

CEREDIGION COUNTY COUNCIL

Report to: Council

Date of meeting: 21st October 2021

Title: Phosphates position paper for the LDP

Purpose of the report: To inform Council of the implications of phosphate levels in the Teifi SAC catchment on delivery of the replacement LDP.

For: Decision

Cabinet Portfolio and Cabinet Member: Economy and Regeneration, Cllr Rhodri Evans

The position paper was considered by Cabinet on 5th October 2021, and it was recommended for approval by Council.

In January 2021 Natural Resources Wales (NRW) published evidence in relation to phosphate levels for riverine Special Areas of Conservation (SACs) in Wales, (including the Afon Teifi in Ceredigion) accompanied by interim planning position statement/ guidance which was updated in May 2021.

This report provides an overview of the NRW guidance and its implications on the current and replacement LDP and sets out some high level options for the Council to consider, with a view to finding the way forward, whilst considering there will be timescale implications upon Plan preparation. The situation has potential corporate and policy implications for spatial development and potential impacts within urban and rural Ceredigion.

NRW has produced 'interim planning advice' to avoid further deterioration in environmental capacity, which relates to the Afon Teifi catchment. As the Local Planning Authority (LPA) the Council is the competent authority as defined in the Habitats Regulations and are required to have regard for advice given by the NRW (a statutory consultee) when making planning decisions for both individual developments and the Local Development Plan (LDP). All LDPs should be screened to determine whether any policies are likely to have a significant effect on the SACs.

The implications for the current LDP:

- phosphates impact on 50% USCs, 14% RSCs
- Total area of land affected - 806 km² or 44.6% of Ceredigion.
- 14 allocated housing sites / 24% of all housing allocations, equating to 572 houses of which 114.4 are expected to be affordable are constrained.
- 44 linked settlements are affected.
- 5 employment allocations (28% of total employment allocations in Ceredigion) and 2 mixed use allocations (20% of the total).

Implications for the replacement LDP:

- 89 candidate sites from 293 are potentially affected. (30% of total sites submitted.)
- There will be a requirement for a 3rd call for candidate sites which may need to include land for phosphate mitigation measures, as and when the types of land and mitigation measures are known.
- The proposed settlement hierarchy for the replacement LDP will need to be reviewed as many settlements proposed are impacted by the phosphate situation.
- The SA/SEA will need to be reviewed to consider the social, economic and environmental implications from the impacts of phosphates on the Afon Teifi catchment area.
- The replacement LDP will be subject to a further screening in relation to its potential impact on the riverine SACs, and potentially a requirement for each development allocation to undertake a full Appropriate Assessment where it may result in an impact on the SAC waterbody.
- Strategic and spatial changes to the LDP will require key pieces of evidence to undergo review including settlement role and function, spatial options, housing supply, viability and the Welsh language impact assessment.
- Future Wales- The National Plan 2040 identified the Teifi Valley as a regional growth zone, this area is now entirely constrained by phosphates and therefore the inability to meet National Policy will need to be considered in the plan review.

The timetable for preparation of the replacement LDP will require a form of delay factored in irrespective of the preferred option, due to the impacts of the phosphate situation.

Options appraisal:

1. 6 town plan- Continue with plan preparation with the amended Preferred Strategy reflecting the previously agreed 6 town approach. There would be significant risks with allocating in areas impacted by phosphates- the LDP would not be able to demonstrate deliverability at examination and would likely fail the tests of soundness.
2. Passive approach- temporarily pause the LDP preparation until further information, evidence and mitigation measures have been agreed. The Adopted Plan is in place and has no drop dead date, allowing for consideration of development proposals in areas that are not affected by phosphates. This approach has been adopted by Pembrokeshire, Carmarthenshire and Brecon Beacons National Park Authority.
3. Spatial realignment- Commencement on a new replacement Local Development Plan with a new Delivery Agreement and a full reconsideration of the plan, including a spatial strategy that excluded those areas affected by phosphates. This is the preferred option for the Welsh Government. It would however mean we would be unable in the median term to allocate any future housing or employment land within the Teifi catchment.

In reality all options have associated risks and the report explores these in more detail, however it would be a likely waste of council resources to continue with option

1 - a plan that in all likelihood would fail at examination as we would be unable to demonstrate its deliverability and calling its soundness into question. In terms of option 2 this appears to be the preferred option regionally as it allows time to explore the emerging evidence and data and reconsider our options as we understand more about mitigations. It would also allow time for a Nutrient Management Board and associated Nutrient Management Plan for the Teifi to be developed. In terms of option 3 whilst this would deliver a plan in a timely manner it would direct most of the growth required across the county to a much smaller number of service centres and there would still be questions over the soundness of the plan if it is not meeting the needs of a significant proportion of the population of the county. It may also have political ramifications locally as it would be adopting a different approach to our traditional model of 6 towns. Therefore it is recommended that option 2 an indefinite pause is adopted in order to allow time for the science and evidence to build, mitigations to be developed and local solutions sought.

Has an Integrated Impact Assessment been completed? If, not, please state why

Yes and IIA has been completed for plan preparation and updated to take account of the phosphates pause.

Wellbeing of Future Generations:

Summary:

Long term:

Collaboration:

Involvement:

Prevention:

Integration:

Recommendation(s):

It is recommended that the Council agrees a temporary but as yet unspecified length pause for the replacement local development plan subject to confirmation by Welsh Government.

Reasons for decision:

To allow for further work to be undertaken around the phosphate situation for evidence and data gathering and for mitigation solutions to be devised.

To ensure the replacement plan meets the tests of soundness, is deliverable and fit for purpose.

Overview and Scrutiny:	The report has been presented to the LDP Working Group and the Development Management Task and Finish group and Cabinet and it was agreed at all groups that option 2 was the only realistic option.
Policy Framework:	Ceredigion Local Development Plan 2007-2022 and Ceredigion replacement Local Development Plan 2018-2033.
Corporate Priorities:	<p>Corporate Priority 1- Boosting the Economy.</p> <p>1.1 Promote and provide employment opportunities for the citizens of Ceredigion.</p> <p>1.3 Develop 21st Century Infrastructures across the County.</p> <p>Corporate Priority – 2 Investing in People’s Future.</p> <p>2.4 Promote and facilitate the distinct and vibrant bilingual culture and identity of Ceredigion.</p> <p>Corporate Priority -3 Enabling Individual and Family Resilience.</p> <p>3.1 Promote the well-being of individuals and families within safe, affordable and accessible homes.</p> <p>Corporate Priority 4 – Promoting Environmental And Community Resilience.</p> <p>4.1 Actively engage in programmes to deal with the effects of climate change.</p> <p>4.2 To improve infrastructure to facilitate future development to meet community needs.</p> <p>4.3 To help and assist communities to become more self-resilient.</p>
Finance and Procurement implications:	LDPs are costly to produce, so to continue with a plan that would likely fail at examination would have cost implications, to pause the plan will also have cost implications as it will stretch out the length of time it will take to deliver a plan.
Legal Implications:	The authority has a duty to prepare a Local Development Plan. However Welsh Government are involved in seeking solutions to the issue and have supported neighbouring authorities in determining a pause is the most sensible solution.
Staffing implications:	None
Property / asset implications:	None
Risk(s):	As outlined in report

Statutory Powers:

Background Papers: Phosphate position paper.

