

South Lakeland Local Plan Part 3

Sustainability Appraisal of Development Management DPD: Publication Version

**SA Report
Non-Technical Summary**

August 2017



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Introduction

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1 INTRODUCTION

- 1.1.1 AECOM was commissioned to undertake Sustainability Appraisal (SA) in support of the emerging South Lakeland District Council Development Management Policies Development Plan Document (DPD), which, when adopted will form part of the Local Plan. SA is a mechanism for considering and communicating the likely significant effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.
 - 1.1.2 This document is a Non-Technical Summary of the main SA Report which appraises the implications of the South Lakeland Development Management Policies DPD (Pre-submission version), as well as documenting the SA process and outputs from previous stages of the plan-making process.
 - 1.1.3 SA is a process for helping to ensure that Local Plans achieve an appropriate balance between environmental, economic and social objectives. SA should help to identify the sustainability implications of different plan approaches and recommend ways to reduce any negative effects and to increase the positive outcomes.
 - 1.1.4 The DPD, once adopted, will provide a framework of policies to help the council assess whether or not the application should be granted planning permission. The plan will also guide how and when development will be delivered, whilst protecting and enhancing the environment.
- 1.1 Outline of the Plan**
- 1.1.5 The DPD will apply policies depending on the type and location of proposal being considered. This includes a range of topic areas including sustainable travel, environmental protection, town centres, housing, design, open space, historic environment, tourism development, broadband and enforcement.

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Scoping

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2 SCOPING

2.1 Background

2.1.1 The scoping stage of sustainability appraisal involves the collation of evidence relating to the baseline position and policy context - culminating in a series of key issues that should be a focus for the SA and which helped to establish a sustainability framework. These key issues are summarised below.

2.2 Key issues

Housing

- High levels of second home ownership
- Housing affordability
- Lack of appropriate mix and amount of housing types, sizes and tenures

Economy, Town Centres and Tourism

- Relative affluence can disguise smaller areas of relative deprivation.
- Young people leaving the area to undertake higher education and often don't return due to a lack of suitable jobs and housing affordability.
- A significant minority of the population have no qualifications.
- Tackling vacancy rates in town centres and ensuring viability and vitality of town centres.
- Loss of better-paid professional/commercial employment. More people forced to commute out of District for well-paid work.
- Key town centre locations in need of regeneration.
- Mismatch between local skills/qualifications and those required for new jobs available.
- Low unemployment masks a heavy reliance on often low paid service sector work and lack of variety in job sectors.
- Imbalance between the importance of tourism and culture and the relatively low value outputs and low waged jobs they create.

Quality Environment and Quality Design

- The character and distinctiveness of the historic and built environment, cultural heritage and character is vulnerable to unsympathetic alterations and development and requires protection and enhancement
- Balancing needs for housing and employment, tourism and leisure with the need to protect highly valued landscapes, biodiversity and geodiversity, including both protected and non-designated sites and species
- Pockets of poor air quality
- Ensuring that low crime levels remain the norm in the District
- Identified risk of flooding to significant areas, including parts of main towns.
- Enabling the best use of limited brownfield development opportunities;
- Need to reduce high level of domestic waste collected
- Increasing demand for water resulting in over abstraction from catchments and for wastewater treatment as well as continuing threats of pollution to water resources.

Sustainable Communities and Health and Wellbeing

- Pressure on health services coupled with a lack of Category A Emergency Medical Provision.
- Enhancing opportunities for sport and recreation provision and facilitating healthier lifestyles
- High and increasing proportion of the population is over 60 –implications for services.
- The severity and type of the long-term impacts of climate change are still uncertain. Measures are required to enable the District to adapt to and mitigate against likely impacts.
- Increasing the proportion of energy use derived from renewable sources and reducing reliance on fossil fuels
- Reducing waste and increasing opportunities to recycle and compost waste

Sustainable Travel and Access

- Enable people to choose other modes of transport than private vehicles, including safer, active, sustainable travel
- Supporting the retaining of community facilities and encouraging new facilities and infrastructure
- Poor road and rail infrastructure, particularly regarding access to the west of the District.
- Traffic congestion and junctions operating at near or above capacity levels in Kendal.
- Ensuring equalities and fairness in terms of access to services and facilities for all.

