

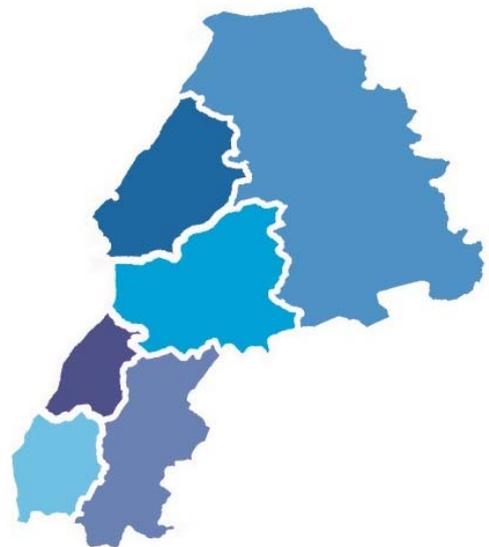


Allerdale Borough Council



Allerdale Local Plan (Part 2) Site Allocations

Sustainability Appraisal
Post Adoption Statement
22 July 2020



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Introduction

The Allerdale Local Plan (part 2) (ALPP2) was adopted on 22 July 2020. It forms part of the overall development plan for the area of Allerdale outside the National Park and will sit alongside the Local Plan (part 1) which was adopted in July 2014. The Local Plan (part 2) will inform many aspects of development up to 2029. In particular it identifies land for housing, employment and retail development, important areas of open space and green infrastructure networks. It also includes policies on affordable housing, tourism and wind energy. The Local Plan (part 2) supports the delivery of 5471 homes and 54 hectare of employment land during the plan period.

Why has this statement been produced?

Sustainability Appraisal (SA) is a requirement of the Planning and Compulsory Purchase Act 2004. It also incorporates the requirements of the EU Directive 2001/42/EC to undertake a Strategic Environmental Assessment (SEA). SA considers the environmental, economic and social effects of implementing the Plan, and reasonable alternatives, with the purpose of promoting the objectives of sustainable development and ensuring their integration within the plan making process.

The purpose of this statement is to present the information required to meet the SEA regulations, outlined below, and show how the development of the Local Plan (part 2) has maximised the contribution the Plan makes to sustainable development and minimises any potential adverse impacts.

This statement will address the following:

- How environmental considerations have been integrated into the plan or programme
- How the environmental report has been taken into account
- How opinions expressed through public consultation have been taken in to account
- The reasons for choosing the plan or programme as adopted, in light of other reasonable alternatives, and
- The measures that are taken to monitor the significant environmental effects of the implementation of the plan or programme.

How environmental considerations have been integrated into the plan or programme

The purpose of the SA was to assist in preparing the ALPP2 by identifying the key sustainability / environmental issues facing the plan area, to predict what would be the likely effects of the ALPP2 on these issues and feed into the development of the ALPP2. The aim was to ensure the Plan has as many positive effects as possible and that negative effects are avoided or mitigated as far as reasonably possible.

The SA was undertaken iteratively, such that at each stage of the ALPP2's preparation an assessment of the sustainability and environmental effects of the options for the Plan and subsequently how sites were selected and policies developed was embedded in the process. A SA report was produced to describe the approach taken, identify the likely effects and measures to avoid or minimise those negative effects. In this way, environmental and sustainability considerations were integrated into the Plan as it was developed.

The environmental and sustainable effects of the ALPP2 were described, analysed and compared through the use of a set of SA objectives. The SA objectives were developed during the Scoping stage of the SA process, drawing on a review of relevant European, national and regional policies, plans and programmes and the objectives they contained. The resulting SA 'framework' comprised 16 SA objectives that were used to decide whether the ALPP2 would be likely to achieve each objective and a further subset of indicators that were applied to the site selection criteria that were also used in stage 2 of the site selection methodology (2014). This ensured that the plan making decisions and the SA were closely aligned.

Finally, the ALPP2 was also subject to Habitats Regulations Assessment (HRA). The purpose of the HRA is to assess the impacts of a land use plan against conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process was undertaken separately from the SA but the findings of the HRA did inform the SA, particularly in relation to judging the potential effects on SA objective EN1

Similarly other pieces of evidence base such as the Strategic Flood Risk Assessment and heritage assessments help to inform the SA process.

How the environmental report has been taken into account

The Environmental Report has been updated alongside each iteration of the Plan. The policy options and potential site allocations have all been appraised against the SA framework and the likely effects of the Plan and alternatives documented. The findings of the SA fed into final site selection and changes to policy wording and requirements to address identified issues and deliver mitigation.