Appendices: None

Corporate Lead Officer: Russell Hughes Pickering

Reporting Officer: Sarah Groves- Phillips

Date: 11-10-2021

Papur Sefyllfa - Ffosffadau

Position Paper - Phosphates



Cyngor Sir
CEREDIGION
County Council

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1. Introduction and Purpose

1.1. Process and Timeline

The preparation of the Replacement LDP (rLDP) reflects the Council's statutory responsibilities under the Planning and Compulsory Purchase Act 2004 - setting out policies and proposals for future development and use of land for Ceredigion over the period to 2033. A revised Delivery Agreement (DA) in relation to the rLDP was approved by Welsh Ministers in March 2020 just prior to the national lockdown. As a result of the timing and the subsequent notification by Welsh Government to cease formal consultations on the rLDP and focus on background evidence. The current approved DA is redundant and a replacement DA will be required once works formally recommence.

During January 2021, officers were proceeding with background evidence work – notably the preparation of evidence in relation to recent house price changes and impact on population changes in the county. However, on 21st January 2021, Natural Resources Wales (NRW) published evidence in relation to phosphate levels for riverine Special Area of Conservation (SACs) in Wales (including the Teifi). This was accompanied by planning position statements/guidance¹. This should not be confused with The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021, albeit interested parties are advised to appraise themselves of these also to develop a rounded picture beyond the LDP itself (see Section 5 of this Paper).

This Paper provides an overview of the NRW guidance and its implications on the rLDP. It sets out some high-level options that Members may wish to endorse for further exploration by officers with a view to finding a way forward. The only thing that is certain at this stage is that there will be timescale implications upon Plan preparation. This Paper should be read with the knowledge that the situation is constantly evolving as new information emerges. The matter is deemed to be requiring reporting due to its potentially

¹ Note: NRW published an update to their interim guidance on the 11th May 2021, the content of which and any future iterations will frame ongoing consideration.

significant corporate and policy implications – most notably in terms of spatial implications and the potential impact within rural Ceredigion.

2. Summary of Current Issues

2.1. Natural Resources Wales’ interim advice for planning applications within the river Special Areas of Conservation (SACs) catchments (issued January 2021).

Ceredigion is characterised by its rich environmental qualities and is home to a number of areas and features designated for their environmental importance including the Afon Teifi riverine Special Areas of Conservation (SAC).

Following new evidence about the environmental impacts of phosphate in watercourses, Natural Resources Wales (NRW) have assessed the 9 riverine SACs in Wales. This assessment based on tighter targets for the water quality of watercourses established that phosphorus breaches are widespread within Welsh SAC rivers with over 60% of waterbodies failing against the challenging targets.

As a result of this failure NRW have issued ‘interim planning advice’ to avoid further deterioration in environmental capacity. This ‘advice’ relates to all Riverine SACs whose catchments extend into Ceredigion namely, the Afon Teifi. As a Local Planning Authority (LPA), the Council is required to have regard to the advice given by NRW when making planning decisions (for both individual developments and Local Development Plans (LDP)). Consequently, any proposed development within the river catchment that might increase phosphate levels will need to clearly evidence that the development can demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. In most cases there will be limited capacity to connect to the public sewerage system and an alternative solution will have to be found. This requirement on drainage considerations will impact on all development that increases the volume or concentration of wastewater.

A map to show the catchment area of the rivers within Ceredigion is set out in Figure 1.

