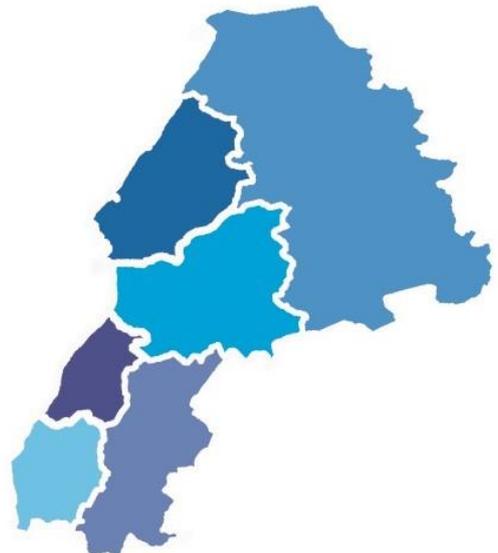




Allerdale Local Plan (Part 2) Site Allocations

Main Modifications Sustainability
Appraisal Addendum

September 2019



Non-Technical Summary

Introduction

Sustainability Appraisal (SA) is a way of considering the social, economic and environmental sustainability effects of Local Plans. It identifies the likely significant effects of plans and assesses what the impacts would be of other alternative options to what is being put forward in the plan. Its aim is to help avoid and manage negative effects of plans and to maximise their positive impacts.

SA of the Local Plan is a legal requirement. This SA Addendum Report appraises the impacts of the proposed changes (main modifications) to the Allerdale Local Plan (part 2) (ALPP2). Following the examination hearings in May 2019 a number of changes have been put forward to ensure that the Plan can be found 'sound' by the Planning Inspector and can be adopted by the Council. These changes are being consulted on alongside this SA Addendum Report. The ALPP2, once adopted, will provide allocated sites for housing, employment and retail as well as planning policies to help the Council assess development proposals.

Method

This SA Addendum report builds on the previous Final SA Report of the ALPP2 to look at how the proposed changes since the Plan was submitted for examination may impact on its environmental, social and economic effects. It uses the same method and framework that has been used in the previous SA work throughout the preparation of the ALPP2.

The report screens each of the Main Modifications to assess how the change could alter the sustainability impacts of the policies and the Plan as a whole.

Conclusion

The proposed Main Modifications relate to the detailed wording of the policies and the removal of two allocations. The changes do not alter the main intent of the policies or the objectives of the ALPP2. For this reason, and following screening and re-appraisals of the modified policies it has been concluded that the Main Modifications do not significantly affect the findings of the previous SA Report, nor do they give rise to significant environmental impacts.

Introduction

The Allerdale Local Plan (part 2) was submitted to the Secretary of State for independent Examination on 18 January 2019. It was accompanied by a Sustainability Appraisal report.

This Addendum to the Sustainability Appraisal (SA) reviews the Main Modifications to the Allerdale Local Plan (part 2). The Main Modifications were proposed following hearings in May 2019. These modifications have not been subject to a sustainability appraisal and therefore are reviewed within this addendum.

The SA of the Main Modifications follows the same methodology as before. An initial screening of the Main Modifications was carried out to identify if the policies had been modified enough to require a full re-appraisal (appendix 1). Government Guidance states that where Main Modifications have not already been subject to SA only those which are likely to have a significant effect should be appraised.

The Council has assessed the proposed minor modifications and concluded that further Sustainability Appraisal is not required.

This document forms part of the consultation on the proposed Main Modifications and representations can be submitted in relation to this SA addendum report as well as on the Main Modifications. Comments on the SA addendum report and Main Modifications must be submitted in writing, using the appropriate comments form, by no later than **4pm on Friday 1 November 2019** to siteallocations@allerdale.gov.uk or Planning Policy, Strategy, Policy and Performance, Allerdale Borough Council, Allerdale House, Workington CA14 3YJ.

Further details on the consultation, including comments forms, can be viewed on and downloaded from the Council's website www.allerdale.gov.uk/siteallocations

Sustainability Appraisal Framework and Methodology

Introduction and Overall Approach

The focus of the SA at this stage is on the proposed main modifications. However, consideration is also given to the effects of the whole ALPP2 as modified, by considering the cumulative effects of the proposed modifications together with the rest of ALPP2 as submitted. The Sustainability Appraisal of the main modifications was undertaken in two stages. Firstly, each of the main modifications was assessed to determine whether an additional appraisal was required, by considering the scope and content of the proposed modifications, whether they could give rise to significant effects, and how they differ from what has previously been subject to sustainability appraisal at earlier stages of plan making. The screening exercise is set out in appendix 1 of this report.