In undertaking the SA at the same time as the plan preparation the Authority has been able to integrate the findings of the appraisal into the Plan prior to each

consultation stage, starting from preferred option through to main modifications. Views on the content and findings of the SA were invited as set out below.

The SA report and Addendum was submitted to the Secretary of State and was reviewed by the Inspector as part of the Examination process.

How opinions expressed through public consultation have been taken in to account

SA Scoping

Prior to the production of the first iteration of the Local Plan (part 2) the SA scoping report was produced and consulted on between September and November 2013. Consultees included Natural England, Environment Agency and Heritage England along with other interested parties.

The Scoping Report provided the opportunity to feedback on a number of issues including the scope of the plans and programme review, baseline data, scope of sustainability issues and the SA objectives and indicators.

Following the consultation the comments were used to finalise the scoping report and the SA Framework which was then used in the development of the Local Plan (part 2). A final Scoping Report was published in June 2014. This included in section 9 a summary of the comments received and how the Scoping Report had been amended in the light of these comments.

Preferred Options

The Preferred Options of the Local Plan (part 2) was published for consultation between January and March 2017. The proposed preferred options had been subject to SA and findings of this appraisal were published alongside the ALPP2 preferred options. Comments were invited from statutory consultees and other interested parties on the SA at the same time as the ALPP2. Consultation responses to the SA report were published in appendix 4 of the Pre submission SA report, including how the matters raised were addressed by the SA. The comments included the need to take account of the recent designation of the Allonby Marine Conservation Zone, use of supplementary evidence on potential impact on heritage assets and using consultation responses to add to the baseline data and knowledge in the SA assessment.

Pre-Submission Draft

The Pre-submission draft ALPP2 underwent public consultation from 5 October to 16 November 2018. A SA had been undertaken of the Pre submission draft plan and the SA report was published for comments at the same time. All responses 'duly made' were submitted to the Secretary of State for consideration by the Planning Inspector during the Examination. No comments were received in relation to the SA.

Proposed Main Modifications

Following the Examination hearings a schedule of main modifications were published for consultation from 5 October to 16 November. The consultation included an addendum to the SA which assessed the proposed modifications using the same methodology as previous stages. No comments were received in relation to the SA.

The reasons for choosing the plan or programme as adopted, in light of other reasonable alternatives

The SEA Regulations require the likely significant effects of implementing a plan or programme and reasonable alternatives to it to be examined, as well as the rationale for identifying reasonable alternatives to be described.

During the development of the ALPP2 reasonable policy options/alternatives were identified, where possible, and subject to SA. The findings of the assessment were presented in the SA reports that were published for comment at the Preferred Options and Pre submission draft stages. Examples of reasonable policy alternatives included varying policy development thresholds for providing affordable housing, mixture of different housing tenures, thresholds for requiring the application of M4 (2) and (3) of the Building Regulations to all or a proportion of housing development. A number of alternatives were considered in designating an area suitable for wind energy. This included a blanket single designation, introducing a buffer to the National Park and the limitation of turbine size in more sensitive landscapes. The assessment of reasonable policy alternatives is set out in appendix 3 of the SA report.

To establish reasonable alternative sites for each of the settlements a three stage sieving process was applied. All sites submitted in the 'Call for Sites' exercise were screened at stage 1, discarding sites for example there were incompatible with the spatial strategy or located in a high flood risk area. Sites that progressed to the second stage were assessed using the SA framework indicators. All sites considered in stage two progressed to the next stage. The third stage involved a more detailed appraisal of these reasonable options to arrive at a list of 'Reasonable Alternatives' The Reasonable Alternatives were assessed consistently using the SA framework and the likely positive and negative effects of each are described in the SA report.

The criteria use to assess the sites at each stage is set out in the site selection methodology document (June 2014). Sites that were discarded at stage 1 are listed in table 12 of the full SA report. The results of the assessment of stage 2 can be found in appendix 2 of the full SA report. Sites discarded at Stage 3a are listed in Table 14 of the full SA report. The findings of the SA for each reasonable alternative are set out in Stage 3b. The consistent use of the SA Framework across all reasonable alternatives and the presentation of the results enabled a clear comparison to be made between alternatives in terms of the likely significant positive or negative effect of choosing a particular option.

The Plan and SA process has been developed through an iterative process, with the Council evaluating and integrating the findings of the various stages of the SA into policy and site allocation development. Comments made through the consultation have also been taken into consideration at each stage of its preparation.