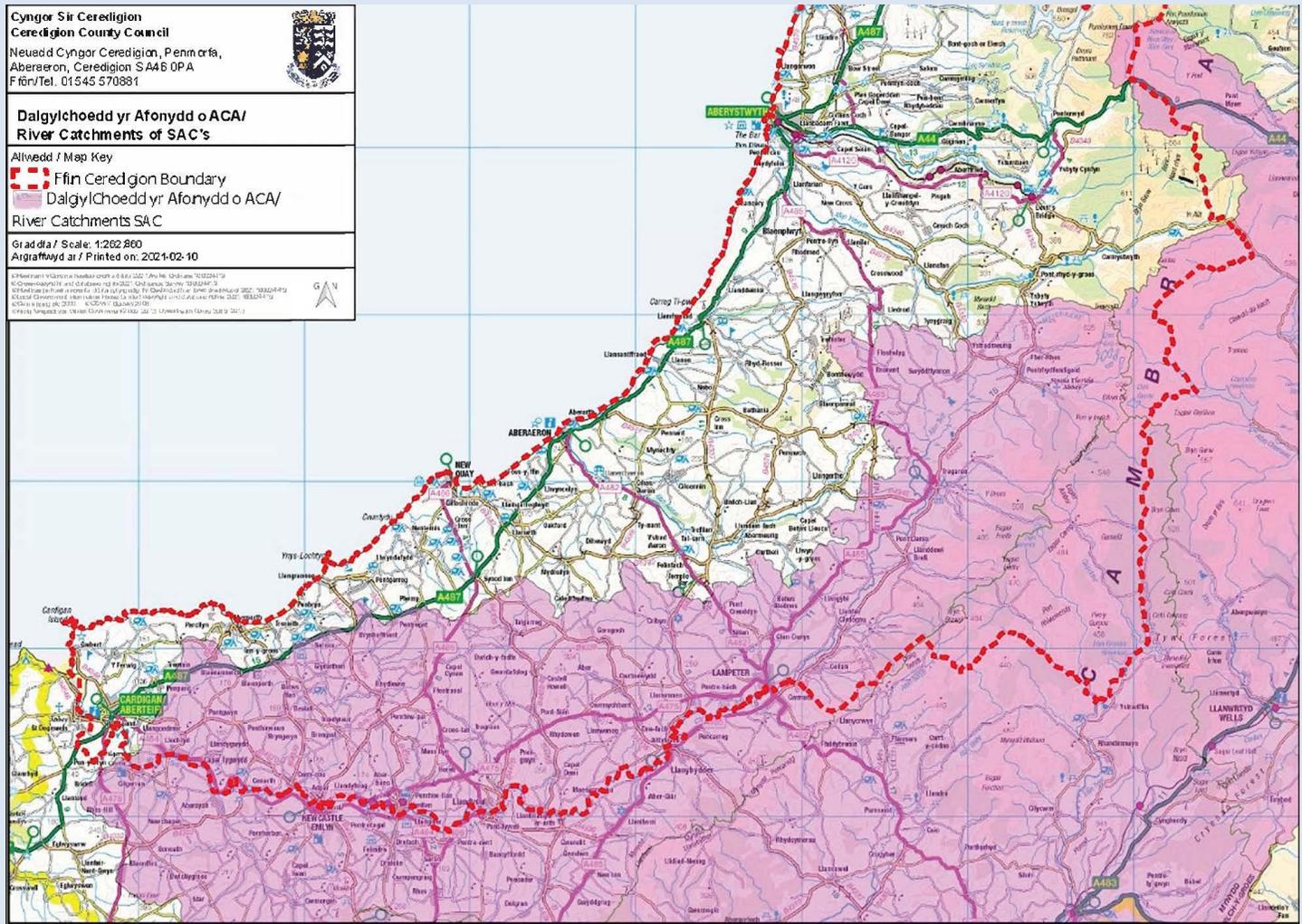


Figure 1: Afon Teifi SAC Catchment Area in Ceredigion

Drainage proposals for developments are required to be given significant consideration within these catchment areas.

NRW have provided [interim planning advice for developers](#). The guidance includes an outline of the type of development which is unlikely to have an impact on phosphate levels in the watercourses.

Further and more detailed information can also be [found directly on NRW's website](#).

The NRW advice note outlines, where a planning application within the catchment areas of the Afon Teifi, cannot evidence that the development proposal would result in phosphate neutrality or betterment, that unfortunately the Local Planning Authority would not be able to support the application. This reflects the unacceptable impact on the water quality of the rivers which are sensitively designated as a SAC. This also has implications for the policies and proposals of the Local Development Plan (including site allocations).

Officers are working on understanding the full implications of NRW's guidance for current planning applications and the progress of the rLDP. The Council must ensure that development proposals do not harm the environmental capacity of our watercourses. Officers are also working collaboratively with NRW in understanding the wider issues and identifying the way forward for all proposals, to find solutions that comply with the requirements of the new interim planning advice.

2.2. Waste Water Treatment Works (WwTW)

The position with regards WwTW phosphate permits is as follows.

There are current phosphate permits at: Llandewi Brefi.

There are no planned Phosphate improvements in Ceredigion within the 2020 -2025 Dŵr Cymru Welsh Water (DCWW) Asset Management Plan (AMP7).

With regard to future investment programmes, DCWW have an agreed two AMP programme (i.e., AMP7 & AMP8) with NRW. However, whilst AMP7 is known the schemes for inclusion in AMP8 are not yet at a stage where they've been finalised. However it is understood a phosphate permit may be introduced in Tregaron. It is understood that the location of WwTWs where

phosphate permits are required to be introduced or tightened is guided by NRW's National Environment Programmes (NEP).

A phosphate permit limit is imposed on a respective DCWW WwTW by the Environmental Regulator (NRW in Wales) and essentially requires DCWW ensure that they remove phosphates from wastewater to meet that limit.

Phosphate permits are assessed over an average of all phosphate results in a rolling 12-month period. The typical method to remove phosphorous from a WwTW is to introduce ferric (iron) dosing and 'strip' the phosphate – the ferric reacts with the phosphate and forms solid precipitates which are then removed via a settlement tank.

It can be concluded that the issues faced are infrastructural as well as environmental in this regard. It also frames the discussion with an awareness of the wider role of multi-agency organisations – e.g., DCWW and NRW and in this regard the Council will be unable to address this matter in isolation.

3. Implications for the Current LDP

3.1. The Settlement Hierarchy

At present the following settlements are impacted by Phosphates:

Table 1: LDP Settlements affected by WWTWs (RAG status):

LDP Settlement Hierarchy / Category	WWTW with existing phosphate stripping in place and up to date permit	WWTW with phosphate stripping improvements planned in AMP 7 (2020-2025)	WWTW with phosphate stripping improvements planned in AMP 8 (2026-2030)	WWTW without Phosphate Stripping in place or planned
Urban Service Centres			Tregaron	Llandysul Lampeter Newcastle Emlyn (Adpar)
Rural service Centres				Cenarth Pontrhydfendigaid
Linked Settlements	Llanddewi Brefi			Aberbanc Alltyblacca Betws Bledrws Betws Ifan Beulah Blaenannerch Blaenporth Brongest

LDP Settlement Hierarchy / Category	WWTW with existing phosphate stripping in place and up to date permit	WWTW with phosphate stripping improvements planned in AMP 7 (2020-2025)	WWTW with phosphate stripping improvements planned in AMP 8 (2026-2030)	WWTW without Phosphate Stripping in place or planned
				Bronnant Bryngwyn Brynhoffnant Capel Dewi (SOUTH) Cellan/Fishers Arms Coed y Bryn Cribyn Croeslan Cwm Cou Cwrtnwydd Drefach Ffostrasol Gorsgoch Henllan/Trebedw Highmead Horeb Llandyfriog Llandygwydd

LDP Settlement Hierarchy / Category	WWTW with existing phosphate stripping in place and up to date permit	WWTW with phosphate stripping improvements planned in AMP 7 (2020-2025)	WWTW with phosphate stripping improvements planned in AMP 8 (2026-2030)	WWTW without Phosphate Stripping in place or planned
				Llangybi Llanwnnen Llechryd Maesymeillion Penrhiwllan Pentrellwyn Plwmp Prengwyn Rhydlewys / Hawen Rhydowen Sarnau Silian Talgarreg Tanygroes Ystrad Meurig

Phosphates therefore impact upon 50% USCs and 14% of RSCs in the current LDP. The total land area of Ceredigion affected by Phosphates equates to 806sq.km or 44.6%

3.2. Residential: Allocations

A total of 14 allocated housing sites (24% of all housing allocations within the county) are impacted. Most of the issues impact on Urban and Rural Service Centres (USC and RSC) respectively as defined within the strategy of the current LDP.

This equates to an allocated amount of 572 houses of which 114.4 were expected to be affordable homes.

