

Land Allocations Sustainability Appraisal Process Note

1. Sustainability Appraisal of development plan documents is a requirement of the European Strategic Environmental Assessment (SEA) Directive 2001/42/EC which requires that the environmental effects of particular plans and programmes, including development plan documents, are fully assessed and taken into account. This Directive has been adopted into UK law as Environmental Assessment of Plans and Programmes Regulations 2004.
2. At the time that SLDC began the Sustainability Appraisal process, guidance issued by the Office of the Deputy Prime Minister (Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, November 2005) and the Department of Communities and Local Government (Sustainability appraisal guidance for DPDs in the CLG Plan Making Manual launched in September 2009) was current and it was this guidance which was used to steer the process of SA undertaken for the Land Allocations DPD.
3. This guidance specified that the five stages listed below should be undertaken to ensure compliance with the SEA Directive.
 - **STAGE A:** SET THE CONTEXT AND OBJECTIVES, ESTABLISH THE BASELINE AND DECIDE ON THE SCOPE (PRODUCE SCOPING REPORT)
 - **STAGE B:** DEVELOPING AND REFINING OPTIONS AND ASSESSING EFFECTS
 - **STAGE C:** PREPARING THE SUSTAINABILITY APPRAISAL REPORT (TO DOCUMENT THE APPRAISAL PROCESS)
 - **STAGE D:** CONSULTING ON THE DPD AND SA REPORT
 - **STAGE E:** MONITORING IMPLEMENTATION OF THE DPD
4. The [final SA report](#) (SLA10b) (paragraphs 1.5-1.11) sets out how each of these stages and the requirements of the SEA Directive have been met by SLDC in the process of undertaking the SA of the Land Allocations proposals. The full process undertaken is set out in a diagram at Appendix 1 to this document (page 13).
5. An initial draft of the SA Scoping report was produced in October 2008. The statutory bodies were consulted on the draft and [their comments](#) were incorporated into the document. The [amended document](#) (DP02) was issued for public consultation alongside the Land Allocations Discussion Paper in December 2008. Few comments were received, but where possible, comments received resulted in amendments to the document.
6. The statutory bodies provided limited comments on the SA beyond consultation on the early draft but have recently provided re-confirmation of their approval of the approach and findings. This confirmation can be found at Appendix 2 to this document (page 14).
7. Utilising the agreed sustainability appraisal framework set out in the scoping report, SA was undertaken on all sites considered through the Land Allocations process.

8. As set out in the [SA Scoping Report](#) (SLA10a), Council officers undertook the appraisal but the results were then consulted upon at each consultation stage. Relatively few comments were received but wherever possible, any comments received resulted in amendments to the document
9. The sustainability criteria (each of which reflects one or more sustainability objectives) set out in the Scoping Report were used to assess each of the sites based on the following scoring mechanism (although a smaller range of scoring options were used against some criteria as appropriate):
 - ✓ ✓ Contributes significantly towards sustainability objectives (dark green)
 - ✓ Contributes moderately towards sustainability objectives (light green)
 - ~ Neutral (including positive and negative effects balancing one another out) (light yellow)
 - X Detracts moderately from sustainability objectives (light orange)
 - XX Detracts significantly from sustainability objectives (dark orange)
10. To provide a simpler, more immediately visual indication of a site's performance, scores were also colour coded using dark green for the most positive scores, followed by light green, light yellow for neutral, light orange for moderately negative and dark orange for the most negative scores (see text in brackets against scoring system above).
11. Sites were assessed against all criteria but the weight to be given to any given criteria and score in relation to assessing a particular site varied depending on whether a site was proposed for residential or employment or other uses e.g. access to a school is not necessarily as important for an employment site as it is for a residential site.
12. The process of assessing sites and determining the score they got for each criterion was as follows.

SA Objective SP1: To increase the level of participation in democratic processes

13. To assess this objective, sites were assessed against their proximity to a village hall or other community building on the basis that close proximity would mean that people would have improved opportunities to be involved in events such as consultations, community meetings and elections. GIS layers showing the location of village halls and similar buildings were used to guide the scoring along with local knowledge of the location of such buildings. Buffer rings of two kilometres around the location of each facility also aided the scoring. Sites that were in a settlement with two or more such buildings scored best (two ticks), whilst those in settlements with only one scored one tick. Those that were in a settlement with no such building but that were within 2km from such a building scored neutrally (~) whilst those that were in a settlement with no such building and that were over 2km from such a building scored negatively (two crosses).