The Planning Practice Guidance (PPG) advises that modifications to the SA should be considered only where appropriate and proportionate to the level of change being made to the Local Plan. It goes on to advise that further assessment may be required if the changes have not been previously assessed and are likely to give rise to significant effects. The PPG is clear in stating that changes to the Local Plan that are not significant will not require further SA work. If the Local Planning Authority assesses that necessary changes to the Local Plan are significant, and were not previously subject to sustainability appraisal then further SA maybe be required and consulted on.

Where it was determined that additional SA work was required the appraisal was undertaken using the SA framework used in the SA report submitted alongside the ALPP2 as set out below.

SA Framework

The SA framework set out below provides the basis for the SA of ALPP2 and main modifications. There are four key topic areas under which a set of sustainability objectives sit. Within each objective there is a series of sub-questions to guide the appraisal process.

Sustainability Appraisal Objective	Sub-Objective(s)	Appraisal Question(s)	Potential Indicator(s)
<ul style="list-style-type: none"><i>Social progress that meets the needs of everyone</i>			
SP1 – To increase the level of participation in the democratic	Increase community involvement and participation in	<ul style="list-style-type: none">Will it help / encourage participation in the democratic	<ul style="list-style-type: none">Proximity to village hall, civic building or community centre

process	the democratic process	process?	
SP2 – To improve access to services and facilities, the countryside and open spaces	Improve accessibility to key services and facilities	<ul style="list-style-type: none"> • Will it improve access to shops and services and / or help retain essential local facilities? • Will it improve access to the Green Infrastructure network? • Will it result in a loss of open space? 	<ul style="list-style-type: none"> • Proximity to shop • Proximity to community facility (e.g. pub, post office) • Proximity to cycle route; • Proximity to amenity green / recreational open space • Proximity to Public Right of Way (PROW);
	Improve access to green infrastructure, open space and the wider countryside		
SP3 – To provide everyone with a decent home	Ensuring that affordable housing is available to all	<ul style="list-style-type: none"> • Will it contribute to the delivery of affordable housing • Will the occupants be at risk from Hazardous Installations? • Will the occupants enjoy a satisfactory standard of residential amenity 	<ul style="list-style-type: none"> • Distance to PADHI zone • Potential amenity issues and / or proximity to incompatible land uses
	Ensuring the delivery of good quality housing		
SP4 – To improve the level of skills education and	Increase the level of educational	<ul style="list-style-type: none"> • Will it increase the level of participation and attainment in 	<ul style="list-style-type: none"> • Proximity to primary school • Proximity to

training	attainment	education and training? <ul style="list-style-type: none"> Will it contribute to reducing unemployment? 	secondary school <ul style="list-style-type: none"> Proximity to further/higher education facilities
SP5 – To improve the health and sense of wellbeing of people	Ensure accessibility to healthcare services	<ul style="list-style-type: none"> Will it improve access to healthcare? 	<ul style="list-style-type: none"> Proximity to health services / facilities
SP6 – To create vibrant, active, inclusive and open minded communities with a strong sense of local history	Improve sense of community	<ul style="list-style-type: none"> Will it increase the opportunities to engage with others in the community and take part in local activities? Will it increase the opportunity to take part in the arts and cultural activities? Will it promote healthy, active lifestyles? Will it improve access to sports facilities? 	<ul style="list-style-type: none"> Proximity to village hall, civic building or community centre Proximity to amenity green / recreational open space Proximity to cultural facility (cinema, museum, theatre, art gallery, concert hall) Proximity to sports facility / pitch / hall
	Increase participation in arts and cultural activities		
	Provide opportunities for recreation and increase participation in sports		
<ul style="list-style-type: none"> <i>Effective protection of the environment</i> 			
EN1 – To protect and enhance biodiversity	Protect and conserve rare, declining, threatened and indigenous habitats and	<ul style="list-style-type: none"> Will it protect and enhance biodiversity and geodiversity? Will it maintain and enhance 	<ul style="list-style-type: none"> Proximity to internationally designated sites: Special Area of Conservation (SAC), Special