Table 2: LDP Housing Allocated Sites within Afon Tefi SAC Catchment

Allocated Site Ref	Site Name	Settlement Name	Area_Ha	Number of Houses	Number of Affordable Houses
H0401	Land opposite Parc y Trap, Adpar	Adpar	2.69	35	7
H0501	Former Lampeter Primary school	Llanbedr Pont Steffan/Lampeter	0.65	12	2.4
H0502	Site rear of Ffynon Bedr	Llanbedr Pont Steffan/Lampeter	0.81	20	4
H0503	Site on corner of Forest Road	Llanbedr Pont Steffan/Lampeter	0.57	9	1.8
H0504	Forest Road	Llanbedr Pont Steffan/Lampeter	4.52	90	18
H0505	Land adj Maes-yr-deri	Llanbedr Pont Steffan/Lampeter	4.2	105	21
H0601	Ty ol i'r Fawydd/ Rear of the Beeches	Llandysul	4.85	126	25.2
H0701	Land off Dewi Road	Tregaron	1.8	36	7.2

Allocated Site Ref	Site Name	Settlement Name	Area_Ha	Number of Houses	Number of Affordable Houses
H0702	Land rear to Rhyd Y Fawnog	Tregaron	1.52	38	7.6
H1101	Land off Spring Meadow Estate	Cenarth	0.37	7	1.4
H1102	Gog/dwyrain Ysgol Cenarth/ North east Cenarth School	Cenarth	0.79	17	3.4
H1103	Ty ol/ i'r gog/dwyrain Tegfan/ Land at and n/ east of Tegfan	Cenarth	0.86	14	2.8
H2001	Dolwerdd	Pontrhydfendigaid	1.76	44	8.8
H2002	Land Adjacent to Rock House	Pontrhydfendigaid	0.77	19	3.8
Total			26.16	572	114.4

3.3. Residential: Other components of housing supply

As well as the USCs and RSCs listed above a number of Linked Settlements are also affected and in accordance with Policy S04 they have no remaining capacity and are currently running at minus 75 units (please note the -75 number is because these settlements had already exceeded their allowance within the LDP (2007-2022) by 75 units to date April 2021).

Table 3: LDP Linked Settlements within Afon Tefi SAC Catchment

Linked Settlement Name	Settlement Group Name	Units Remaining
Blaenannerch	Aberporth / Parclyn	4
Brynhoffnant	Aberporth / Parclyn	-2
Sarnau	Aberporth / Parclyn	-17
Blaenporth	Aberporth / Parclyn	3
Tanygroes	Aberporth / Parclyn	-2
Llechryd	Aberteifi / Cardigan	-12
Llandygwydd	Cenarth	2
Cribyn	Felinfach/ Ystrad Aeron	-5
Betws Bledrws	Llanbedr Pont Steffan/Lampeter	4
Cellan/Fishers Arms	Llanbedr Pont Steffan/Lampeter	3
Cwrtnewydd	Llanbedr Pont Steffan/Lampeter	1
Drefach	Llanbedr Pont Steffan/Lampeter	-4
Gorsgoch	Llanbedr Pont Steffan/Lampeter	-2
Llangybi	Llanbedr Pont Steffan/Lampeter	5
Llanwnnen	Llanbedr Pont Steffan/Lampeter	-17
Llwyn-y-groes	Llanbedr Pont Steffan/Lampeter	3
Silian	Llanbedr Pont Steffan/Lampeter	3
Aberbanc	Llanbedr Pont Steffan/Lampeter	-25

Linked Settlement Name	Settlement Group Name	Units Remaining
Coed y Bryn	Llanbedr Pont Steffan/Lampeter	-2
Croeslan	Llandysul	10
Henllan/Trebedw	Llandysul	-7
Horeb	Llandysul	-4
Maesymeillion	Llandysul	-4
Prengwyn	Llandysul	-1
Rhydlewys / Hawen	Llandysul	-1
Rhydowen	Llandysul	0
Talgarreg	Llandysul	-9
Capel Dewi (SOUTH)	Llandysul	4
Ffostrasol	Llandysul	-5
Penrhiwllan	Llandysul	-6
Pentrellwyn	Llandysul	4
Alltyblacca	Llanybydder	0
Highmead	Llanybydder	3
Plwmp	Cei Newydd/New Quay	-1
Betws Ifan	Newcastle Emlyn (Adpar)	-3
Beulah	Newcastle Emlyn (Adpar)	-4
Brongest	Newcastle Emlyn (Adpar)	-1
Bryngwyn	Newcastle Emlyn (Adpar)	3
Cwm Cou	Newcastle Emlyn (Adpar)	-4
Llandyfriog	Newcastle Emlyn (Adpar)	6
Pont-rhyd-y-groes	Pontrhydfendigaid	4
Ystrad Meurig	Pontrhydfendigaid	1

Linked Settlement Name	Settlement Group Name	Units Remaining
Bronnant	Tregaron	0
Llanddewi Brefi	Tregaron	0
	Total	-75

3.4. Employment Allocations

In total some 5 allocations equating to 39.25 ha (28% of all employment allocations within the County) are impacted. All are located within USCs and RSCs.

Table 4: LDP Employment Allocated Sites within Afon Tefi SAC Catchment

Allocated Site Ref	Area Ha	Site Name	Settlement Name
E0501	15.94	Parc Busnes Llambed/Llambed Business Park	Llanbedr Pont Steffan/Lampeter
E0502	1.07	Safle yr Hen Farchnad/Old Mart Site	Llanbedr Pont Steffan/Lampeter
E0601	6.43	Parc Menter Llandysul/Llandysul Enterprise	Llandysul
E0602	5.13	Parc Busnes Horeb/Horeb Business Park	Llandysul
E0801	10.68	Parc Aberporth	Aberporth/Parcllyn
Total	39.25		

It should be noted that the delivery of employment proposals across the County is also supported through policies S03 and S04 which enable appropriate unallocated opportunities to come forward. Such opportunities may also be adversely impacted.

3.5. Mixed Use Allocations

In total some 2 mixed use allocations equating to 55.89 ha (20% of all mixed use allocations within the County) are impacted. The sites are located within an USC or RSC.

Table 5: LDP Mixed Use Allocated Sites within Afon Tefi SAC Catchment

Allocation Site Ref	Site Name	Settlement Name	Area Ha
M0701	Prosiect Cylch Caron, ty ol Gwesty Talbot/ Cylch Caron Project, rear Talbot Hotel	Tregaron	3.67
M0801	Maes Awyr Gorllewin Cymru, Blaenannerch/ West Wales Airport, Blaenannerch	Aberporth / Parcllyn	52.22

**Please note there are a number of reasons an allocated site may not come forward, phosphates may just be one impact of many and therefore the numbers stated above need to be considered in this light.*

4. Implications for the Replacement LDP

4.1. Candidate Sites

To date as part of the preparation of rLDP, 2 calls for candidate sites have been made whereupon 293 candidate sites were proposed. Work has been undertaken to assess these sites against a number of criteria, however not Phosphates specific analysis. Of the candidate sites submitted 89 are potentially impacted by the NRW planning advice on phosphates which equates to 30% of total candidate site submissions. There will be a need to run a 3rd call for candidate sites and to go back to existing site proposers with a Phosphates specific questionnaire in order to ascertain if or how the NRW guidance can be met.

A future call for candidate sites may also call for land for phosphates mitigation measures as and when the types of land required become known.

