Allerdale Borough Council

Local Plan Pre-Submission Draft

Sustainability Appraisal Non-Technical Summary

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1.0 Introduction

1.1 Background


This SA has been prepared to fulfil the requirements for SA arising from the Planning and Compulsory Purchase Act 2004 and the requirements for Strategic Environmental Assessment (SEA) arising from the SEA Directive. The purpose of SA is to promote sustainable development through better integration of sustainability (economic, social and environmental) considerations in the preparation and adoption of plans. The SEA Directive requires that certain plans and programmes undergo an environmental assessment, due to the likelihood that they will have significant environmental effects when implemented.

The process has broadly followed four main stages to date:

- **Stage A** - Setting the context and objectives, establishing the baseline and deciding on the scope of the SA;
- **Stage B** - Developing and refining plan options and assessing effects. Preparing the initial SA Report(s);
- **Stage C** - Preparing the SA Report; and
- **Stage D** - Consultation on the plan and the SA Report.

It should be noted that revisions to the LDF process have been introduced as a result of the Planning Act 2008 which have removed the requirement for a formally staged approach to consultation on the development of Development Plan Documents (DPDs). As such, Allerdale Borough Council's (ABC's) decision to consult on the Issues and Options stage and the Spatial Options stage can be considered voluntary and best practice. New Government SA guidance\(^1\) confirms that DPDs now need only be accompanied by a single SA Report at pre-submission consultation (Regulation 27) and that this report should detail the full SA process undertaken. However, the SEA Directive and SA guidance still require consideration of the significant effects of alternatives(s). This report forms the report to meet the requirements of Regulation 27.

2.0 Allerdale’s Local Plan

2.1 Background

Allerdale Borough Council is preparing a Local Plan, which will form part of the Council’s Local Development Framework and will replace the current suite of planning policies for the Council area.

The production of the Local Plan has been undertaken in stages, over a number of years. The Core Strategy Issues and Options Report was issued for consultation in 2007. The Issues and Options Paper set out a number of key options and questions related to development in Allerdale borough.

Following the Issues and Options consultation, ABC produced two Discussion Papers containing the Strategic Objectives for the Core Strategy and details of the Spatial Options: ‘From Strategic Objectives to Spatial Options: Discussion Paper 2’ (ABC, 2009) and ‘Spatial Options: Cockermouth and Post-Deluvian Issues: Discussion Paper 3’ (ABC, 2009). As a result of this, the Core Strategy Spatial Options Report was issued for consultation in 2010.

Following a review of the findings of the work undertaken to date, the Core Strategy Preferred Options Report and the Development Management Policies Preferred Options Report were issued for consultation in 2012. These developed the Issues and Options and Strategic Options consulted upon previously and using a range of evidence base material, including the findings of the SA, developed these into preferred options and also highlighted a number of reasonable alternatives that had been considered.

As a result of all the work carried out to date, the Core Strategy and Development Management Policies documents have now been amalgamated into one Local Plan document, the Pre-Submission Draft consultation of which is taking place in 2013 (to which this report relates).

2.2 Allerdale’s Vision and Objectives

In accordance with the Allerdale vision

1. By 2028, Allerdale’s communities will be sustainable, prosperous, safe, healthy and vibrant. The economy will be strong, diversified and well connected, with a growing and highly skilled population, with high employment, capitalising on skills and opportunities in the nuclear, energy and tourism sectors.

2. It will be a place that has adapted to meet the challenges of climate change, has a diverse and extensive network of accessible green infrastructure, unspoilt landscape and coastline and areas rich in biodiversity and geodiversity.

3. It will be a place where all sections of society have access to affordable, well designed homes that meet a range of needs, close to jobs, services and sustainable transport, where historic environments are protected and enhanced and sustainable development, investment and successful regeneration has created prosperous towns supported by sustainable rural communities.

4. Workington will have retained and enhanced its role as West Cumbria’s principal residential, educational, leisure, cultural and commercial centre. Taking advantage of its port and rail links it
will have been a focus for major development delivering a stronger employment base, housing renewal and greater choice of housing as well as a vibrant town centre with an expanded night time economy.

5. **Maryport** - will have enhanced its role as a key residential, employment and visitor centre, ensuring deprivation has been reduced significantly. The town will be a key tourist destination building on its harbour, coastal location, rich Roman and Georgian heritage and environmental assets.

6. **Cockermouth** - will have retained its vibrant town centre and high quality historic environment. The housing market will be more balanced with greater access to affordable housing and wider job opportunities. The town is resilient to the risk from flooding through the delivery of appropriate infrastructure.