SA Objective SP2: To improve access to services & facilities, the countryside & open spaces

14. To assess this objective, sites were assessed against their proximity to a shop selling basic day-to-day goods such as bread, eggs, milk and newspapers on the basis that close proximity would reduce the need for people to travel to access basic goods. GIS layers showing the

location of convenience-type stores and village shops with buffer rings of 500m, 3km and 5km were used to guide the scoring along with local knowledge of shops and the type of goods they sell. Sites that fell within 500m of a shop selling day-to-day goods were given the most positive score (two ticks), those that fell between 500m and 3km from such a shop scored one tick, sites with a shop between 3km and 5km away scored neutrally and those over 5km from a shop scored negatively (one cross).

SA Objective SP3: To provide everyone with a decent home

15. No criteria were used to assess sites against this objective as all housing sites will automatically help to provide people with homes and all employment sites will support access to homes by helping to provide/raise average incomes and provide jobs, which in turn will help people to access housing.

SA Objective SP4: To improve the level of skills, education and training

16. To assess this objective, sites were assessed separately against their proximity to primary and secondary schools on the basis that close proximity would reduce the need for children to travel/be transported to access education. GIS layers showing the location of primary and secondary schools with buffer rings of relevant distances were used to determine each site's score for this criterion. Regarding Primary Schools, sites within 500m or 1km scored most positively with two ticks or one tick respectively. Sites between 1km and 3km scored one cross and sites over 3km from a primary school scored most negatively and were assigned two crosses. Similarly, sites within 1.5km of a Secondary School scored most positively and got two ticks. Those up to 3km from a Secondary School got one tick, those within 5km got a single cross and if the site was over 5km away from a Secondary School, two crosses were assigned.

SA Objective SP5: To improve the health and sense of well-being of people

17. To assess this objective, sites were assessed against their proximity to a GP's surgery. Whilst being close to a GP's surgery does not in itself improve health and well being, something had to be utilised as a measure that was tangible and that could be used to differentiate between or determine the effect of individual sites. It would not have been possible to differentiate between or determine the impact sites would have by assessing them against many other health related criteria. As such, GIS layers showing the location of GP's surgeries along with buffer rings showing relevant distances were used to judge site's performance. Sites within 1km of a GP's surgery scored most positively (two ticks), those between 1km and 4km from a surgery scored one tick, those between 4km and 6km away scored negatively with one cross and those over 6km away scored most negatively and were assigned two crosses.

SA Objective SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

18. To assess this objective, sites were assessed for their location in relation to existing communities on the basis that residents of sites that form an integral part of existing communities would have greater opportunity to feel part of the community, see neighbours regularly and partake in activities that contribute to the creation and sustenance of a

cohesive community. As such, in assessing sites, 'within an existing community' was not intended to mean 'within the development boundary' as this criteria relates to the sense of being within community rather than physical proximity or access to a settlement's services and also includes small villages and hamlets (which do not have development boundaries) within the definition of 'community'.

To make the assessment against this criteria, sites' physical location in relation to existing parts of the village was considered using maps, aerial photographs and local knowledge and local knowledge of sense of place and of residents feelings was used to add consideration of whether particular areas feel or are considered to be part of an existing community or not (i.e. does the area around site x feel like it is part of or separate from settlement y and do people that live in a particular location consider it to be part of or separate from a particular settlement?). Sites that were considered to be within or on the edge of an existing community scored positively with a double tick or single tick respectively. Sites that were immediately adjacent an existing group of buildings up to 2km from an existing community scored neutrally whilst sites that were either adjacent an existing group of buildings up to 2km from an existing community (one cross); isolated and not adjacent any existing group of buildings (two crosses) or; adjacent an existing group of buildings over 2km away from an existing community (two crosses) scored negatively.

SA Objective EN1: To protect and enhance biodiversity

19. To assess this objective, GIS layers showing local, national and international biodiversity and geodiversity designations, species records, UK and Cumbria Biodiversity Action Plan information such as location of priority habitats and other biodiversity and geodiversity data provided by Cumbria Biodiversity Records Centre were overlaid on maps showing all the sites being considered as part of the land allocation process. This enabled the Council to identify;

- which sites were subject to (or adjacent areas that were subject to) designations;
- which sites fell within or adjacent priority habitat;
- which sites were known to host (or were close to areas known to host) particular species (both flora and fauna);
- which sites were of (or adjacent areas of) geological importance and;
- which sites had other characteristics that made them important from a biodiversity point of view.