The findings of the SA were not the only consideration when determining the content of the Plan. A key element in developing the Plan was achieving a balance between the aims of meeting housing needs and facilitating economic growth against the need to protect and enhance Allerdale's natural, built and historic environment. As a result of this the SA did identify potential positive and negative effects regarding both policies and site allocations and their reasonable alternatives. The outcome of the SA was not the sole reason why a particular alternative was chosen but was one of a number of tools that informed the Council's final option selection.

The SA recommended mitigation measures to overcome negative effects and to enhance positive effects. The Council has taken this into consideration when developing the Plan. The Plan also includes a range of Development Management and site specific policies that aim to support and promote sustainable development (social, economic and environmental) in Allerdale and contribute towards mitigating potential negative effects.

The measures that are taken to monitor the significant environmental effects of the implementation of the plan or programme

The SEA Regulations require that *“the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”*

A number of policies and site allocations could have potential positive and negative significant effects on the SA objectives. Therefore, monitoring will be undertaken to determine whether these effects do indeed occur due to the implementation of the Local Plan.

The table below sets out the proposed framework for monitoring the likely significant effects of implementing the adopted Local Plan as a whole. These indicators reflect the monitoring framework for the Local Plan itself as the data collected will also be relevant to understanding sustainability effects in many instances.

Monitoring of the significant effects of implementing ALPP2 will be undertaken through the Annual Monitoring Report.

S1 - Presumption in Favour of Sustainable Development	N/A	Meeting the objectives within the Local Plan.
S2 - Sustainable Development Principles	N/A	Meeting the objectives within the Local Plan.
S3 - Spatial Strategy and Growth	Net amount of housing and employment developments.	For housing development: 304 dwellings pa For employment development: equiv. to 3> hectares pa
		Maintain a supply of readily available land: 5 yrs. supply for housing development 15> ha for employment development
	Location and distribution of housing and employment developments.	Meeting of targets outlined within policy.
S4 - Design Principles	N/A	N/A
S5 - Development Principles	Scale and location of development. Level of development outside settlement limits.	Development should be in alignment with the spatial strategy
S6 - Area Based	Locality specific outcomes	Meeting of specific outcomes (where appropriate).
S7 - A Mixed and Balanced Housing Market	Signs of a balanced housing market (covered through the other housing indicators)	Decrease in the number of Long Term Empty properties.
	Housing delivery by type	The housing mix should broadly reflect the local evidence
S8 - Affordable Housing	Net delivery of affordable dwellings.	Net affordable housing requirement: Workington and Maryport HMA: 106 units pa Wigton HMA: 36 units pa Cockermouth HMA: 39 units pa
	Tenure split of addition affordable provision (gross).	Tenure split according to policy: 75% socially rented and 25% intermediate (LCHO)

	Number of schemes (over the threshold) considered unviable and justifying a lower affordable housing contribution or tenure mix.	N/A
S9 - Rural Exceptions Sites	Number of rural exception affordable dwellings.	N/A
S10 - Elderly Needs Housing	Development by location and type of facility.	Contribute to targets set in current and emerging strategies.
	Percentage of residential development that accords with Lifetime Homes Standards and amount of specialist accommodation delivered	N/A
S11 - Gypsy, Traveller and Travelling Showpeople Sites	Number of gypsy and traveller pitches	Contribute to targets set in current and emerging strategies, and evidence base.
	Number of travelling showpeople plots	
	Number of unauthorised site in relation to gypsy, traveller and travelling show people.	N/A
S12 - Land and Premises	Area of Land Available by location and type	N/A
	Amount, location and distribution of employment developments.	Meeting of targets outlined within policy. - Employment development: equiv. to 3> hectares pa
S13 - Energy Coast Innovation Zone	Economic Context -General economic statistics such as; employment, productivity, job creation, growth in key sectors.	N/a
	Progress towards delivery of the West Cumbria Economic Blueprint	N/a
	Development of key sites	
	Delivery of important infrastructure	N/a
S14 - Rural Economy	Number of rural enterprises.	Increase or maintain current number of enterprises in rural areas (particularly small and medium size uses).