7. **Wigton** - will have developed its role as an important housing, commercial, employment and educational centre in North Allerdale. In particular the role of the town centre and the condition of its historic fabric will have been enhanced, meeting the retail and service requirements of its catchment population.

8. **Silloth** - will have an enhanced tourism sector having capitalised on its close proximity to the Solway Coast AONB and its historic environment. The role of the **Port of Silloth** will be maintained and enhanced, while the local community will have a more balanced age structure, with greater access to employment and services.

9. **Aspatria** - will have enhanced its role as a key centre serving its rural hinterland by offering a greater mix of housing, employment and tourism opportunities, making greater use of rail links and providing a range of services.

10. **Rural Areas** - will be made up of thriving, sustainable communities with improved access to employment opportunities and greater diversity in the local economy. Availability of affordable housing will have increased and existing services will have been retained and in places enhanced, whilst at the same time, the quality of the local environment and biodiversity assets has been protected and enhanced.

**Climate Change and Sustainability**

**SO1a** Reduce Allerdale’s carbon footprint and support a low carbon future.

**SO1b** Ensure a comfortable, resilient and liveable environment across Allerdale by ensuring development adapts to, and mitigates the effects of climate change.

**SO1c** Focus major development in Workington and encourage complementary and additional development in Key Service Centres of Maryport, Cockermouth, Wigton, Silloth and Aspatria. Small-scale development will be supported in Local Service Centres with appropriate facilities.

**SO1d** Ensure the sustainability of towns and villages by supporting a stable and balanced population, ensuring accessible services that meet a range of community needs.
SO1e Support and encourage construction methods that seek to reduce energy consumption, use renewable energy sources, minimise waste and encourage recycling.

SO1f Promote renewable and low carbon energy production in the Plan Area.

SO1g Sustainable and effective use and re-use of land and buildings and protect the most versatile agricultural land from development.

Housing

SO2a Enable a balanced housing market that delivers a mix of housing type and tenure to meet the needs of all communities.

SO2b Support housing renewal and re-use of empty properties.

SO2c Ensure a deliverable supply of housing land that meets the needs of the community and local economy.

SO2d Increase access to affordable housing as part of housing developments and rural exception sites.

SO2e Support independent living for older people and people with disabilities by ensuring housing is adaptable for changing and varied needs.

Economy

SO3a Diversify the urban and rural economic base of Allerdale to enable a prosperous mixed, low carbon economy, including creative knowledge based industries, specialist engineering, energy and tourism sectors.

SO3b Encourage the development of business clusters, maximise the economic opportunities identified in the West Cumbria Economic Blueprint and implementation plan and ensure the timely improvement and delivery of essential infrastructure, such as the Port of Workington to support economic growth.

SO3c Promote Lillyhall as an important employment site, encouraging the growth of nuclear technology and research clusters while building on its existing education and skills role through the Energy Coast Campus.

SO3d Provide a wide range of modern, high quality employment sites and premises to meet existing business needs and emerging sectors.

SO3e Support opportunities for home working, creation of rural enterprise hubs for start up businesses and proposals that contribute to farm diversification.

SO3f Support improved digital connections, especially in rural areas.

SO3g Support the development of further and higher education in the Plan Area and improve educational attainment and skills to meet the needs of existing and future employment opportunities.

SO3h Promote the principles of sustainable tourism, the provision of high quality accommodation and attractions, and support key projects such as the Frontiers of the Roman Empire (Hadrian’s Wall) World Heritage Site (Hadrian’s Wall World Heritage Site), Derwent Forest, and Roman Maryport.
SO3i Promote the vitality and viability of town centres, including the night time economy and support the retention of existing rural services.

SO3j Enable the long-term sustainability of the ports at Workington and Silloth by supporting appropriate port related activities and lobbying for improved road and rail links.

Transport

SO4a Locate the majority of development in locations that are accessible by a variety of modes of transport, particularly public transport, walking and cycling and reduce the need to travel.

SO4b Support essential road and rail infrastructure improvements required to deliver economic growth and key economic projects.

SO4c Work with partners to improve sustainable transport, both within and outside Allerdale.

SO4d Improve sustainable access to jobs, services, education, leisure opportunities and the wider countryside.

SO4e Develop and maintain safe, efficient, high quality, modern and integrated transport networks with good internal links and connections to key routes including A595/6 corridor, A66, M6, and West Coast mainline.

SO4f Enable the delivery of transport hubs across the Plan Area, linking the Cumbria Coastal Railway to other transport modes.