Local knowledge and aerial photographs were also used to so that characteristics not indicated through the GIS information such as non-ancient woodland, ponds/watercourses, extensive hedgerows etc could be taken into account.

Using this information, notes were made against each site of the key findings. Sites were not allocated a score as the nature of the data did not allow sites to be categorised to fit a scoring system, however, colour-coding was used to highlight the level of impact development could potentially have on the biodiversity and/or geodiversity characteristics of a site or the areas adjacent based on the key findings from the GIS information. Irrespective of any other findings on the site, red (most negative) was used to indicate sites

that fell within designations; amber (moderately negative) was used to indicate sites that were shown to host sensitive species (as per the Biodiversity Action Plans) and/or particular protected species such as Great Crested Newts and light yellow (some impact but likely to be capable of mitigation) was used for sites that showed various key species but no particular protected species (this was the majority of sites considered as part of the process). No sites were shown as green as it was assumed that development of any site is likely to have some biodiversity impacts and because details of new developments (such as layout and whether or not they might incorporate particular biodiversity mitigation or improvement measures and of what type) were not available.

In cases where sites had particularly complex information and/or where there were characteristics of high biodiversity or geodiversity importance in close proximity to a site, or where characteristics not detailed in the GIS information (such as known watercourses or areas of woodland) were present, a judgement had to be made as to whether the combination of characteristics constituted a need for a more negative score to be assigned e.g. if a site was not subject to any designations but perhaps had a designation nearby, a high number of different species plus some areas of priority habitat and known woodland on the site. In such cases, a more negative score was assigned to take account of unknowns (such as the biodiversity value of the river or woodland) and the 'worst-case scenario'.

SA Objective EN2: To protect and enhance landscape quality and character

20. To assess this objective, local knowledge of the sites and local landscape quality and character, aerial and 'street view' photography, maps, Cumbria Landscape Assessment information available at the time (Structure Plan Technical paper 5 Landscape Character (2006 - now superseded) ([EvE10](#)) and for sites that came into the process later, Cumbria Landscape Character Guidance and Toolkit (2011) ([EvE11](#))) and GIS layers showing landscape designations such as AONB and Landscapes of County Importance* were used to make a judgement on the impact that the development of a site would have on the landscape.

It should be noted that impact on landscape character is different to landscape quality, landscape value, landscape condition, landscape change or 'the view'. All new development will change the landscape it lies within and the view of that landscape from somewhere in some way, whether it is a single house being demolished and replaced with a new style or size of house or an urban extension. However, landscape character is the resulting overall combination of the distinct and recognisable pattern of elements and features that occur consistently in a particular type of landscape. It takes into account the physical, social, cultural, perceptual and natural environment. It was whether or not the development of a particular site would compromise (and to what extent) this overall character that was assessed in the SA. For example, if a site fell within an area that had the characteristics of a particular landscape character type, it was considered whether;

- these characteristics would be harmed/altered by the development of a site to such a degree that the area could no longer be classed as being of that character type;
- these characteristics would be harmed/altered by the development of a site to such a degree that the character would be compromised;
- these characteristics would be unaffected by the development of a site;

- these characteristics would be strengthened/complemented by development to the extent that a positive effect could be expected.

Landscape quality is determined by looking at the physical state of the landscape and deciding how intact it is. When doing this visual, functional, historical and ecological characteristics are taken into account, along with the state of repair of individual features and elements.

Taking both landscape character and landscape quality into account, sites were scored with a single or double cross if they were considered to have potential for moderate or significant negative impacts on landscape character if developed; sites scored neutrally if it was considered that they would have neither a positive nor negative impact (e.g. this might be the case if a site was surrounded by existing development or had existing development on it) and sites scored single or double tick if they were considered to have potential for moderate or significant positive impacts (e.g. this might be the case if a site had existing derelict buildings or buildings of that otherwise harmed the area on it and could therefore be improved through redevelopment).