2.3 The SA Objectives

- 2.3.1 A series of Sustainability objectives were established through the scoping process, which have been used as the framework for appraising the effects of the Plan (and any alternatives).

SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

- SP1 - To increase the level of participation in democratic processes
- SP2 - To improve access to services and facilities, the countryside and open spaces
- SP3 - To provide everyone with a decent home
- SP4 - To improve the level of skills, education and training
- SP5 - To improve people's health and sense of wellbeing
- SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

EFFECTIVE PROTECTION OF THE ENVIRONMENT

- EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity
- EN2 - To conserve and enhance landscape quality and character for future generations
- EN3 - To improve the quality of the built environment
- EN4 - To protect, enhance and maintain green infrastructure

SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 - To improve access to jobs

EC3 - To diversify and strengthen the local economy

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Alternatives

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3 ALTERNATIVES

3.1.1 Stage 2 of the SA/SEA process involves identification and assessment of ‘reasonable alternatives’. This means comparing different approaches that could be taken to achieve the objectives of the DPD, which in this case relates to whether there are different options for policies that will be included within DPD. The following table presents a summary against each policy of the alternatives considered and approach taken.

Preferred plan policy	Options considered and discarded	Summary of rationale for preferred approach
DM1 General requirements	Option 1: Maintain current position. Option 2: Rely on national policy	Consistent approach to development and enables NPPF core principles.
DM2 High quality design	Option 1. Maintain current position. Option 2. Rely on national policy and Core Strategy	Enables a policy to be adopted that incorporates current/new guidance.
DM3: Historic Environment	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy	Enables a policy to be adopted that incorporates current/new guidance.
DM4: Green infrastructure and open space	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy	Fills existing gaps in policy, including a lack of clarity on the requirements for new open space in terms of quantity and financial contributions. It also allows for a more comprehensive approach to Green Infrastructure to be taken.
DM5: Rights of way	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy	Would enable the Council to further elaborate on expectations regarding provision of pedestrian and cycle access in new developments. It will help to embed Council objectives around promotion of active travel.
DM6: Water management	Option 1: Continue to rely upon national policy and Core Strategy.	The policy is considered necessary in order to emphasise current and new guidance and practices with regard to management of surface water disposal and foul water disposal and treatment.
DM7: Addressing pollution and contamination impact	Option 1: Continue to rely upon national policy and guidance.	Enables the Council to set out specific requirements relating to all forms of pollution to be covered in a policy in a collective manner. It would result in the plugging of a policy gap in this area.

Preferred plan policy	Options considered and discarded	Summary of rationale for preferred approach
DM8: High speed broadband for new developments	<p>Option 1: Maintain current position.</p> <p>Option 2: Rely on national policy and Core Strategy</p>	Offers the opportunity for the Council to promote the provision of high speed broadband in new developments and improve coverage.
DM9: Parking Provision, new and loss of car parks	<p>Option 1: Maintain current position.</p> <p>Option 2: Rely on national policy and Core Strategy</p>	Would enable current policies relating to car parking to be condensed into one policy. It would enable the Council to set out a range of factors that would be taken into consideration in a consistent way when assessing any proposal requiring parking provision.
DM10: Safeguarding land for transport infrastructure improvements	<p>Option 1: Maintain current position.</p> <p>Option 2: Rely on national policy and Core Strategy</p>	Enables the Council to set out its support for retention and enhancement of disused railway lines and the canal, whilst also emphasising how development should be encouraged which maximises their wider benefits.
DM11: Accessible and adaptable homes	Option 1: Do not introduce the new optional building regulations in relation to accessibility and adaptability.	Enables the Council to make sure new homes are more accessible and adaptable to help meet people's changing needs better, particularly its ageing population.
DM12: Self-build and custom build housing	<p>Option 1: Maintain the current policy position.</p> <p>Option 2. Require a percentage of plots on larger sites to be made available for self-build or custom build housing.</p>	Raises the profile of self-build in the Council's planning policy framework and set out clear guidance for prospective self-builders.
DM13: Housing development in small villages and hamlets	Option 1. Maintain the current policy position	A new policy provides opportunity to set out a more consistent approach to small scale new development on the edge of small villages and hamlets, to replace 'infilling and rounding off'.
DM14: Rural housing exception sites	Option 1. Maintain the current policy position	This may encourage more (appropriate) rural exceptions sites to come forward which will help meet affordable need, by allowing for a small proportion of market housing where essential for viability. A revised policy also provides opportunity to encourage self-build and custom build housing.