4.2. The Settlement Hierarchy

The proposed settlement hierarchy for the rLDP included the following settlements (those highlighted in red are now impacted by phosphates). It will be necessary to review the settlement hierarchy in some detail and consider alternative options for delivering housing in these areas.

Hierarchy terminology:

USC Urban Service Centre

RSC rural Service Centre

SLS sustainable linked settlement

LLS large linked settlement

LS Linked settlement

Minor OMH – minor open market housing

Alloc sites and WF – Allocated sites and wind fall

Nat Pol – National Policy only

Table 6: rLDP Proposed Settlement Hierarchy Highlighting those Impacted by Phosphates

Service Centre and Linked Settlement name	Settlement Type	Potential Development
1 Aberaeron (Llwyncelyn / Ffosyffin)		
Aberarth	SLS	Minor OMH
Ciliau Aeron	SLS	Minor OMH
Pennant	LS	Nat Pol
2 Cardigan		
Ferwig	SLS	Minor OMH
Gwbart	LS	Nat Pol
Llangoedmor	LS	Nat Pol
Llechryd	LLS	Alloc Sites+ WF
Penparc	LLS	Alloc Sites+ WF
3 Aberystwyth /Llanbadarn Fawr /Waunfawr /Penparcau / Commins Coch / Rhydyfelin		
Blaenplwyf	SLS	Minor OMH
Capel Bangor	LLS	Alloc Sites+ WF
Capel Seion	LS	Nat Pol
Commins Coch	Moved to USC	
Goginan	LS	Nat Pol
Llanfarian	LLS	Alloc Sites+ WF

Service Centre and Linked Settlement name	Settlement Type	Potential Development
Llangorwen	LS	Nat Pol
4 Newcastle Emlyn (Adpar)		
Betws Ifan	LS	Nat Pol
Beulah	LS	Nat Pol
Brongest	LS	Nat Pol
Bryngwyn	LS	Nat Pol
Cwm Cou	LS	Nat Pol
Llandyfriog	SLS	Minor OMH
5 Lampeter		
Cellan/Fishers Arms	SLS	Minor OMH
Cwrtnwydd	LS	Nat Pol
Drefach / Llanwennog	LS	Nat Pol
Llangybi	SLS	Minor OMH
Llanwnen	SLS	Minor OMH
6 Llandysul		
Capel Dewi(SOUTH)	LS	Nat Pol
Coed y Bryn	LS	Nat Pol
Croeslan	SLS	Minor OMH
Ffostrasol	SLS	Minor OMH

Service Centre and Linked Settlement name	Settlement Type	Potential Development
Henllan/Trebedw	SLS	Minor OMH
Horeb	Needs to be considered further	
Penrhiwllan / Aberbanc	SLS	Minor OMH
Pentrellwyn	LS	Nat Pol
Rhydowen / Pontsian	LS	Nat Pol
Talgarreg	LS	Nat Pol
7 Tregaron		
Bron-nant	LS	Nat Pol
Llanddewi Brefi	SLS	Minor OMH
Llangeitho	SLS	Minor OMH
8 Aberporth / Parcilyn		
Blaenannerch	LS	Nat Pol
Blaenporth	SLS	Minor OMH
Tanygroes	SLS	Minor OMH
Tresaith	LS	Nat Pol
9 Bow Street		
Llandre	LLS	Alloc Sites+ WF
10 New Quay / Cross Inn		

Service Centre and Linked Settlement name	Settlement Type	Potential Development
Caerwedros / Llwyndafydd	LS	Nat Pol
Maen-y-groes	LS	Nat Pol
Pentre'r Bryn / Synod Inn	LS	Nat Pol
Plwmp	LS	Nat Pol
11 Cenarth		
Llandygwydd	LS	Nat Pol
12 Felinfach / Ystrad Aeron		
Cilcennin	LS	Nat Pol
Cribyn	SLS	Minor OMH
Dihewyd	LS	Nat Pol
Talsarn	LS	Nat Pol
13 Llanarth		
Gilfachreda	SLS	Minor OMH
Mydroilyn	LS	Nat Pol
14 Llanilar		
Llanafan	LS	Nat Pol
Lledrod	LS	Nat Pol
15 Llanon		
Bethania	LS	Nat Pol

Service Centre and Linked Settlement name	Settlement Type	Potential Development
Cross Inn (Llanon) / Nebo	LS	Nat Pol
16 Llanrhystud		
Llangwyrfon	LS	Nat Pol
17 Llanybydder		
Alltyblacca / Highmead	SLS	Minor OMH
18 Penrhyncoch		
19 Ponterwyd		
Devils Bridge	LS	Nat Pol
20 Pontrhyndendigaid		
Pont-rhyd-y-groes	LS	Nat Pol
Ysbyty Ystwyth	LS	Nat Pol
Ystrad Meurig	LS	Nat Pol
21 Talybont		
Eglwysfach / Furnace	SLS	Minor OMH
Tre Taliesin	SLS	Minor OMH
Tre'r Ddol	SLS	Minor OMH
22 Borth		
Dol-y-bont	Removed as Settlement	

Service Centre and Linked Settlement name	Settlement Type	Potential Development
Ynyslas	LS	Nat Pol
23 Brynhoffnant		
Llangrannog	LS	Nat Pol
Pontgarreg	LS	Nat Pol
Sarnau	LS	Nat Pol
Rhydlewis/ Hawen	LS	Nat Pol

4.3. Sustainability Appraisal / Strategic Environmental Assessment

Dependent on the agreed way forward, there will be a need to review the SA/SEA in an iterative manner. Given the nature of the issues being discussed, there are likely to be social, economic, and environmental implications that will require review.

4.4. Habitats Regulations Assessment

Irrespective of the agreed way forward the emergence of the phosphate issue in relation to the freshwater SACs will require the rLDP to be subject to a further screening in relation to its potential impact on these designations. Dependent on the agreed way forward, this may require a full Appropriate Assessment being required for each development allocation where it may result in an impact on the SAC and its water quality. It should be noted that without deliverable and evidenced mitigation no site will pass a full Appropriate Assessment.

4.5. Mitigation and other Solutions

Dependent on the agreed way forward, there will be implications – notably those impact assessments underpinning the Plan’s preparation. Due to the

scale and strategic nature of any change to the Plan there will be a requirement to revisit some of the earlier stages of the Plans preparatory process.

Those key pieces of evidence that are likely to require review include settlement role and function, spatial options, housing supply, viability (in the event of a developer pays option) and the Welsh language impact assessment. The scale and scope of the work will vary subject to the respective option and reflects the need for the Plan's evidence base to be iterative and responsive to changes in circumstances and the Plan's content.