*Landscapes of County Importance were set out in policy the Cumbria and the Lake District Joint Structure Plan (the Structure Plan) but the policy was not saved after the Regional Spatial Strategy (RSS) came into force in September 2008. This meant that many sites considered in the Land Allocations process were subjected to SA at a time when the was in force (after the RSS came into force but before it was confirmed that the relevant Structure Plan policy was not to be saved). However, for those sites that came into the process later, this designation was not used as part of the assessment as the policy was no longer extant.

SA Objective EN3: To improve the quality of the built environment

21. To assess this objective, local knowledge of the sites, the local built environment and local heritage features, aerial and 'street view' photography, maps and GIS layers showing the location of listed buildings, scheduled monuments and conservation areas were used to make a judgement on the impact that the development of a site would have on the built environment.

Sites were scored single or double cross if they would affect the structure or setting of listed buildings/structures, scheduled monuments, were in a conservation area or were otherwise considered to have potential for moderate or significant negative impacts on the built environment if developed. Sites scored neutrally if it was considered that sites would have neither a positive nor negative impact (e.g. this might be the case if a site was surrounded or partially surrounded by existing development of no particular architectural merit, if the site was particularly well screened or if the juxtaposition of the site with key built environment features was such that impacts were avoided).

Relatively few sites were scored positively as it was assumed that development of most sites could potentially have some negative built environment impacts and because details of new developments (such as layout and design) were not available. However, some sites scored single or double tick if they were considered to have potential for moderate or significant positive impacts (e.g. this might be the case if they were not close to listed buildings, were not in a conservation area and had existing derelict buildings or buildings that otherwise harmed the area on it and where redevelopment could therefore result in improvements).

SA Objective NR1: To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce the need to travel

22. This objective covers a wide range of issues. Assessment criteria relating to reducing the need to travel/greenhouse gas emissions and the promotion of renewable energy and energy efficiency are cross-cutting and relevant to more than one sustainability appraisal objective – these are therefore covered below. As such, the only criteria used specifically to assess sites against this objective related to air quality. In assessing sites for their impact on air quality, the size of the site, proposed development type and proximity of the site to areas known to have air quality issues were taken into account.

It was considered that no new development could, in itself, improve air quality as even if a development were designed in such a way that residents did not have to drive to reach services and facilities, residents' behaviour cannot be controlled and even there was no net increase in vehicle-borne pollutants, it could only be said to have a neutral impact. As such, no sites scored positively in relation to air quality.

Sites that were small to medium in size in the context of the sites under consideration and that were away from areas known to have air quality issues scored neutrally as it was considered that their contribution to air quality issues would be minimal.

Larger sites and sites that were close to, within or known to be accessed via routes through areas with air quality issues scored negatively, with those that were largest, closest or most likely to impact upon areas known to have air quality issues (because of the road routes required to travel between the site and key services and facilities) scoring most negatively (double cross).

SA Objective NR2: To improve and manage water quality and water resources and services

23. This objective was particularly difficult to develop criteria for as no datasets are available to provide the information required in order to determine whether or not a site will have a particular impact on water quality, resources and services. As such, feedback from United Utilities about individual sites was used along with the consideration that policy, regulations and other requirements would require any new development to have measures in place to ensure that any negative impacts on water quality, resources and services were mitigated and that where possible, any existing negative situations would be improved. Sites were not allocated a score as the nature of the information available to the Council did not allow sites to be categorised to fit a scoring system, however, notes of what United Utilities had said about the site and colour-coding were used to highlight the level of impact development could potentially have based on the information available. United Utilities chose not to comment on many sites and in the case of some sites, United Utilities comments were not submitted until the later stages of the plan preparation process. In these cases, United Utilities comments have fed in to the overall site selection process and thus, the consideration of the suitability of sites but could not be taken into account in the SA. This meant that many sites scored 'neutral' (light yellow) on the basis that;

- United Utilities had raised no concerns;
- it could be assumed that any new development would not be permitted unless it met policy requirements relating to water quality, resources and services and;

- Despite the above, as an unknown, it could not be assumed that there would be no impacts or that there would be an improvement and therefore could not be scored positively.

Some sites also scored neutrally based on what United Utilities has said, for example, they mentioned that there were some problems on certain sites but that these could be overcome. Some sites scored negatively based on what United Utilities had to say, for example if they stated that there were public sewer capacity issues or underground apparatus or aqueducts that required a buffer preventing development above it to such an extent that it would render the site undevelopable due to the dimensions of the site.