Preferred plan policy	Options considered and discarded	Summary of rationale for preferred approach
DM15: Essential dwellings for workers in the countryside	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy	Will give full opportunity to update and improve existing policy and in particular to take the opportunity to introduce the restriction that only temporary dwellings will be permitted for businesses in operation for less than three years.
DM16: Conversion of Buildings in Rural Areas	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy	Gives full opportunity to improve existing policy by adopting a new policy with updated and amended criteria.
DM17: Retention of Community Facilities	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy	Will ensure a consistent approach and enable updates regarding the type of criteria that should be applied when considering any proposal involving the loss of a community facility.
DM18: Tourism accommodation outside the AONB	Option 1: Maintain current position. Option 2. Rely on national policy and Core Strategy	Gives the Council the opportunity to update and streamline the existing dated saved Local Plan policies in line with the NPPF.
DM19: Equestrian related development	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy	This option would allow the Council to review and update the existing dated saved Local Plan Policy L9 in line with the NPPF.
DM20: Advertisements, signs and shopfronts	Option 1: Maintain current position. Option 2; Rely on national policy and guidance	This option would take the opportunity to review and update the existing policies into a single policy.
DM21: Renewable and low carbon energy development	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy and Cumbria Wind Energy SPD	Allows for the updating of existing policies and the creation of a single clear policy that can apply to all renewable technologies, offering a more future proofed approach should new technologies emerge.
DM22: Hot food takeaways	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy	Enables the Council to specify more clearly the range of factors that will be taken into account when assessing a planning application for a hot food takeaway.

Preferred plan policy	Options considered and discarded	Summary of rationale for preferred approach
DM23: Retail uses outside of Town Centres	Option 1: No Policy – rely on National, Core Strategy and Land Allocations Policies. This would result in saved Local Plan policies R2 and R5 becoming redundant.	This option would enable the Council to adopt a policy that reflects local circumstances; ensuring decisions are made in terms of the local rather than a national context.
DM24: Kendal town centre and Kendal canal head area	Option 1: Maintain current position. Option 2: Rely on national policy and Core Strategy and land allocations.	This option would plug a current policy gap and ensure the Council has a policy framework in place to consider proposals within the Canal Head area. Provide a policy for Kendal Town Centre that goes wider than current policy.
DM25: Agricultural Buildings	Option 1: Maintain current position. Option 2: No policy, rely on National and Core Strategy policies	The policy is considered to provide stronger guidance than the existing policy on the location of agricultural buildings alongside the evidence required relating to need.
DM26: Gypsies, Travellers and Travelling Show People	Option 1: Take account of the resulting evidence in a separate Local Plan document or the forthcoming single Local Plan review from 2017. This could include revisions to Core Strategy, if judged necessary.	An updated policy provides opportunity to replace the current Core Strategy policy and take account of national policy in the NPPF. This provides additional clarity in the policy framework to guide decisions with criteria as to what will constitute a suitable location for Gypsy, Travellers and / or Travelling Show people. This approach allows decisions to be taken on such proposals based on the evidence of need at the time, therefore avoiding the negative impacts of delaying setting out a position whilst awaiting the preparation of more up to date evidence
DM27: Enforcement	Option 1: Rely on national policy and Core Strategy and land allocations.	This option would plug a current policy gap enabling the Council to set out its position on how it will respond to breaches of planning control through application of policy and protocol.

3.1.2 For some policy areas / issues, the resulting approach did not lead to a new policy in the Development Management Policies DPD. These are summarised below.