SO4g Promote the role of Workington and Silloth ports as an alternative means of accessing the area for both business and visitors.

Built and Historic Environment

SO5a Ensure that all new development meets high standards of quality of design, energy efficiency, safety, security and accessibility, and relates well to existing development, enhances the public realm and develops locally distinctive quality places.

SO5b Conserve and enhance both non-designated and designated heritage assets and their settings, including the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site (Hadrian's Wall World Heritage Site), and where possible seek the opportunity to enhance and better reveal significance.

SO5c Protect and enhance existing social, community and utility related infrastructure, such as education, health, arts, cultural and leisure facilities.

SO5d Enhance green infrastructure by developing a comprehensive network of high quality open space such as parks, woodlands, gardens, natural green spaces and allotments.

SO5e Minimise the risk from flooding and support the incorporation of mitigation measures as part of the overall design solution.

SO5f Protect and enhance the quality of the environment and amenity.
Natural Environment

SO6a Protect and enhance the natural and historic landscape, including ancient woodland and geological assets, from unnecessary and harmful development, particularly within the Solway Coast AONB and areas adjoining the National Park.

SO6b Protect and enhance biodiversity and geodiversity, notably the Natura 2000 sites and create ecologically diverse habitats across Allerdale and ensure the ability of habitats and species to adapt to climate change.

SO6c Promote opportunities to improve access to the countryside and coast.

SO6d Ensure high levels of water and air quality are retained and where necessary improved, and safeguard agricultural land.

SO6e Promote, protect and provide a comprehensive network of green infrastructure, incorporating multi-functional green and blue spaces both within developments, and linking across and between settlements throughout the area.

The Allerdale Local Plan contains a set of policies developed to implement its vision and objectives.
3.0 SA Scoping

3.1 Sustainability Baseline

Allerdale is located in North West Cumbria in North West England and covers approximately 1,258km². As of 2011, Allerdale had a population of 94,300 with the main populations concentrated within the towns of Workington, Maryport and Cockermouth, and the three other supporting settlements of Wigton, Silloth and Aspatria. This local plan concerns the area of Allerdale Borough outside the boundary of the National Park.

The Borough is one of contrasts. The major centres of population are located in the south of the Borough, with the settlement patterns more concentrated than anywhere else in the Borough. The economic and social history of this area is dominated by coal mining and iron and steel making, the decline of which has left its legacy of economic and social problems. By contrast, the rural hinterland, close to the boundary of the Lake District National Park, is characterised by a large number of rural villages which are subject to
development pressure. The north of the district is predominantly rural with only a handful of substantial settlements. Agriculture and tourism play a key role in this area, with the Solway coast and National Park being important tourist destinations.

3.2 **Key Sustainability Issues**

The review of baseline data set out all of the key characteristics and information relating to environmental, social and economic conditions in the Borough which resulted in the determination of a series of key sustainability issues for the Borough, which are set out below:

**Economic Issues**

- Diversify the local economy/ bring in new investment and generate higher paid jobs.
- Reduce the disparity between the more deprived areas within the Borough and the more prosperous areas.
- Encourage the establishment of research and development institutions.
- Reduce the widening regional disparities in wealth, reflected in the low level in Growth Value Added.
- Ensure that sustainable economic development occurs in the right place at the right time.
- Address the poor accessibility to the national transport networks.
- Ensure the viability and vitality of key centres.
- Widen the skills base.
- Long term and structural unemployment.
- Ensure protection and enhancement of the built/ historic environment.
- Protect and enhance landscape and biodiversity as a resource for the natural economy.

**Social Issues**

- Access to affordable and balanced housing markets.
- Vacant and derelict properties.
• Access to services and facilities in rural areas.
• Reduce the need to travel.
• Inadequate public transport in rural areas.
• Reliance on private car.
• Loss of young people, particularly graduates.
• Areas of significant deprivation.
• Poor levels of health in deprived areas.
• Reduce the fear of crime.
• Improve access to green spaces and the countryside.

**Environmental Issues**

• Protect and enhance natural resources, biodiversity and geodiversity.
• Conservation and enhancement of the character and quality of the landscape.
• Energy efficient development.
• Restore and protect land and soil
• Protect local distinctiveness and enhance townscape character.
• Protect and enhance Conservation Areas, Listed Buildings, Scheduled Monuments and their settings.
• Promote the use of renewable energy resources and water efficient design in new developments.
• Reduce the risks from flooding
• Protect and improve water quality and conservation
• Management and maintenance of landscape and heritage
• Encourage renewable energy and energy efficiency and reduce the need to travel.
• Encourage the recycling of waste by the provision of facilities in new development.
• Protection of good grade agricultural land
• Encourage renewable energy and energy efficiency and reduce the need to travel.
• Effects of global warming and rise in sea levels.