Future Wales the National Plan 2040 was published on the 24th of February 2021 and identified two regional growth areas for Ceredigion these include:

- Aberystwyth
- Teifi Valley (Lampeter, Llandysul, New Castle Emlyn and Cardigan)

It is now clear that outside of Cardigan, the Teifi Valley regional growth zone is now entirely constrained by phosphates, therefore consideration of this inability to meet National policy will need to be made in plan review.

The rLDP in reflecting the issues associated with phosphates will irrespective of the way forward require additional policies to mitigate (where appropriate) for the impact and potentially provide a pathway for acceptable developments to be considered and permitted. In order to deliver such policies, provisions and mechanisms will need to be developed which provide evidence and a framework for the implementation of these policies. Such approaches are further considered within this paper.

5. Options Appraisal

5.1. Overview

The following high-level options are provided to frame discussion and to inform the agreed next steps. It should be noted that matters are evolving with the following intended to guide our understanding of the options available. This section should be read with the awareness that whilst there can be an emphasis on seeking to avoid the affected areas, there is still likely to be a need to identify solutions within the areas themselves as part of a forward-thinking approach - as such reference is made to Section 6 of this Paper.

5.2. Timescales

It is recognised that the issues of phosphates and the publication of the NRW Interim Guidance has had a wide ranging impact on Planning across Wales. In this regard the preparation of an LDP is no different with clear implications upon the content and deliverability of its policies and provisions as well as its compliance with legislation and national planning Policy and guidance. Whilst there are impacts on its content there will also be delays in the timetable for the preparation of the Plan. In setting out the following options it should be recognised that irrespective of which option is preferred, a form of delay will have to be factored in to include the potential for further reporting and additional changes to its content.

The following table presents the options available in respect of the rLDP:

Table 7: Options available in respect of the rLDP

Options	Explanation	Risks	Impact on timescales
<p>A 6 Town Plan</p> <p>Continue with plan preparation with amended Preferred Strategy (PS) reflecting previously agreed settlement strategy e.g. 6 town focus</p>	<p>This option acknowledges the importance of the council’s priority to maintain a 6 town approach in the rLDP if this remains the case then it may be possible to continue drafting a plan with the settlement strategy previously agreed at PS stage with some amendments. Policies on mitigations and robust monitoring would be required. Allocations could still be made in the phosphate</p>	<p>There would be significant risks involved in continuing to allocate in areas impacted by phosphates as the LPA would not be able to demonstrate delivery at examination. In addition, further risks include a failure to comply with the Council’s duty as the Competent Authority under the Habitat Regulations (HRA). In this respect the content of the Revised LDP will require a further screening with allocated sites in the affected areas requiring an appropriate assessment under the Habitat Regulations. This option is not considered to be realistic unless there are investments by Dwr Cymru Welsh Water (DCWW) programmed in advance of the Examination to Wastewater Treatment Works (WwTW)</p>	<p>The LPA could submit an amended Delivery Agreement (DA) and resume work on the rLDP within a matter of weeks this would result in an overall delay factoring in Covid 19 as well, to the previously agreed DA of approx. 18 months.</p>

	<p>affected areas, but not expected to be delivered in the earlier stages of the plan period.</p>	<p>in the south of the County within the Plan period so that they are phosphate enabled and that development can be delivered by 2033. This is highly unlikely. This would still result in the requirement to move much of the proposed development in the affected catchments to the end of the Plan period / trajectory which would call into question how realistic the Plan is, and its compliance with the Tests of Soundness. In terms of private investment through the ‘developer pays’, it is highly unlikely to secure sufficient contributions to enable upgrading WwTW facilities, given viability is already acknowledged as low in the Teifi Valley. Additional costs could render developments unviable or may necessitate a reduction in other planning contributions such as the</p>	
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		<p>provision of affordable housing and public open space etc. The emphasis would have to be on proactive monitoring, and it would have to be demonstrated that the mitigation as set out in Section 6 of this Paper are achievable and realistic and at present it is too early to judge this.</p> <p>In terms of costs there is potential for abortive costs as the council pursue a strategy that would most likely not be supported at examination, assuming mitigation measures and solutions are not available by deposit stage of the rLDP.</p>	
<p>Passive approach (Wait and See)</p> <p>Halt plan preparation until certainty that the phosphate issue can be resolved</p>	<p>This option acknowledges the fact that the Council has an Adopted Plan in place, with no drop dead date, and given the uncertainty</p>	<p>The current LDP is out of date and there is a risk that the LPA would increasingly see applications considered in light of national policy with less local emphasis. This could lead to pressure from Welsh</p>	<p>It is not known how long it will take to develop solutions and mitigations for the Phosphates issue and any future nutrient releases from NRW therefore a passive</p>

	<p>with regards the ongoing emergence of the 'phosphate issue', the Council may consider it appropriate to pause with the preparation of the replacement Plan temporarily. There also remains a possibility that there will be future focus on the estuarine areas, notably in terms of nutrients. The current Development Plan is still allowing for the consideration of development proposals in those areas that are not affected and as such key corporate developments (including the strategic /</p>	<p>Government on compliance with national policy where the development plan is out of date.</p> <p>With any 'LDP pause' there are issues and challenges that are not able to be addressed by current policies which have been highlighted or exacerbated by Covid 19 including delivery of affordable housing, supporting economic growth and recovery and revitalising the high street. These would remain in place in any pause.</p>	<p>approach runs a risk that the council could be without an up to date plan for some considerable time.</p>
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	<p>corporate development of significance in the growth areas) can be considered. However, they remain subject to the constraints resulting from the issues in relation to phosphates and the interim NRW guidance.</p> <p>Following the establishment of Corporate Joint Committees, the preparation of an SDP for the region will commence in the summer of 2022.</p> <p>Any delay in relation to the Plans preparation may result in non-adoption to ensure it</p>		
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	<p>complies with the content of the emerging SDP.</p> <p>It is worth noting that this is the approach Pembrokeshire, Carmarthenshire and Brecon Beacons National Park Authority Local Planning Authorities have taken – all formally declaring an unspecified LDP pause.</p>		
<p>Spatial realignment (WG preferred option)</p> <p>Withdraw the rLDP and commence a new rLDP with a revised plan period – following an approach advocated by WG of</p>	<p>This option would see the plan process start from scratch with a new DA and a full reconsideration of the plan. This would include considering an alternative spatial strategy that excluded the phosphate affected</p>	<p>This option would involve the removal of all development allocations (including housing and employment) within the affected areas from the Plan approx. 44% of the county namely settlements of Lampeter, Tregaron, Adpar and various RSCs and Linked Settlements as outlined in RAG status table above). Whilst this would address</p>	<p>Upon preparation of a new DA a new timescale would be set which would usually be 3.5 years with 3 month slippage so adoption of the replacement plan could be expected by end of 2025 assuming submission of the</p>