Policy approach	Alternatives considered and discarded	Summary of rationale for preferred approach
Not to introduce the optional water standards	Option 1: Introduce the optional requirement within G2 of the Building Regulations to reduce water usage in new dwellings from 125 litres/ person/ day to 110 litres/ person/ day.	It is not considered that the Council can demonstrate a 'clear need' to introduce higher optional standards as required and defined in the online Planning Practice Guidance.
Not to introduce the optional space standards	Option 1: Introduce the nationally described space standards.	Whilst this option would have positive impacts on the quality and practicality of new homes provided, it would limit the range of property sizes available and negatively impact upon the affordability of new build homes.
Rely on national policy on Starter Homes exception sites and existing Core Strategy policy	Option 1: Introduce a local Starter Homes exceptions site policy, setting out how new national policy will be implemented in South Lakeland.	It is not considered appropriate to preempt the provision of the forthcoming national Regulations on Starter Homes. It is not clear at this stage how much scope local authorities will have in applying the Starter Homes Regulations.
No longer apply a policy for telecommunications equipment proposals (rely on national policy)	Option 1: Maintain current policy position. Option 2: Adopt a new/updated policy.	Changes to permitted development rights over recent years have taken many more types and scales of telecommunications developments outside of local planning authority control and it is not therefore considered necessary to have specific policies for this type of development.
Self-catering accommodation covered in two new policies. (new Policy DM16) (new Policy DM18)	Option 1: Maintain current policy position. Option 2: Rely on National Policy, Core Strategy and Land Allocations Policy.	This option would allow some elements of Local Plan Policy T4 to be reviewed / amended and carried forward to new policies relating to the conversion of buildings in rural areas and tourist accommodation. It would allow policy to accord with the NPPF.
Have no new policy for Retail and other uses in Town Centres and instead rely on National, Core Strategy and Land Allocations policies.	Option 1: Adopt a new policy in line with current NPPF & PD Rights.	It is not considered necessary to introduce specific controls on the location, number of different uses within town centres, the Core Strategy and Land Allocations policies should be applied in this respect.

Policy approach	Alternatives considered and discarded	Summary of rationale for preferred approach
Have no new policy in relation to coasts and instead rely on National and Core Strategy policies.	<p>Option 1: Maintain current policy position.</p> <p>Option 2: Adopt a new/updated policy.</p>	It is considered Core Strategy policy CS8.5 continues to provide a relevant basis on which to determine proposals affecting the coast.
No longer apply Local Plan Policy E6 regarding the loss of employment sites and instead rely on National, Core Strategy and Land Allocations policy.	Option 1: Maintain current policy position.	It is considered that a new policy is not needed. The national policy guidance in NPPF, paragraph 22, is considered sufficient and there is a need to ensure a flexible and positive policy approach.



Appraisal of the plan

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4 APPRAISAL FINDINGS

4.1 Cumulative assessment findings

4.1.1 The following section sets out a summary of the effects of the Development Management DPD when considered 'as a whole' against a range of sustainability factors (The SA Framework).

Social Progress that meets the needs of everyone

4.1.2 Almost all the policies in the Publication DPD are predicted to have positive effects upon social progress, though some policies are not predicted to be significant when considered in isolation. Overall, the DPD is predicted to have **significant positive effects** on social progress, mainly relating to housing (SP3), health (SP5), improved recreation and environments (SP2). No significant negative effects are identified.

Effective protection of the environment

4.1.3 The Publication DPD policies are mostly positive with regards to environmental protection and enhancement. There are two broad positive themes that come through strongly in the appraisal; protection of the character of the built and natural environment, and the enhancement of green infrastructure. On balance, the Publication DPD is predicted to have a **significant positive effect** upon the environment, including the protection and enhancement of green infrastructure (EN4), biodiversity conservation (EN1) and the protection and enhancement of the built environment (EN2, EN3). There are no significant negative effects predicted.

Sustainable use and management of natural resources

4.1.4 Viewed individually, the DPD policies are predicted to have mostly insignificant effects upon the use and management of natural resources. On balance the Publication DPD is predicted to have a **significant positive effect** upon natural resources, though the effects would likely only accrue in the longer term. The positive effects are likely to be 'spread thinly' across the district, rather than being notable in any particular location or against any particular receptors (i.e. air, water or soil).