3.3 Sustainability Appraisal Framework

The Sustainability Appraisal Framework is a key tool in completing the SA as it allows the assessment of the effects arising from the Local Plan proposals in key areas in a systematic way. An SA Framework containing objectives and associated indicators was jointly developed with the other planning authorities in the Cumbria sub-region. The Framework was based upon the baseline information and key sustainability issues derived from earlier work on the Allerdale SA. This process was informed by the review of plans and strategies and the involvement of the statutory agencies for SEA, namely English Heritage, the Environment Agency, English Nature and the Countryside Agency (the relevant functions in SEA/SA terms of the latter two have since combined to form Natural England).

The SA objectives developed through this process are as follows:

<table>
<thead>
<tr>
<th>Social progress which recognises the needs of everyone</th>
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<tbody>
<tr>
<td>SP1: To increase the level of participation in democratic processes.</td>
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<td>SP2: To improve access to services, facilities, the countryside and open spaces.</td>
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<td>SP3: To provide everyone with a decent home.</td>
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<td>SP4: To improve the level of skills, education and training</td>
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<td>SP5: To improve the health and sense of well-being of people.</td>
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<td>SP6: To create vibrant, active, inclusive and open minded communities with a strong sense of local history.</td>
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<tr>
<th>Effective protection of the environment</th>
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<tr>
<td>EN1: To protect and enhance biodiversity.</td>
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<tr>
<td>EN2: To preserve, enhance and manage landscape quality and character for future generations.</td>
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<tr>
<td>EN3: To improve the quality of the built environment.</td>
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<td><strong>Sustainable use and management of natural resources</strong></td>
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<td>NR1: To improve local air quality and reduce greenhouse gas emissions.</td>
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<td>NR2: To improve water quality and water resources.</td>
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<td>NR3: To restore and protect land and soil.</td>
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<td>NR4: To manage mineral resources sustainably and minimise waste.</td>
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<td><strong>Building a sustainable economy in which all can prosper</strong></td>
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<tr>
<td>EC1: To retain existing jobs and create new employment opportunities.</td>
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<tr>
<td>EC2: To improve access to jobs.</td>
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<td>EC3: To diversify and strengthen the local economy.</td>
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4.0  Sustainability Appraisal of Options and Policies

4.1  Local Plan Objectives

It is essential that the Local Plan provides measurable objectives designed to implement the Local Plan vision. They set the context for spatial policies and proposals within the Local Development Framework.

SEA/SA guidance states that it is important that the objectives of the Local Plan are in accordance with sustainability objectives and as such, an assessment of the compatibility of the two sets of objectives was undertaken. This assessment demonstrated that the Local Plan objectives are generally well aligned to the SA objectives. It also highlighted those aspects which needed to be carefully considered in the development of Local Plan policies.

4.2  Core Strategy Issues and Options

As part of its Issues and Options consultation, ABC consulted on a number of options.

These options were assessed against the SA Framework. This assessment identified the extent to which the proposed strategic options in the emerging plan were considered to encourage sustainability.

Basic Principles

Principles for the Scale of Development
Increasing the scale of the development to above that of the regional target, while contributing towards economic growth, would potentially have a number of environmental implications (e.g. increased energy consumption, habitat loss due to land take, impacts upon the landscape). In addition, increased scale of development may have social implications in terms of capacity of infrastructure to cope with additional demand. Adoption of a programme of housing clearance is likely to be beneficial in relation to most environmental objectives (e.g. will enable redevelopment of previously developed land, will present an opportunity to improve the energy efficiency of housing in the borough). However, this may impact upon existing residents if replacement housing is not affordable to those who had to sell their property under Compulsory Purchase Order (or similar) as part of a clearance scheme.

Principles for the General Locations of Development
Distribution of new development concentrated in Key Service Centres (KSC) is likely to have beneficial effects in relation to social objectives (e.g. more opportunities for affordable housing, good access to services and facilities for new developments) and economic objectives (e.g. more opportunities to stimulate inward investment). Dispersing development based on population / building rates could result in development in rural areas with limited facilities and services, with both environmental and social implications. Distribution of housing based on local circumstances would have a number of environmental benefits (as environmental constraints will be taken into consideration) and socio-economic benefits due to increased opportunities for the regeneration of deprived areas.