Notwithstanding the above, is important to note that due to the limitations and nature of the information available to the Council on this matter in respect of individual sites and the difficulties this presented in assessing sites within the constraints of a scoring system, issues of water quality, resources and services have been more fully taken into account in the wider site assessment process than in the SA alone.

SA Objective NR3: To restore and protect land and soil

24. In order to assess sites against this objective, local knowledge, maps and aerial and 'street view' photography were used to record whether sites consisted of greenfield or brownfield land and whether they were within development boundaries, outside of but adjoining them or in open countryside. Notes were also made on whether a site could be considered to be infill or rounding off and thus would not extend a settlement's footprint. Using this information and taking account of the sequential approach to development as set out in the Core Strategy, sites that were brownfield and within development boundaries scored more positively (two ticks) followed by those that were brownfield on the edge of a settlement (outside the boundary) (one tick). Sites that were greenfield but that were within development boundaries scored neutrally on the basis that whilst they did not extend the settlement's footprint into the countryside, they would result in the loss of greenfield land. Sites that were brownfield but in the open countryside scored a single cross based on the fact that despite being brownfield, they were considered less sustainable due to their location and could be considered more appropriate for restoration to greenfield status given their location or other circumstances, for instance if they had been formerly used only for location specific reasons rather than because it was a suitable site for development generally e.g. quarry uses. Sites scored most negatively when they were greenfield extensions to settlements or greenfield sites in the open countryside, however, some greenfield sites outside of settlement boundaries (and which would therefore extend the settlement beyond its existing boundaries) could also be described as rounding off sites and thus, these sites were scored more favourably than extensions that were not rounding off sites given that they would not extend the settlement's footprint.

SA Objective NR4: To manage mineral resources sustainably, minimise waste and encourage recycling

25. To assess this objective sites were assessed against their proximity to a recycling bring site. GIS layers showing the location of recycling bring sites with buffer rings of 500m, 1km and 5km were used to guide the scoring. Sites that fell within 500m of a recycling bring site were

given the most positive score (two ticks), those that fell between 500m and 1km from such a facility scored one tick, sites with a facility between 1km and 5km away scored neutrally and those over 5km from a recycling bring site scored negatively (one cross).

SA Objectives EC1, EC2 and EC3: To retain existing jobs and create new employment opportunities, To improve access to jobs and To diversify and strengthen the local economy

26. To assess these objectives, sites were assessed against their proximity to higher and further education and/or training facilities as well as against their proximity to existing key employment areas. GIS layers showing the location of such education/training facilities and key employment areas with buffer rings were used to guide the scoring. For education/training facilities, sites that fell within 1km were given the most positive score (two ticks), those that fell between 1km and 4km from such a facility scored one tick, sites with a facility between 4km and 6km away scored neutrally, those between 6km-10km away scored one cross and those over 10km from any such facility scored two crosses. For key employment sites, those sites within 1km of a key employment area scored most positively (2 ticks), those between 1km and 4km away scored one tick, those 4km-6km away scored one cross and those over 6km away scored two crosses.
27. Several SA objectives could not easily be measured by one criteria alone and therefore sites were also assessed against some cross cutting criteria to ensure that sites were assessed against the objectives as fully as possible with the data available to the Council.
28. Sites were assessed against an 'Access to transport' criteria. This relates to objectives **SP2, NR1 and EC2**. To undertake this assessment, GIS layers showing bus routes and distance buffers were used to guide the scoring. Sites that fell within 0.4km of a frequent bus route were given the most positive score (two ticks), those that fell between 0.4km and 0.8km from such a route scored one tick, sites within 0.4km away from an infrequent bus route scored neutrally, those between 0.4km-0.8km away from an infrequent bus route scored one cross and those over 0.8km from any bus route scored two crosses.
29. Sites were also assessed for their proximity to public open spaces. This relates to SA Objectives **SP2, SP5 and SP6**. GIS layers showing the location and type of open space along with buffers showing their catchment (based on the Council's Open Space, Sports and Recreation Assessment – [EvE08](#) and [EvE08a](#)) were used to guide scoring. Sites within the catchment of at least 3 different types of open space scored two ticks, sites within the catchment of 2 scored one tick, those within the catchment of one space scored neutrally and those that were either not within the catchment of any public open space or which were designated as important open space (and would cause public open space provision to be lost if developed) scored two crosses.
30. The fluvial and surface water flood risk levels of sites were also assessed. This relates to SA Objectives **NR1 and EN3**. GIS layers provided by the Environment Agency showing flood risk zones and surface water flooding probabilities were used to guide scoring. With regard to fluvial flood risk, sites within Flood Risk Zone 1 scored most positively (2 ticks), sites within