<p>avoiding allocation in Phosphate affected zones</p>	<p>settlements and re-distributing growth to sustainable areas that are not affected. In order to ensure plan delivery and meeting the tests of soundness. Whilst some development could occur in the phosphate affected areas it would need to comply with NRW guidance. For future developments, policies in the plan could reflect a criteria based approach allowing developments to come forward if and when mitigations are available.</p>	<p>some of the legal and procedural issues in progressing the Plan it would reduce the development opportunities arising in the affected areas. However, it should be recognised that the implications of the phosphate issue would de facto have this affect in any case. Whilst it would not necessarily see the settlements in the affected areas re-classified in terms of their position in the strategy it would see their contribution in terms of growth significantly downgraded. This plan for growth outside of 3 of the main towns could have a number of impact including on the Welsh speaking rates of the area as future growth would be restricted (though it is now) it may also redistribute growth to smaller settlements which could have adverse impacts on those Welsh speaking</p>	<p>DA to WG by end of this year.</p>
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		<p>communities who may feel there is too much growth in their locality. It would also see a burden of growth falling on Aberystwyth as the only remaining regional growth zone identified in Future Wales, which may cause concern as the town would be absorbing all of the growth for Ceredigion in one regional growth zone instead of two.</p>	
<p>SDP approach</p>	<p>This option would see the council move towards work on a regional Strategic Development Plan which is now required under the Local Government Act. This is a collaborative plan across the GMW region including Powys, Ceredigion and BBNPA</p>	<p>The risks involved in such an approach include relying on an outdated LDP with no drop dead date, and the associated implications of having limited 'locally proofed policies' and thus being reliant on national policy for decision making. However it must be stated that the ability of the LDP to diverge from national policy in the rLDP is highly constrained, so in effect any rLDP will be more closely aligned with Future</p>	<p>Work could commence on an SDP following the first meeting of the CJC in July 2022 whereupon a DA will need to be prepared setting out the statutory timetable for SDP preparation of approx. 5 years therefore adoption of an SDP could be anticipated in 2027 – 2028. Thus allowing for an</p>

	<p>and will be required regardless of the approach taken above. However if work were to commence on this using existing resources (as sourcing an SDP team is likely to prove challenging given the difficulty in planning role recruitment locally) whilst an rLDP on pause, it would allow existing staff to channel resources into this area and upon adoption work on an LDP lite rather than a rLDP which will likely need a formal review upon adoption of the SDP anyway.</p>	<p>Wales than is perhaps the wider expectations of the community. WG have been clear in their stance that an rLDP should be prepared alongside an SDP and thus shifting focus to SDP may not be supported at a national level. Finally Powys have a plan in place with a drop dead date of 2026 and therefore their focus is on adopting an rLDP prior to this deadline so they are not out of plan period before any SDP is adopted. So there are some 'out of plan sync' issues locally.</p>	<p>LDP lite to begin and be completed by 2029-2030.</p>
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6. Potential Technical Solutions and Policy Based Approaches

6.1. Importance of identifying solutions

Whilst Section 5 of this Paper sets out ‘avoidance options’ at a macro scale, there will still be an expectation that solutions are identified within the affected areas themselves. Further research will be undertaken by officers in regards potential mitigation measures, however an outline of some initial outcomes follows below. Consideration will be given to introducing dedicated local policies for the areas affected and as such will require denoting on the Proposals Map.

It is important to note that the rLDP will only be part of the solution. In this regard, with a view to reviewing the risks facing the Council, there will be some matters which are outside the influence and scope of the Planning Service and indeed the Council itself. The scale of the issues, both in terms of spatial extent and cross agency responsibility, are likely to mean that a multi partnership approach will be required at a landscape scale – e.g., Memorandum of Understanding (MoU).

In terms of limitations and to appreciate the scale of the issues facing the Council, reference is drawn to the position in the Brecon Beacons National Park. A report (ENC7Item 8) submitted to the [Planning, Access and Rights of Way Committee on Tuesday, 26th January, 2021](#) summarised the issues faced and these would be of relevance to Ceredigion also. Of particular note within the [Cover Report](#) is the following extract:

“3.1 Restricting new planning permissions will only ever have a minimal impact on meeting phosphate targets and bringing the designated features back into favourable condition; significant factors that are largely outside the scope of planning control can have a much greater impact. Unfortunately, the situation has not been arrested sooner and we are uncertain as to how long ‘legacy phosphates’ and phosphate loading introduced by uncontrolled activities will mean that new permissions will need to be restricted. This may include certain agricultural developments that are submitted via the ‘prior

notification' procedure. At the very least, it is likely that 'prior approval' will be required in most circumstances to allow for the relevant assessments to take place. Officers are considering the potential impacts on other forms of permitted development, including homeowners' rights to extend and make alterations to their property.

3.2 It is likely that a concerted cross-sector, landscape-scale effort to improve environmental quality and sectoral practices alongside regulation and enforcement will be required to improve water quality and build the ecological resilience of the River Wye so that the designated features it supports are returned to favourable condition. We are members of the River Wye Nutrient Management Plan Board, its technical advisory group, and the Wye Catchment Partnership. Despite the best efforts of these bodies (and others) over the last 10 years, the issue is yet to be resolved.

3.3 Although a very difficult task, establishing the evidence-base, modelling and monitoring indicators needed to demonstrate environmental and ecological capacity to accept the loading of new development must be a priority.

3.4 The letter received from NRW and its enclosures were sent to agents on 21 December 2020, with a commitment to meeting with them in the near future. Officers have also been asked if they can contact those to whom pre-application advice has been given during the previous 6 months to alert them to the issue. A high-level meeting between representatives of the National Park Authority and MP's took place on 8th January. A verbal update on any developments regarding the issue can be provided at PAROW.

3.5 The development of landscape scale nature-based solutions to the issues identified within this report will be a matter for investigation within the next iteration of the Management Plan. This will take concerted partnership working with a range of stakeholders not least, NRW, DCWW and landowners/managers within the affected catchment. The first meeting of such a grouping is scheduled to take place on the 18th of January”.

In noting that the provisions of The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 are not directly related to the LDP, it

further frames the cross sectoral dimension to the issues being faced. Members are therefore asked to note that the Council, as a corporate body, faces challenges in policy terms in terms of reconciling its commitment to nature conservation and its declaration of the climate emergency with the requirement to recognise and support those agricultural and rural communities which form a key component of the social fabric of the County.

Generally, there will be a requirement for strategic avoidance or mitigation solutions. Projects to convert agricultural land to open space/habitat and upgrading of WwTW have been evidenced as the primary success measures in England. It is also worth noting that surface water run-off appears to be emerging as a further phosphate load consideration, arising from garden fertilisers and road salt for example, in relation to protected habitats.