Principles for Choosing and Prioritising Sites for Development
Adoption of the sequential approach across the entire borough may have social implications as most brownfield land is located in the south of the Borough, which may limit opportunities for provision of housing in the north. Adoption of the sequential approach based on Housing Market Areas or on individual settlements would reduce the risk of this happening. However, the individual settlements approach will also
encourage development of greenfield land of the edge of villages where brownfield land is not available, and thus potentially have environmental and social implications (e.g. less access to services).

**General Location of Development**
Not defining Local Service Centres (LSC) could limit access to services as it may restrict larger villages from developing as service centres. In addition it may result in significant development in rural areas which will increase reliance upon the private car and have implications for air quality and greenhouse gas emissions. Identifying LSCs (within the Core Strategy or at a later stage) will contribute to economic growth and the creation of new employment opportunities by increasing demand for services in LSCs. However, it should be noted that restricting development to LSCs may in some cases affect the viability of smaller village economies.

**Policy Approaches**

**Settlement Hierarchy**
Identification of a hierarchy of villages in the selection of LSCs and restricting the number of villages where development will be allowed will be beneficial in terms of social objectives as it will enable best use to be made of existing services and facilities and will offer greater opportunity for provision of affordable housing. In addition, identifying a hierarchy and restricting the number of villages will provide greater opportunities for provision of public transport services and recycling facilities. Should the Core Strategy follow a similar policy to the IHP, this will result in most development occurring in urban areas, and thus help to ensure that new houses have good access to services and will help to reduce the need to travel and the reliance on the private car.

**Town / Village Boundaries**
Not determining boundaries around the KSCs and the LSCs may result in development taking place outside of these centres and reduce accessibility to services and facilities. In addition under this option there would be limited opportunities to restrict the location of development and thus to protect ecologically / archaeologically sensitive sites, the rural landscape and the floodplain. However, determining boundaries could restrict the overall area of development land available. A criteria based policy to control location of development may help to ensure that development takes place within proximity of existing services and to protect environmental assets, depending upon the criteria included within the policy.

**Remote Areas**
Taking geographical criteria into account in determining LSCs may result in development in smaller villages that have limited or no local services / facilities. However, this option will increase accessibility to a limited range of essential services for rural residents, as it will even the spread of LSCs across the Borough. Using geographical criteria in the selection of LSCs may potentially result in more impacts upon the landscape and character of smaller villages.

**Distribution of Housing Land Allocation**
Concentrating housing allocations in KSCs is likely to have the most beneficial effects in relation to social objectives (e.g. more opportunities for affordable housing, good access to services and facilities for new housing) and in relation to reducing the reliance on the private car. However, dispersing housing allocations to include the largest LSCs would also enable good access to services and facilities for new housing and would enable provision of affordable housing in these centres. Concentrating rural allocations on providing housing for local needs would help to ensure that housing meets the needs of local residents; however this could have environmental implications depending upon the precise location of new developments.
Conversion of Existing Buildings
Allowing conversion of existing buildings in line with the current Local Plan policy would provide the most opportunities for empty buildings to be brought back into use and for the provision of affordable and other types of housing. This would have social, economic and environmental benefits. Allowing unrestricted conversion may result in commercial properties being converted and loss of employment space within rural areas. Sensitive design of conversions may be required to ensure that the historic value of buildings is protected.

Affordable Housing
Locating affordable housing wherever the need arises will help to ensure provision of local affordable housing for people living in rural areas. However, this may result in development in smaller villages / hamlets with limited or no local services and limited public transport provision. There may also be fewer opportunities for re-use of derelict land associated with this option. Allowing single affordable dwellings under the ‘exception sites’ rule will also help to allow the provision of affordable housing in rural areas. Imposing an affordable housing quota will ensure a high level of affordable housing is provided: if this quota is flexible (to reflect local needs) this will enable channelling of affordable housing where it is most needed. The higher the quota provided, and the smaller the sites it is imposed on, the further the Core Strategy will go towards meeting the housing needs of the borough. However, stipulating a very high affordable housing quota and / or imposing the quota on very small sites may render housing development unviable.

Gypsy / Travellers Accommodation
Identification of sites for gypsies and travellers where there is greatest need will provide the most opportunities to ensure that the needs of the travelling community are met. There may be environmental implications associated with identification of gypsy and travellers’ sites, depending upon the location(s) selected. Restricting sites to urban areas may reduce impacts upon the landscape and rural character of villages and hamlets.