	Employment floorspace by location.	N/A
	Number of “live work” and “work hub” developments.	N/A
S15 - Education and Skills	Development of Education related floorspace	N/A
	Level of NVQ (or equivalent).	N/A
	% of businesses that consider lack of skills an issue when recruiting.	N/A
	Capacity of existing education facilities	No identified capacity issues
S16 - Town Centres & Retail	Location and quality of “town centre” development.	Majority of development focused within town centres and directed to the Principal Centre, with appropriate level of development in other settlements reflective of their function and role within the hierarchy.
	Town Centre Vacancy rate	N/A
	Loss of ground floor A1 units in Primary Frontages (number)	
S17 - Tourism, Coastal & Countryside Recreation	Visitor Numbers	Increase in visitor number and revenue and tourism related employment.
	Development of tourism, cultural and leisure developments by location.	Development should be concentrated in the Principal, Key and Local Service Centres.
	Removal of occupancy conditions for holiday accommodation.	N/A
S18 - Derwent Forest	Masterplans / development proposals at “Derwent Forest” site.	N/A
S19 - Renewable Energy and Low Carbon Technologies	Location, type of renewable developments and total installed capacity.	N/A
	Development giving rise to environmental health complaints/enforcement, post construction	
S20 - Nationally Significant Infrastructure Projects	N/A	N/A

S21 - Developer Contributions	Amount of contributions and area of spending. Including Section 106, Section 278 and Community Infrastructure Levy (if adopted).	Meeting of objectives within “Economy”, “Housing”, “Built Environment” and “Natural Environment” chapters.
S22 - Transport Principles	Location and accessibility of new residential developments	High level of accessibility should be achieved, in particular through public transport, cycling, walking or “composite mode”.
	Rural Transport Schemes	N/A
	Parking standards	Meeting of standards
	Level of developer contributions on transport initiatives and schemes	N/A
S23 - Supporting and Safeguarding Strategic Infrastructure	Progress against strategic documents such as Local Transport Plan, West Cumbria Economic Blueprint Implementation Plan, and other utility and infrastructure suppliers.	Delivery of projects
S24 - Green Infrastructure	Progress against projects and objectives identified in the “Green Infrastructure Study”.	N/A
	Amount of contributions on “green infrastructure”.	N/A
S25 - Sports, Leisure and Open Space	Loss of key sports and recreational facilities and spaces.	Any loss of such facilities should be compensated by replacement space / facilities in the locality.
	Amount of contribution spend on open spaces, sports and recreational facilities.	N/A
	Planning permissions granted contrary to advice on conservation (inc. English Heritage, Conservation Officer).	None
S26 - Community & Rural Services	Delivery/Loss of new Community facilities	Protection/Enhancement to Services and Community Facilities
S27 - Heritage Assets	<ul style="list-style-type: none"> - Improvement to heritage assets – Number of designated heritage assets at risk - Number of developments given consent against English Heritage advice 	<ul style="list-style-type: none"> - N/a -Year on year reduction -Zero

S28 - Hadrian's Wall World Heritage Site	Progress towards objectives as adopted World Heritage Site Management Plans	N/A
S29 - Flood Risk and Surface Water Drainage	Residential and economic developments on land of high flood risks (zones 3 & 2).	None in zones 3 & 2 (unless robustly justified)
	Planning permissions granted contrary to advice of the Environment Agency.	None
	Number of SuDs schemes installed	
S30 - Reuse of Land	Development on previously developed land / brownfield sites.	There is no specific target; however, development should in the first instance seek to where possible make use of PDL.
S31 - Reuse of Rural Buildings	Reuse of rural buildings.	N/A
S32 - Safeguarding Amenity	Percentage of development approved contrary to Environmental Professional advice.	To minimise harmful impacts from development to residential amenity.
	Development requiring EIA.	To refuse, mitigate or compensate any harmful impacts from development on the environment.
S33 - Landscape	Number of major applications in sensitive landscapes	To minimise harmful impacts from development on landscape character
S34 - Development in the Solway Coast AONB	Development on Solway Coast AONB, Hadrian's Wall World Heritage Site.	N/A
S35 - Protecting and Enhancing Biodiversity and Geodiversity	Development on Sites of Special Scientific Interest, Special Areas of Conservation and Special Protection Areas.	None
	Measures to promote / protect biodiversity on site (e.g. management agreements, additional habitats, etc.).	N/A
	Amount of contributions towards biodiversity enhancement and protection.	N/A
S36 – Air ,Water and Soil Quality	Developments requiring EIA	To protect and / or improve air and water quality and to protect soil quality.

S37 - Shoreline Management and Coastal Development	Development in Coastal Change Management Area.	No new residential development should be permitted (replacement dwellings only) Proposals for new community facilities, commercial and business uses will only be permitted in exceptional circumstances.
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