Zone 2 scored neutrally, sites within Zone 3a scored one cross and those in Zone 3b scored two crosses. In relation to surface water flooding, those sites with no known surface water issues scored two ticks and those with a 1 in 200 year probability of surface water flooding to a depth of more than 0.1m scored a single cross whilst those with the same probability of surface water flooding to a depth of more than 0.3m scored two crosses.

31. The potential of sites to incorporate energy efficiency and renewable energy measures was also considered. This relates to **SP3, EN3, NR1, NR2 and NR4 and may also help to support EC3** by increasing demand for associated products. Local knowledge, maps and aerial and street view photography were used to make the judgement. It was assumed that any new development would not be permitted unless it met policy requirements and building regulation requirements relating to energy efficiency but equally it could not be assumed that developments would necessarily go any further than the basic requirements and therefore most sites scored neutrally. Additionally, it was not possible to make a judgement on suitability for some types of renewables as some can be incorporated into almost any new building whereas others require a location to have specific characteristics such as certain wind speeds and this sort of information was not available for individual sites. Only sites where there was some clear indication of an opportunity to go further, such as a river close by that could offer hydro-electric potential, were scored green.
32. The access of sites to cultural and leisure facilities was assessed and relates to **SP2, SP5 and SP6** in particular. GIS layers showing the location of cultural and leisure facilities, such as leisure centres and arts centres or art galleries, were used to guide scoring. Sites within 6km of two or more such facilities scored most positively (2 ticks), sites between 6km and 8km of two or more facilities scored one tick, sites within 8km of one facility scored neutrally, those 8-10km from one such facility scored one cross and sites that had no cultural or leisure facility within 10km scored most negatively (two crosses).
33. Sites were assessed for their potential to use existing buildings and/or to recycle materials from the existing site. This relates to **SP6, EN1, EN3, NR1 and NR4**. Local knowledge, maps and aerial and street-view photography were used to make a judgement on the extent of the potential. Previously developed sites on which the extent of the existing development covered the majority or the entire site and where the existing buildings were in a state of repair that would allow them to be reused scored most positively (two ticks). Several circumstances could result in a site scoring one tick. These included:
 - previously developed sites on which the extent of the existing development covered around half the site and where the existing buildings were in a state of repair that would allow them to be reused;
 - sites where all the site contained existing buildings but these were not in a state of repair to be reused but the materials could be recycled for use OR;
 - sites where existing development covered the majority of the site or the entire site but only some of it was in a state of repair suited to re-use and the remainder could only be used for materials scored one tick.