Policy Options for the Environment
Continuing to define local landscape designations and identify green space within urban areas will provide the greatest protection for the natural and built environment. However, reliance on criteria based policies would also provide opportunities for protection of landscape and urban green space, depending upon the wording of such policies. Identifying as much green space as possible, while using criteria to protect any unidentified areas would provide a number of environmental and social benefits (e.g. benefits to health and well-being due to recreational value of green spaces).

Restricting all development in the floodplain will reduce the number of people and properties at risk from flood events and also protect biodiversity, landscape and archaeological resources associated with the floodplain. However, this option will limit opportunities to bring derelict land and empty buildings in the floodplain back into use. Allowing development in the floodplain would have social and environmental implications, particularly in the long term as flood events are likely to increase as a result of climate change.

Should the council be more proactive in seeking repair and enhancement of Listed Buildings this will help to improve the landscape and built environment, as well as increasing opportunities to make use of existing buildings. Compiling a local list of buildings presents an opportunity to provide protection to the urban and rural landscape by identifying buildings that contribute to the landscape and thus merit preservation.

Economic Development
Allocation of employment land will help to create new employment opportunities and assist with economic growth. Continuing the retention of a generous supply of allocated and committed employment land may
however result in an oversupply of employment land with limited opportunity to stimulate critical mass and attract inward investment. Allocation of land in line with past building rates, which are much lower than the RSS targets may not provide enough choice for new businesses wishing to set up in Allerdale. Development of employment sites may result in effects upon the environment, depending upon their location. Concentrating development in KSCs will minimise the impact of development on the rural landscape; however this option could have an effect upon the character of KSCs unless sensitively designed. In addition, concentrating development in KSCs will mean that job opportunities are more easily accessible by public transport, cycle routes and footpaths. Locating employment in both KSCs and LSCs will promote economic growth in both urban and rural locations. Allowing new businesses in the open countryside, only where there would be no adverse environmental impact, will have environmental benefits as it will enable environmental assets to be protected.

Resisting the conversion of isolated or remote buildings may have social implications as it will reduce accessibility to employment for residents of remote villages and may result in younger members of the community having to move from remote areas and will limit the potential for empty buildings to be brought back into re-use. However, it will help to protect the rural landscape and the historic value of such buildings.

Tourism
Continuing to allow new tourism proposals and extensions to existing facilities in open countryside will provide employment opportunities for the rural population and may also improve access to outdoor recreational facilities in rural locations. However, this option may have environmental implications: development may result in impacts upon landscape and the rural character of smaller villages. In addition, there are likely to be limited public transport links in the open countryside and development here may therefore increase reliance upon the private car.

Restricting tourism development to conversions and extensions may enable empty buildings to be brought back into use. Treating proposals for new build holiday cottages as tourism development may limit opportunities for provision of affordable housing and other housing to meet the needs of local residents.

Town Centres
Promoting retail development in towns other than Workington will have beneficial effects in terms of social and economic objectives as it will help to promote access to services and encourage economic growth in these areas. Allowing residential use in town centres will contribute towards the provision of housing in the borough, but may cause conflicts between retail and residential uses.

Leisure
Requiring developers to provide appropriate children’s play areas in developments of a certain size will have social benefits as they help to establish a sense of community and provide accessibility to leisure for children.

Recycling
Inclusion of recycling facilities in new development will have environmental benefits: encouraging recycling and thus reducing the amount of waste going to landfill. This will also help to minimise pollution to water and soils associated with landfill sites. Encouraging the use of locally sourced materials will help to reduce air pollution and greenhouse gas emissions associated with the transportation of building materials. Encouraging the use of recycled materials will help to reduce the demand for newly produced materials and reduce energy required in their protection. In addition it will help to reduce extraction of natural resources.
Energy Efficiency and Renewable Energy

Requiring developers to include energy efficiency measures generate a proportion of energy from renewable sources and submit energy / renewable energy statements would have a number of environmental benefits, including minimisation of greenhouse gas emissions and reduction in the use of fossil fuels, and social benefits through reducing fuel poverty and improving health. Renewable energy generation could have an effect upon the landscape, character and distinctiveness of an area.

Transport

Directing development to locations where greatest choice of transport modes is available and ensuring new developments incorporate measures to encourage more sustainable patterns of transport will have social, economic and environmental benefits. These include provision of good accessibility to jobs, services and facilities, and reducing the reliance on the private car, thus minimising air pollution and greenhouse gas emissions. Provision of more car parking in town centres will assist in improving accessibility to services for all members of the community and may make the town centre more attractive to businesses. However, it may also encourage further car use and increase traffic in the town centre.

4.3 Core Strategy Strategic Options

Following on from the work undertaken at the Issues and Options stage of the process, ABC developed a series of Strategic Options, considering growth levels and spatial approaches.