	species	sites designated for their nature conservation interests?	Protection Area (SPA)
	Minimise adverse impacts on species and habitats through human activities and development	<ul style="list-style-type: none"> Will it minimise adverse impacts on species and habitats? 	<ul style="list-style-type: none"> Proximity to nationally designated sites: Sites of Special Scientific Interest (SSSI) Proximity to County Wildlife Sites Proximity to Regionally Important Geological Sites (RIGS)
EN2 – To preserve and enhance landscape quality and character	Protect local landscape quality, distinctiveness and character from unsympathetic changes	<ul style="list-style-type: none"> Will it protect landscape quality, distinctiveness and character? 	<ul style="list-style-type: none"> Proximity to Area of Outstanding Natural Beauty (AONB) Proximity to Lake District National Park (LDNP) Proximity to Hadrian's Wall WHS Proximity to Scheduled Ancient Monument (SAM) Landscape sensitivity
	Protect the character, appearance and setting of world heritage sites (WHS), designated archaeological sites (DAS) and historic parks and gardens (HPG)	<ul style="list-style-type: none"> Will it protect the character, appearance and setting of WHS, DAS and HPG? 	

<p>EN3</p> <p>To improve the quality of the built environment</p>	<p>Conserve features of historic and archaeological importance</p>	<ul style="list-style-type: none"> • Will it protect and enhance the character and appearance of the Borough's historic buildings, conservation areas and designated archaeological sites? • Will development be guided away from areas at high risk of flooding? • Will development be well-related to the existing settlement pattern 	<ul style="list-style-type: none"> • Proximity to Conservation Area • Proximity to Listed building(s) • Proximity to Scheduled Ancient Monument (SAM) • Proximity to high risk Flood Zones • Proximity to high risk Surface Water Flood Zones
	<p>Guide inappropriate development away from flood risk areas</p>		
	<p>Ensure that new development is of high quality, sympathetic to the character of the built environment and strengthens local distinctiveness</p>		
<p>• <i>Sustainable use and management of natural resources</i></p>			
<p>NR1 – To improve local air quality and reduce greenhouse gas emissions</p>	<p>Reduce the need to travel and encourage a switch from private car to public / sustainable transport modes</p>	<ul style="list-style-type: none"> • Will it enable services to be access by cycling or walking and reduce the need to travel? • Will it enable service and facilities to be accessed by public transport? 	<ul style="list-style-type: none"> • Proximity to bus stop • Proximity to train station
	<p>Maintain local air quality and limit the emission of greenhouses gases and</p>		

	other air pollutants, particularly within or adjacent to designated sites		
NR2 To improve water quality and water resources	Minimise the risk of water pollution from all resources	<ul style="list-style-type: none"> • Will it lead to the pollution or lowering of quality a watercourse? • Will it have an adverse effect on water resources? 	<ul style="list-style-type: none"> • Proximity to watercourse • Proximity to Groundwater Source Protection Zone
	Ensure adequate water supply and wastewater treatment infrastructure to support growth		
NR3 – To restore and protect land and soil	Encourage development on brownfield sites and remediate contaminated soils	<ul style="list-style-type: none"> • Will it make reuse of a previous developed site? • Will it involve the remediation of a contaminated site • 	<ul style="list-style-type: none"> • Loss of greenfield site • Reuse of previously developed land
	Minimise the loss of greenfield sites		
NR4 – To manage mineral resources sustainably, minimise waste and encourage recycling	Safeguard identified mineral resources	<ul style="list-style-type: none"> • Will it increase the reuse, recovery and recycling of waste? • Will it protect mineral resources 	<ul style="list-style-type: none"> • Proximity to recycling facilities • Proximity to minerals safeguarding areas • Proximity to high risk coal mining areas
	Increase re-use, recovery and recycling of industrial, commercial		