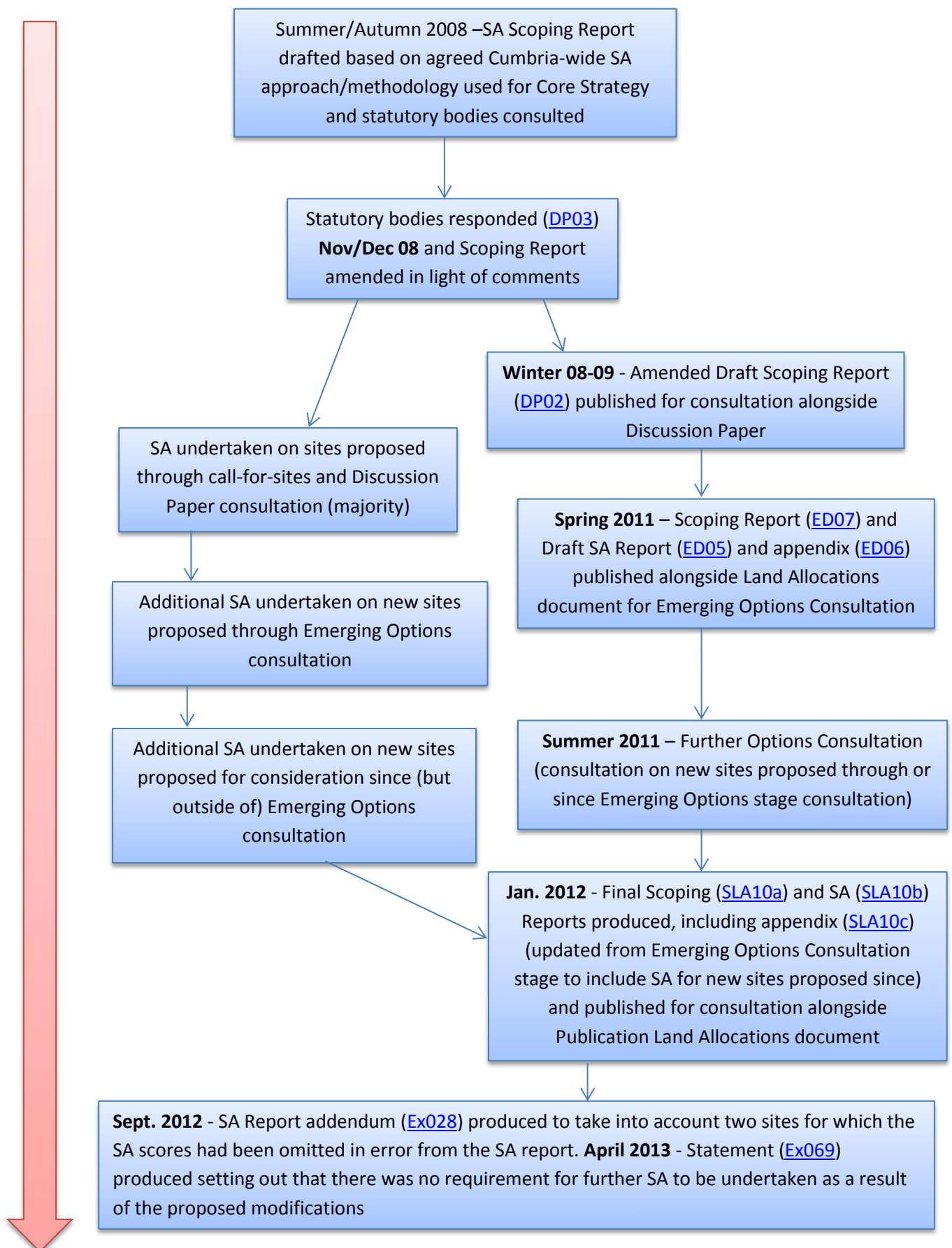
Where a site had a smaller number of existing buildings from which materials could be re-used a neutral score was given. Additionally, it was assumed that almost any development has the potential to use at least some recycled materials salvaged from elsewhere even if there were no existing buildings on the site itself and thus many sites scored neutrally. If a site was considered to have no potential it scored negatively, although few if any sites fell into this category.

34. Finally, sites' potential to contribute to or cause coalescence was assessed. This relates to **SP6, EN1, EN2 and EN3**. If the location of the site and its relationship with other existing development, other proposed sites and the open areas between and around settlements meant that its development would definitely not or would be unlikely to add to the coalescence of any settlements now or in the foreseeable future, the site scored two ticks or one tick respectively. The judgement about the foreseeable future was based on the ideas that unprecedentedly large amounts of development would have to take place at that location or planning rules and regulations would have to change significantly for development necessary to cause coalescence at a particular location to take place. The judgement about contributing to coalescence included the idea that if a development would not cause the overall footprint of a settlement to reach any close to another settlement than it did already, then it could not be said to contribute to the coalescence of the settlements. Sites scored neutrally if their location and relationship with other existing development, other proposed sites and the open areas between and around settlements meant that its development would not contribute to or cause coalescence now but created circumstances that indicated it could potentially do so in the future, usually because of the location of other proposed sites or if settlements were to grow further in a certain direction in the future. Sites scored a single cross if they were considered likely to contribute to coalescence now or in the future because of their location. Sites scored most negatively if their development would definitely cause coalescence immediately.
35. Many sites fell part in one and part in another scoring band and in some cases fell within more than two scoring bands. In these cases, the amount of the sites that fell within each was noted and a judgement made based on the extent of the site that fell within each band as to what colour rating the site should be given. Where the site fell within two bands, the colour rating was given based on the band that the majority of the site fell in, however, where more than two bands were involved the judgement varied depending on what colour rating was deemed to strike the most appropriate balance between the bands. For example, if 95% of a site scored two ticks, 4% of it scored two crosses and 1% scored one cross, the site was colour coded light green as the vast majority of the site had received the most positive scoring but the small parts of the site that scored very negatively meant that the most positive coding could not be assigned.
36. It is also important to mention that whilst flood risk information for all sites was updated following the first assessment, the SA is broadly a 'point in time' assessment. The changing nature of circumstances over time means that in some cases details have changed since the SA was undertaken e.g. changes to bus routes and timetables, shops opening and closing etc

For further information see also section 7 of the [Sustainability Appraisal Report](#) which also provides details as to how sites were assessed.