These options were assessed against the SA Framework. This assessment identified the extent to which the proposed strategic options in the emerging plan were considered to encourage sustainability.

Growth Level Options

The differences between the two options largely centred on the rates of development proposed, how these may or may not support socio-economic development and the consequent effect upon the natural environment.

In general it was considered that the strict growth option, would be unable to significantly transform the borough in terms of social progress. Conversely, the maximum growth option had more potential to support social progress, although there was some concern that such levels of growth may be unsustainable, or may put a strain or local services if implemented incorrectly.

It was determined that there was likely to be a similar situation regarding economic development, with the strict growth option offering little change in the baseline conditions, while the maximum growth option had some potential to promote a sustainable economy.

There was a risk that the promotion of greater socio-economic progress would place pressure on the natural environment, something for which the maximum growth option had more potential than the strict growth option. However, both options promoted development and had potential to result in such negative effects as increasing flood risk, the loss of wildlife habitat, the depletion of landscape quality, the development of greenfield sites, the generation of waste and the emission of air pollutants/greenhouse gases. In addition, both options had the potential to enhance/deplete the quality of the built environment.
Spatial Options

The SA assessed four main spatial options:

- Option 2: Urban Focus / Rural Concentration.
- Option 3: Urban Bias / Rural Concentration.
- Option 4: Urban Bias / Rural Concentration / Clusters.
- Option 5: Urban Bias / Rural Concentration / Cockermouth Diversion.

The results found that all the options were generally quite similar in terms of sustainability effects, particularly options 3, 4 and 5. However, some minor differences were identified. Option 2 promoted a higher concentration of development in urban areas (i.e. Workington and Maryport) and other Key Service Centres (KSCs) (Cockermouth and Wigston). This would help to encourage new housing and commercial development in accessible locations and with good access to services, facilities and infrastructure. In addition to social benefits associated with good access, the promotion of development in these areas should help to minimise the need for private car travel and encourage people to walk, cycle and make use of public transport. This may help to improve air quality and reduce greenhouse gas emissions. Options 3, 4 and 5 may result in developments which rely on travel by private car, with a subsequent impact upon air quality and greenhouse gas emissions.

However, this option does limit development elsewhere, which will mean that service provision within rural areas may not necessarily improve, and people already living within these areas will need to travel to access certain services. Options 3, 4 and 5 are likely to protect services within the smaller rural settlements and should therefore help to ensure better accessibility to services for those living within rural areas.

Option 2 may also limit accessibility to local housing for residents of Local Service Centres (LSCs) and other rural areas. In these locations a lack of available quality housing may result in rising house prices. This may lead a sense of community being lost as younger members of the community have to move away from the local area. While options 3, 4 and 5 do provide slightly more opportunities for development of housing in rural areas, they too restrict rural affordable housing to LSCs only.

All options would result in development with potential to result in impacts on environmental resources such as biodiversity, landscape water and soils. Large scale development in and surrounding Workington and Cockermouth could affect the River Derwent Special Area of Conservation (addressed within the separate Habitats Regulations Assessment). There are also various SSSIs and County Wildlife Sites which could be affected by development in LSCs and KSCs.

Option 2 maximised development in urban areas, which will provide more opportunities for and re-use of previously developed land and existing buildings, which will contribute towards the restoration and protection of land and soils. Options 3, 4 and 5 will also enable development of brownfield sites, but are more likely to also involve significant greenfield land development.

In economic terms all options provided for commercial development as well as residential development which should contribute towards the creation of jobs in the area. Option 2 will maximise commercial development in urban areas which will provide an opportunity to stimulate critical mass and attract inward investment thus transforming the urban area. However limiting development in rural areas may affect the
viability of village economies. Options 3, 4 and 5 will also support the role of the KSCs and larger LSCs. This will help to provide opportunities for strengthening and diversifying both urban and rural economies.

A series of recommendations were proposed as a result of the assessment findings, which were then taken forward to the next stage of the development of the (then) Core Strategy.

### 4.4 Core Strategy and Development Management Preferred Options

As part of its Preferred Options consultation, ABC consulted on a wide range of preferred options relating to both the Core Strategy and the Development Management policies. In addition to the preferred options, all reasonable alternatives that had been considered as part of the process to date were also assessed, in order to accurately determine, which option was the most sustainable. The alternatives considered, generally included a ‘do nothing’ option, but also considered alternative ways of implementing a particular objective, for example this might be the comparison between adopting a balanced approach to the protection of historic environment assets when new development is proposed, against adopting a strict approach, or adopting an affordable housing target that reflects the different levels of need across the Borough, against adopting a single affordable housing target for the whole Borough.