Building a sustainable economy in which all can prosper

4.1.5 The Publication DPD is predicted to have a mix of effects regarding the economy, with some policies having a neutral effect, none overall having negative implications, but the majority having benefits, ranging from insignificant to major significant. Overall, the Publication DPD is predicted to have a **significant positive effect** upon the economy by helping to retain workers, encourage rural diversification, and support the vitality of town centres.

4.2 Mitigation and Enhancement

4.2.1 Where significant negative effects are identified, measures to mitigate these have been suggested if possible. Further measures to enhance the positive effects of the Local Plan have also been suggested where possible. The measures listed below were identified at either draft Plan stage, Publication Stage or both. The Council responded to recommendations, and this is summarised in the table below.

Policy	SA Topic	Recommendations	Council response
DM1: General requirements	Sustainable use and management of natural resources	The policy sets out general requirements for all development, but does not make reference to climate change mitigation and adaption, the need to preserve minerals and to minimise waste or the need to protect soil resources and agricultural land. . Although some of these issues are addressed through other policy measures (DM2 Achieving Sustainable High Quality Design, CS8.9 regarding waste, and the NPPF regarding agricultural land) they are not given recognition within this overarching policy. It could also be strengthened by referring to designing developments with a transport hierarchy (pedestrians, cyclists, public transport, and cars, although this is addressed in policy DM2).	The Council consider that these elements are covered in design policy, NPPF, and Core Strategy policy e.g. CS8.9.
DM3: Historic Environment	Building a sustainable economy in which all can prosper Effective protection of the environment	A less restrictive approach to the use of funds generated by changes to improve public enjoyment could be less likely to discourage potential investment in assets that are in need of care.	The Council considered recommendations made at draft policy stage. The final policies are more positive and address previous recommendations.
DM4: Green and Blue Infrastructure, Open Space, Trees and Landscaping	Building a sustainable economy in which all can prosper	The principle of achieving net infrastructure gains is positive, but it would perhaps be beneficial to allow greater flexibility to allow more constrained sites to deliver GI without affecting viability (i.e. a lower commuted sum or mitigation for loss rather than achieving net gains).	The Council consider that it is reasonable to expect all sites to offer some gain.

Policy	SA Topic	Recommendations	Council response
DM4: Green and Blue Infrastructure, Open Space, Trees and Landscaping	Effective protection of the environment	The policy should clarify what constitutes 'net gains'; and that this could include a higher quality of GI / open space compared to the existing site	Text added to policy which makes explicit that net gains could be quantitative or qualitative.
	Sustainable use and management of natural resources	It is not clear whether 'replacement trees' would need to be provided on site or not. The additional criteria that requires a 'wider diversity' of trees needs to be clarified.	Text added to policy with reference to new tree planting being on-site with qualification of exceptions. Clarification of diversity included.
DM5: Rights of Way and other routes providing pedestrian and cycle access	Effective protection of the environment	The policy could be made more explicit as to how development ought to link with other policy areas (Green Infrastructure/open space, design, SUDs etc.) to recognise the multiple functions and forms that recreational routes can provide (and should be encouraged).	The policy was amended to include reference to the role of green corridors forming part of wider green infrastructure networks.
	Social progress that recognises the needs of everyone:	The policy could be amended to refer to the need to ensure that routes provide equitable access to all potential users where possible.	The Design policy includes requirement for inclusive designs and layouts – principle of access for all would be considered.
DM6: Flood Risk Management and SUDs	Effective protection of the environment	The policy could seek to ensure that there is no net increase in surface water run-off.	Changes made to draft policy DM6 to reflect recommendations. Leading to a more positive effect.
DM7: Addressing pollution, contamination impact, and water quality.	Effective protection of the environment	It would be beneficial to encourage the use of green infrastructure as part of pollution control solutions. However, it is acknowledged that DM4 and other policies relating to the wider environment could enable consideration of these factors.	Other policies – design and green infrastructure address this.