	and household waste		
<ul style="list-style-type: none"> • <i>Building a sustainable economy</i> 			
EC1 – To retain existing jobs and create new employment opportunities	Increase the number, variety and quality of employment opportunities	<ul style="list-style-type: none"> • Will it increase the number, variety and quality of employment opportunities? • Will it safeguard/enhance key employment sites? 	<ul style="list-style-type: none"> • Loss of key employment land • Development on identified strategic infrastructure route
EC2 – To improve access to jobs	Locate new employment opportunities in the areas of greatest need	<ul style="list-style-type: none"> • Will it lead to the location of new employment opportunities in areas of greatest need? 	<ul style="list-style-type: none"> • Distance/accessibility of employment sites to residential centres • Proximity to locations of highest unemployment
	Increase access to jobs through improved skills and sustainable transport	<ul style="list-style-type: none"> • Will it enable access to employment via public transport • Will it help Borough residents adapt to economic change and obtain new skills and training? 	
EC3 – To diversify and strengthen the local economy	Provide buildings and infrastructure to encourage inward and private sector	<ul style="list-style-type: none"> • Will it help create the right environment and infrastructure to encourage private sector 	<ul style="list-style-type: none"> • Higher employment demand area

	investment	investment?	
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Appraisal of Main Modifications

This section summarises the outcomes of the appraisals of those main modifications that were identified as requiring further assessment. It highlights any particular areas where the modifications have a direct relationship or impact on the sustainability appraisal objectives, and also where they have resulted in a change to the scoring previously assigned in the Final SA Report. The full policy appraisals are contained in appendix 2.

The Council considers that the following main modifications could have potential implications for the Sustainability Appraisal Report, these are:

Policy SA 3 Affordable Housing

The modifications to this policy involve introducing a variable affordable housing requirement across the Plan area. Three zones are proposed 10%, 20% and 40% affordable housing contribution dependent on which zone a scheme is located. The policy threshold remains the same as the submitted policy.

Modifications are also proposed to the supporting text to clarify this policy change, the tenure mix and exceptional circumstances where off site provision would be acceptable.

The modified policy still performs strongly against the social objectives especially providing every one with a decent home and creating inclusive communities. It also has a positive effect in supporting the retention and creation of employment opportunities. In zone A the quantity of affordable homes may be reduced due to the lower policy requirement of 10% however the viability evidence does suggest that a lower requirement is required to ensure delivery. It is considered that the amendments to the policy and supporting text will not have a significant adverse impact on the sustainability of the Local Plan or impact on the full SA report findings

Policy SA5 Housing Standards

Amendments to this policy include introducing a size threshold of 10 dwellings when this policy would apply and reduces the scope of the policy requirement from all dwellings to 20%.

The modified policy still performs well against the social objectives such as to provide everyone with a decent home, creating vibrant and active communities and improving the health and sense of wellbeing of people. However, it performs less

well against those objectives when compared to the submitted policy which required all dwellings to comply with M4 (2). Notwithstanding this it is considered that the proposed amendments will not have a significant adverse effect on the sustainability of the Local Plan or impact on the full SA report findings. .

Policy SA33 Broadband Main Modifications

There are two main modifications proposed to this policy one to the policy wording and one relating to the supporting text. The policy has been amended from requiring that all dwellings have appropriate broadband infrastructure to proposals of 2 or more dwellings. The second element of the policy amendment includes a stepped approach in applying the policy starting with engagement with infrastructure providers, exploring alternative means of provision e.g. satellite and finally if it proves impractical or unviable then the policy requirement is not pursued. The supporting text amendment reinforces the need for early engagement by developers and how developers are expected to evidence this.

The modified policy continues to perform strongly against the social objectives by improving access to services online and thereby indirectly supporting health and wellbeing through social interaction. It also supports economic objectives in terms of retaining and creating job opportunities and helping to diversify and strengthen the local economy. It is considered that the amendments to the policy and supporting text will not have a significant adverse impact on the sustainability of the Local Plan or impact on the full SA report findings.

Consideration of Alternatives

Throughout the preparation of the ALPP2 and integral SA process, a range of options and alternatives have been considered and assessed. The final SA report explains how options and reasonable alternatives have been appraised throughout the process.

At this stage of the Plan preparation and SA assessment, modifications have been proposed to enable the Plan to be found 'sound' by the Inspector. In terms of SA any alternative options should be considered 'reasonable'. At this stage it is not considered that there are any reasonable alternatives to the modifications that are being consulted on.

Conclusion

The SA Addendum has demonstrated that the amendments to the policies proposed in the Main Modifications will not have any significant negative impacts on the sustainability of the Local Plan (part 2). The policies that have been considered to require additional sustainability appraisal have demonstrated that they will not

reduce the sustainability of the Plan and therefore are appropriate to be included in the proposed Main Modifications.