[Reference is made to this website](#)

6.2. Technical Solutions

Immediate Measures

Any measures must be undertaken with full regard to the EU Court of Justice, 2018 ruling known as the ‘Dutch Case’. The judgement ruled that development must cause ‘no detriment’ to water quality. The Dutch case ruling applies to all stages of the planning process, in a catchment where water quality has been identified as an issue. While mitigation is allowed under this ruling the future benefit of mitigation measures cannot be relied upon in an appropriate assessment, where those benefits are uncertain at the time of the assessment. The primary short-term measure that has been employed in English counties to address this is the phosphate calculator. The calculator is used by developers to calculate the phosphate burden of a development, and this information is submitted as part of a planning application. Development is only granted if phosphate neutrality is achieved or if certain and measurable mitigation can be secured. Fallowing of land has been the primary mitigation response in the southern English counties to date. Other developer responses have included private wastewater treatment facilities on the development site, and developer investment in public WwTW. These have been recognised to be cost ineffective and not a viable long-term solution in the South of England. The financial unviability is likely to be more pronounced in the affected catchment areas of Ceredigion due to lower house prices, smaller profit margins, and the need for affordable housing.

Calculation of Phosphate Loading

For each qualifying planning application or LDP development allocation, an estimate of the additional phosphate load can be made. Phosphate loads are estimated on a rate of phosphate produced per dwelling assuming an average occupancy of 2.3 people per dwelling, unless there is clear evidence that a higher or lower number is appropriate for the type of residential development proposed. The phosphate load is calculated on the basis that residential development will be built to the highest water efficiency standards provided for by the building regulations. Each local planning authority will impose a planning condition on all planning permissions for one or more net additional

new dwellings requiring construction to the optimum requirement. Natural England and the Environment Agency have provided evidence to justify this imposition within England.

Short-Interim Phosphate Mitigation Measures

The following mitigation measures have been implemented through a Memorandum of Understanding (MoU) within English Counties e.g. Wiltshire

- i. Diverting Surface Water Flows and groundwater ingress away from the Foul Sewage Network (long term);
- ii. Addressing misconnections (short term);
- iii. Reducing flows to the Foul Sewage Network through water efficiency measures (immediate);
- iv. Silt Traps and small farm wetlands on agricultural land (Short term – implemented in 1-2 years?);
- v. Taking land out of intensive agricultural (arable or grass) production through offsetting (Long-term);
- vi. Change land-use from intensive to Less intensive grass production i.e., dairy and pig farming to cattle (Short term 1-2 years);
- vii. Partnership funding for grant applications e.g., measures 4 and 8 (Short term) – potential for grant funding uncertain;
- viii. Diverting surface water flows and groundwater ingress away from the foul sewage network (Long term).

Mid-long-term measures

Memorandum of Understanding (MoU) – A multi-agency agreement to ensure that development is ‘phosphate neutral’, and therefore will not have adverse effects upon the integrity of the affected SAC catchment area. A MoU describes where the parties will work together to help develop and implement appropriate phosphate controls and mitigation measures.

Nutrient Management Board/Plan – a multi-agency board to identify sources of nutrients that are entering the river and steps that can be taken to manage them. An example of this approach can be seen in Herefordshire. The aim of the plan is to manage nutrients in the affected SAC to enable growth in Ceredigion whilst conserving the river environment. The remit of the board

would be to gather an evidence base, appraise options, and develop a local level action plan.

7. Next Steps

It is considered that the approaches can be framed within a short / medium-term and longer-term timescale.

7.1. Short/Medium Term

The Collaborative Approach

Building on the experiences in Somerset, one of the most important aspects and roles for the Local Authority will be to facilitate discussion between stakeholders. In noting that the discussions may be difficult at times and may consist of contrasting viewpoints, a sectoral or isolated approach is unlikely to prove productive. In this regard, it is recommended that a terms of reference, which includes membership, is established. It is envisaged that there will be a key role for elected representatives to lobby and raise awareness.

The Replacement LDP

Full Council will need to consider the implications of the options and decide upon preferred option. There will also be a need to amend the Delivery Agreement. In the event that withdrawal is identified, consideration will need to be given as to whether site promoters are given an opportunity to demonstrate mitigation ahead of the removal of a site, or whether the site is removed by the Council immediately and it is a matter for the site promoter to demonstrate mitigation can be achieved for the Inspector at Examination. Such approaches are likely to be site specific solutions given that there is a lack of strategic mitigation available. Furthermore, due consideration will be given to providing a policy framework that could enable development to proceed in those impacted areas within the Plan period should a solution be identified pre-2033.

The reality in terms of mitigation is that it has to be evidenced based and robust in terms of demonstrating neutrality.

Development Management

Opportunities are available to utilise some of those solutions set out in Section 6 of this Paper. This includes the principle of a phosphate calculator and the trading of 'credits and debits'. It is recommended that discussions are held

with neighbouring authorities as to their plans and support in resource terms is provided to assist alongside continued work at a national level on the Phosphates Planning Sub Group.

Internal review of council land owned assets should be undertaken to identify opportunities for mitigations – a bid has been submitted by the economy and regeneration team to finance such works, as yet no decision has been made on the funding.

7.2. Longer Term

Follow the Science

Whilst there may be opportunities for mitigation on a site by site / case by case basis, it is clear that a high-level strategic approach to mitigation will be required longer term. In order to facilitate this, regional and pan Wales approaches should be adopted through shared approaches and integrated working.

A Nutrient Management Board as utilised in English affected areas may be established with responsibility for producing and monitoring a Nutrient Management Plan for the affected areas.

Given the levels of expertise required, the procurement of specialist to advise will be sought, both in terms of identifying area specific solutions and legal advice to ensure that the LA is fulfilling its duty in this growing and complex area. As such whilst the Councils can work together to frame this work, it is hoped that funding can be provided by the Welsh Government. The appointment of such specialist knowledge may also be sought in developing and implementing the short/medium term approaches.

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

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

An integrated tool to inform effective decision making



		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

The LDP contributes to and helps deliver all four of the Council's corporate priorities:

- Boosting the Economy;
- Investing in people's futures;
- Enabling individual and family resilience;
- Promoting environmental and community resilience.

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.

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.

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.

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:

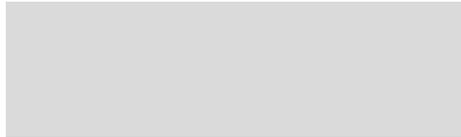
- *Quantitative data - data that provides numerical information, e.g. population figures, number of users/non-users*
- *Qualitative data – data that furnishes evidence of people's perception/views of the service/policy, e.g. analysis of complaints, outcomes of focus groups, surveys*
- *Local population 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> <i>You need to consider how might the proposal impact on equality protected groups in accordance with the Equality Act 2010?</i> <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> 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.
(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).

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.
How will you monitor the impact and effectiveness of the proposal?

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		