Policy	SA Topic	Recommendations	Council response
	Sustainable use and management of natural resources	It may be beneficial to prepare guidance on how developments will need to demonstrate neutral air quality impacts, as well as setting out the process should developments not be able to achieve this target.	Noted. There is Council guidance but it is not SPD. The guidance sets out information expected of developers in order for the Council to assess impacts on air quality.
	Building a sustainable economy in which all can prosper	There remains a need to clarify requirements for air quality neutral developments.	Local published guidance and other guidelines will be used.
DM8: High speed broadband for new developments	Building a sustainable economy in which all can prosper	The policy could be strengthened by making reference to support by community-led broadband infrastructure in areas that may not benefit from the roll out of superfast broadband.	The supporting text includes a stronger reference to community led broadband schemes, recognising their importance particularly in areas that won't be served by the fibre rollout.
DM9: Parking provision	Sustainable use and management of natural resources	The policy could be cross referenced with policy DM6 encouraging the provision of permeable parking spaces; or other forms of SUDs to ensure that surface water run-off is not increased with new parking spaces.	Additional text added at end of last para of policy to say including incorporation of measures such as permeable surfaces and sustainable drainage systems.
DM11: Accessible and Adaptable Homes	Social progress that recognises the needs of everyone	The policy could be strengthened to ensure that developments are designed to support accessibility for less able groups beyond their individual properties (i.e. between neighbourhoods).	This is a very specific policy relating to the optional building regulations, and wider issues of accessibility and inclusive design within the wider environment are covered within Policy DM2. And would be applied in conjunction with this policy.
	Effective Protection of the Environment	The policy could also make reference to the surrounding gardens, open space and green infrastructure, whereby accessibility is also considered in the design of shared space. Adaptations to homes should also be sympathetically designed to ensure that settlement character is maintained.	

Policy	SA Topic	Recommendations	Council response
DM13: Housing Development in Small Villages and Hamlets	Social progress that recognises the needs of everyone	In order to safeguard the small scale social nature of villages and hamlets, the policy wording could be strengthened to ensure that potential cumulative effects upon the character of the settlement do not occur in the long term.	Text added to criterion 1 to refer to “taking account of the cumulative impact of incremental development” (on the scale, form and character of the settlement).
	Effective protection of the environment	Over time, an incremental increase in development may lead to a change to character that is not identified at an individual application level. Perhaps the policy could include a clause that states that development must be judged against the ‘historic character’ of the settlement (as identified in a settlement character appraisal for example) rather than applying the policy against the context of settlements as they extend in size.	Criterion 1 refers to taking account of settlement scale, form and character. In addition, policies DM1 and DM2 on General Requirements and Design include criteria referring to the need to take account of historic character.
DM14: Rural Exception Sites	Social progress that recognises the needs of everyone	To encourage local residents to engage in democratic processes, the policy could be amended to so that ‘clear local support for a scheme’ should take account of community views.	Local residents will be consulted directly when a planning application is submitted and parish Councils also reflect wider community opinion.
DM16: Conversion of Buildings in Rural Areas	Effective protection of the environment	It was recommended that the draft Policy should broaden the definition of buildings that are considered suitable for conversion. To capture buildings that may be in disrepair but not necessarily of high architectural value.	The reference to traditional buildings remains an important principle to prevent the conversion of many types of buildings and structures that may not be appropriate.
DM18: Tourism accommodation – caravans, chalets, log cabins, and tented camping (outside the AONB)	Social progress that recognises the needs of everyone	In order to ensure access to services, a condition could be introduced into the policy to require developments of a certain size to provide certain services for those using the accommodation (for example, play space).	Core Strategy Policy CS1.1 ‘Sustainable Development’ sets out principles to guide development to sustainable locations, including Rural Exception sites. Policy (DM18) has been amended to clarify that sites should be sustainably located.