37. Following the SA of the original sites proposed through call-for-sites and Discussion Paper consultation, work on the Land Allocations was put to one side whilst the Core Strategy was progressed to adoption in October 2010. In the Spring of 2011 an updated Draft Scoping Report ([ED07](#)) and a Draft SA Report ([ED05](#)) and appendix ([ED06](#)) setting out the results of the appraisal were published alongside the Land Allocations document for Emerging Options Consultation. Following the Emerging Options Consultation, additional SA was undertaken on new sites that were proposed for consideration through or since the consultation (those that were consulted on during further options consultation). The same SA methodology and approach to assessing sites as described above was used at all stages. In January 2012, Final Scoping ([SLA10a](#)) and SA ([SLA10b](#)) Reports were produced, including appendix ([SLA10c](#)). These were updated from Emerging Options Consultation stage to include the results of the SA for all new sites proposed since that stage. They were published for consultation alongside the Publication Land Allocations document.
38. The whole process is set out in the diagram at Appendix 1 of this document.
39. The SA assessment for each site was taken into account together with a range of other factors, in informing the recommendations for each site, as set out in detail in the settlement Fact Files ([EvFF01](#)), and in accordance with the site selection methodology statement set out in the Council's response to Matter 1.6 ([Ex020](#), [Ex020A](#), [Ex020B](#) and [Ex020C](#)).
40. Following Submission but prior to the Land Allocations hearings beginning, an SA addendum ([Ex028](#)) was produced to take into account two sites for which the SA scores had been omitted in error from the SA report. Neither site was a proposed allocation.
41. Following the publication of Proposed Main Modifications to the Land Allocations document, a Main Modification Sustainability Appraisal Statement ([Ex069](#)) was produced setting out how consideration has been given to whether further SA of the sites is needed as a result of the main modifications. The statement concluded that there was no requirement for further SA to be undertaken as a result of the proposed modifications.

Appendix 1: Sustainability Appraisal Process



Appendix 2: Statutory Bodies – Confirmation of approval of SA approach and findings

From: Carter, Philip A [mailto:PCARTER@environment-agency.gov.uk]
Sent: 16 May 2013 10:50
To: Woodend, Lorayne
Subject: RE: Statutory Bodies - Sustainability Appraisal Confirmation for Land Allocations hearings

Lorayne

I can confirm that the Environment Agency is satisfied with the process and approach taken in relation to the sustainability appraisal of the proposed land allocations DPD and that the findings of the SA report are robust in relation to the testing of the alternatives and the choices made.

Kind regards

Philip
Philip Carter, Planning Officer - Sustainable Places, Environment Agency

From: HRYCAN, Emily [mailto:Emily.Hrycan@english-heritage.org.uk]
Sent: 20 May 2013 13:59
To: Woodend, Lorayne
Subject: FW: URGENT please response required ASAP - Sustainability Appraisal Confirmation for Land Allocations hearings
Importance: High

Lorayne,

I can confirm that English Heritage is satisfied with the process and approach taken in relation to the sustainability appraisal of the proposed land allocations DPD and that the findings of the SA report are robust in relation to the testing of alternatives and the choices made.

Regards,
Emily

Emily Hrycan, Historic Environment Planning Adviser (North West), English Heritage

From: Wheeler, Kate (NE) [mailto:kate.wheeler@naturalengland.org.uk]
Sent: 21 May 2013 13:22
To: Woodend, Lorayne
Subject: RE: URGENT please response required ASAP - Sustainability Appraisal Confirmation for Land Allocations hearings

Lorayne

Overall Natural England is happy with the approach taken with the Sustainability Appraisal, we have no specific comments to make on the alternatives assessment.

Thank you

Kind regards

Kate Wheeler

Lead Adviser, Land Use Operations Team, Natural England.