10
The main risks associated with an LDP pause stem from Phosphates mitigations proving difficult or unviable along the Teifi in the medium term	5	4	20
Another main risk form the LDP pause stems from the existing LDP being out of date and pressure from external developments that do not accord with local policy, thus relying on national policy where local policy does not fit	3	2	6

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Does your proposal have a potential impact on another Service area?			
Development Management; Housing Policy; Economy and Growth Highways Ecology Waste Carbon Reduction			

6. SIGN OFF			
Position	Name	Signature	Date
Service Manager	Cath Ranson	<i>Cath Ranson</i>	31 August 2017
Preferred Strategy		<i>Cath Ranson</i>	24 th May 2019
Phosphates Update	Sarah Groves-Phillips	<i>Sarah Groves-Phillips</i>	4 th of October 2021
Corporate Lead Officer	Russell Hughes-Pickering	<i>Russell Hughes-Pickering</i>	24 th May 2019
Chief Executive	Eifion Evans		
Portfolio Holder	Cllr Rhodri Evans		