Policy	SA Topic	Recommendations	Council response
	Sustainable use and management of natural resources	In order to have a more positive influence on the volume of greenhouse gas emissions associated with tourist accommodation sites, the policy could encourage the development of new sites that are well served by amenities, and are within walking distance of visitor attractions, recreation and public transport. Extensions to sites could also require enhancements to onsite amenities to reduce the need to travel. Consideration should also be given to ensuring the policy includes criteria for the management of waste generated on site.	<p>The amended Policy text (DM18) already supports sustainably located sites. The larger existing sites, e.g. Lakeland Leisure at Flookburgh, and other sites, already provide on-site facilities; recreation, play area etc..</p> <p>It is considered that adding further criteria to Policy DM18 for the management of waste generated on the site would duplicate Core Strategy Policy CS8.9.</p>
DM21: Renewable and Low Carbon Energy Development	Social progress that recognises the needs of everyone	A clause could be added to require that development proposals involve local communities and have local support for energy schemes	It is considered that an additional clause relating to community support would repeat the provisions of the Ministerial Statement.
	Sustainable use and management of natural resources	Areas of opportunity could be identified to guide developers to broad locations that are more likely to be suitable for development (and thus a favourable planning proposal).	The Council has not specifically identified suitable areas for wind energy in the DPD, but will consider this again as part of the single Local Plan review. Additional text has however been added to the supporting text of Policy DM21 to draw attention to the Cumbria Wind energy SPD, Landscape Character Guidance and Toolkit, and Cumulative Impact of Vertical Infrastructure (CIVI) study which all provide guidance as to which broad areas of the County are likely to be suitable for wind energy development in landscape terms.

Policy	SA Topic	Recommendations	Council response
DM22: Hot food takeaways	Effective protection of the environment	The policy could also set requirements for secure waste/ recycling storage facilities in proximity to hot food takeaway units in order to help reduce the potential for littering and the effect of unmanaged bins on the street scene. The policy does refer to waste in criteria 1, although this could be expanded into separate criteria within the policy.	It is considered Core Strategy policy CS8.9 covers recycling facilities requirements.
	Sustainable use and management of natural resources	Whilst it is positive to restrict hot food takeaways to no more than two uses adjoining each other, this may still not prevent concentrations of takeaways. This could be mitigated somewhat by reference to policy Criteria 2 (which seeks to protect the character of the environment). However, to avoid such scenarios occurring, it may be beneficial to limit the proportion of hot food takeaways that are present in primary shopping areas. Alternatively, the policy could include an additional criteria that would not permit such development if this reduced the number of units between A5 Hot Food Takeaways clusters to less than 2 non A5 uses, which is proposed in the draft Manchester City Council Hot Food takeaway SPD.	Other policies including Core Strategy policy CS7.5 and Land Allocations policy LA1.2 will help to manage the concentration of takeaways. The primary shopping areas will also predominantly support 'shopping uses', and so implicitly manages any concentration of hot food takeaways also. Core Strategy and Land Allocations Policy seek to ensure the predominant use in the primary shopping areas is retail. However, an additional reference added to policy to say ensure there remains a proportionate mixture of shopping uses within the immediate locality.
DM23: Retail Uses outside of town centres	Effective Protection of the Environment	The policy could potentially allow for a more flexible application of thresholds where proposals involve the redevelopment of brownfield / vacant land and buildings in out of town locations that are not suitable for other uses.	Thresholds are based on evidence contained within the South Lakeland Retail Study (2012). This does not recommend a flexible approach on brownfield sites.

Policy	SA Topic	Recommendations	Council response
DM24: Kendal Town Centre and Kendal Canal Head Area	Building a sustainable economy in which all can prosper	Whilst the policy makes reference to retail offerings in the town centre, it does not include these with regards to Kendal Canal Head. Allowing appropriate retail units within this location could have positive effects in terms of diversification of the current offer. However, it is acknowledged that it could also generate unwanted competition with the town centre and invite further traffic. The NPPF also sets out a town centre first approach, but given that the Canal Head Area is being established as a mixed-use development, some small-scale retail could possibly be beneficial (for example tourist and crafts shops).	The NPPF states that town centres should be the preferred location for retail. The Canal Head is edge of town centre, and therefore not appropriate to encourage retail in this context.
DM26: Gypsies, Travellers and Travelling Show People	Effective protection of the environment	The policy could be strengthened by making specific reference to the natural environment and including criteria on the impact on heritage assets.	It is not considered necessary to include this criteria. Policy DM1, DM2, DM4 and DM6 along with application of Core Strategy cover this criteria and will be applied accordingly.
DM26: Gypsies, Travellers and Travelling Show People	Sustainable Use and Management of Natural Resources	The policy could be strengthened by adding flood risk to the locational criteria. In addition, criteria concerned with appropriate waste storage facilities would have a positive impact.	Additional criteria added to policy to say 'waste and water disposal facilities' and footnote to explain including foul and surface water. It is not considered necessary to include reference to flood risk, which is covered by policies DM1, DM6 and the NPPF.