These preferred and alternative options were assessed against the SA Framework. This assessment identified the extent to which the proposed options in the emerging plan were considered to encourage sustainability, and identified where alternative options had performed well what particular elements of these policies might be able to be built into the final policies in order to further benefit sustainability.

The SA process that was undertaken on the draft Core Strategy and Development Management Preferred Options and alternative options, generally illustrated that the preferred options present the most sustainable approach to future development in the Borough. This did not necessarily mean that they all resulted in positive effects, but in considering the overall approach they in-combination present the most sustainable solution. There are many areas, where the scale of the impact identified depended on further assessment, design and implementation. Additional evidence such as the Habitats Regulations Assessment (HRA) would therefore need to be fully taken into account when confirming the final policy approach for the Borough and when considering site specific allocations.

Mitigation measures needed to be incorporated, where adverse impacts were identified, or built into those policies where potential issues relating to design and implementation had identified potential risks.

### 4.5 Local Plan Policies

The Local plan policies seek to implement the Local Plan vision and objectives. The pre-submission version of the Local plan has been subject to SA to predict and evaluate the nature (positive, negative or neutral) and scale (significant or non-significant) of the social, environmental and economic effects.

The assessment indicated that the Local Plan performs with mixed results against the SA Framework, but on the whole achieves a balance of significant positive effects. The assessment highlighted significant beneficial effects against all of the SA objectives in the framework for most of the policies with the exception of policies which directly promote new development, in particular with regards to environmental objectives.
The Local Plan policies meet the range of sustainability objectives identified in the SA Framework to a large extent. The Local Plan policies are considered to offer potentially significant positive effects on environmental, social and economic objectives.

Where adverse impacts were identified in the previous assessment, amendments to the policies have been built into those policies where potential issues relating to design and implementation have previously identified potential risks.

Amendments made to the policies as a result of the previous SA and the consultation on the Core Strategy have been reassessed in order to ensure that amendments do not have an adverse sustainability impact that had not previously been identified.

As a result of changes made to the policies due to previous appraisals; there have been no significant adverse effects identified during the process of this SA. This policy document, on balance, is considered to be beneficial to the sustainability of the Allerdale Borough.

The extent of the significance of both positive and negative effects and subsequent mitigation will be assessed in greater detail in the appraisal of subsequent specific DPDs and SPDs (where SA is required). Consequently careful wording of more specific policies could minimise or enhance these potential significant effects identified in the assessment of Local Plan policies as well as ensuring that there is appropriate provision for the protection of the environment.

Recommendations have been made where possible in terms of broadening aspects covered by particular policies or strengthening their requirements, in order to mitigate potential negative effects and enhance positive ones.
5.0 Conclusions and Next Steps

5.1 Conclusions

The Local Plan policies within the Allerdale Local Plan Pre-Submission version (2013) meet the range of sustainability objectives identified in the SA Framework to a large extent. The Local Plan policies are considered to offer potentially significant positive effects on many of the environmental, social and economic objectives.

The extent of the significance of both positive and negative effects will be addressed in greater detail in the appraisal of subsequent specific DPDs and SPDs (where SA is required). Consequently, careful wording of more specific policies could minimise or enhance these potential significant effects identified in the assessment of the Local Plan policies as well as ensuring that there is adequate provision for the protection of the environment.

Throughout the process of the development of the Local Plan and the SA work that has been undertaken a number of recommendations have been made to ABC in terms of sustainability, and additions and changes have been made as a result of this. At all stages of the SA and Local Plan process, ABC have taken into account the recommendations made in the earlier stage of the process. Not all recommendations have been taken on board, but this is due to the need to balance the differing demands of the HRA, SA, SEA and other decision-making tools. ABC has maintained a record of the changes that have been made to the policies as a result of their evolution, and the Local Plan provides the justification for the policy which includes reference to SA decision-making.

These additions and changes have resulted in further enhancement of the sustainability performance of the Local Plan.

5.2 Monitoring

Monitoring the significant sustainability effects of implementing the Core Strategy will be an important ongoing element of the SA process. SA monitoring covers significant social, economic and environmental effects and it involves measuring indicators which will enable a better understanding of the causal links between the implementation of the plan and the likely significant sustainability effects (both beneficial or adverse) being monitored. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.

The monitoring for the Local Plan will be undertaken by ABC as part of the Annual Monitoring Report that the Council is required to produce in line with the Local Development Framework.
5.3