4.3 Monitoring

4.3.1 Monitoring measures will help to identify whether the effects identified in the SA are actually occurring, and also help to identify any unforeseen effects. Trend data is also helpful in monitoring progress towards sustainability objectives.

SA Objective	Indicators
SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE	
SP1 - To increase the level of participation in democratic processes	None identified
SP2 - To improve access to services and facilities, the countryside and open spaces	<ul style="list-style-type: none"> • % of population aged 16 to 74 who travel to work by: • Foot or cycle • Car, Van, m/cycle or taxi (incl. as a passenger) • Public Transport • Work at Home • Other / not in employment • No. of workplace travel plans as a % of new employment completions with 50+ employees • % of households within 30 minutes of key services by public transport • % of Rural households within set distances (either 4km or 2km) of key services
SP3 – To provide everyone with a decent home	<ul style="list-style-type: none"> • Housing Trajectory • Number of housing completions per annum by type and size. • Gross Affordable Housing Completions per annum; • Number of Rural Exception Sites approved and the Proportion of dwellings which are affordable and market. • Evidence of a deliverable 5 year housing land supply • House Price: Income Ratio (based on average household annual gross income. • Number of homes permitted with M4(2) requirement imposed by planning condition; • Number of homes built to category M4(2) Building Regulation
SP4 – To improve the level of skills, education and training	<ul style="list-style-type: none"> • % of pupils attaining GCSE Grades A-C
SP5 – To improve people’s health and sense of wellbeing	<ul style="list-style-type: none"> • Male and Female Life expectancy • % of people whose day to day activities are limited by a long term health problem or disability
SP6 – To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	<ul style="list-style-type: none"> • Annual crime rate per 1000 population

EFFECTIVE PROTECTION OF THE ENVIRONMENT	
EN1 – To protect, enhance and maintain habitats, biodiversity and geodiversity	<ul style="list-style-type: none"> • Area designated as SSSI (ha) • % of SSSI in recovering or favourable condition • Number of Tree Preservation Orders made.
EN2 – To conserve and enhance landscape quality and character for future generations	<ul style="list-style-type: none"> • AONB Monitoring?
EN3 – To improve the quality of the built environment	<ul style="list-style-type: none"> • % of Listed Buildings at Risk • Number of Conservation Areas reviewed in last 10 years • Number of Conservation Area Management Plans produced
EN4 – To protect, enhance and maintain green infrastructure	<ul style="list-style-type: none"> • Net gains in Green Infrastructure (ha) through new development. • Net additional trees planted through new development
SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES	
NR1 – To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel	<ul style="list-style-type: none"> • Number of application contributing to targets within Kendal Air Quality Management Area Action Plan. • Total district CO2 emissions • % of air quality monitoring sites recording above 40ug/m3 • Number of AQMA designations • Levels of renewable and low carbon energy generated by type
NR2 – To improve and manage water quality and water resources and services	<ul style="list-style-type: none"> • River Quality % at good ecological status or potential • Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds • Examples of how water disposal requirements have been incorporated within green infrastructure framework for proposals
NR3 - To restore and protect land and soil	<ul style="list-style-type: none"> • % of development on brownfield land; • Average densities achieved on all housing developments
NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling	<ul style="list-style-type: none"> • Kg of household waste collected per head; • % of Household waste recycled or Composted; • Renewable Energy given planning permission

BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER	
EC1 - To retain existing jobs and create new employment opportunities	<ul style="list-style-type: none"> • Employment Land available by type; • % of new businesses surviving at least one year • Business de registration rate.
EC2 – To improve access to jobs	<ul style="list-style-type: none"> • % of working age population who are economically active; • Unemployment levels as a % of working age population;
EC3 – To diversify and strengthen the local economy	<ul style="list-style-type: none"> • Gross Value Added (per head) • Total amount of completed floor space (gross and net) for Town Centre Uses

